

Planning Committee

Tuesday 3 July 2018
6.30 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

Membership

Councillor Martin Seaton (Chair) (apologies given)
Councillor Lorraine Lauder MBE (Vice-Chair) (in the chair)
Councillor James McAsh
Councillor Hamish McCallum
Councillor Adele Morris
Councillor Jason Ochere
Councillor Cleo Soanes
Councillor Kath Whittam

Reserves

Councillor James Coldwell
Councillor Tom Flynn
Councillor Renata Hamvas
Councillor Darren Merrill
Councillor Jane Salmon

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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Contact

Virginia Wynn-Jones on 020 7525 7055 or email: virginia.wynn-jones@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Eleanor Kelly

Chief Executive

Date: 25 June 2018



Planning Committee

Tuesday 3 July 2018
6.30 pm
Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
	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.	
5.	MINUTES	3 - 7
	To approve as a correct record the Minutes of the open section of the meeting held on 4 June 2018	

Item No.	Title	Page No.
6.	DEVELOPMENT MANAGEMENT	8 - 12
6.1.	SHOPPING CENTRE SITE, ELEPHANT AND CASTLE, 26, 28, 30 AND 32 NEW KENT ROAD, ARCHES 6 AND 7 ELEPHANT ROAD, AND LONDON COLLEGE OF COMMUNICATIONS SITE, LONDON SE1	13 - 300
6.2.	METROPOLITAN TABERNACLE CHURCH, ELEPHANT AND CASTLE, LONDON, SE1 6SD	301 - 310
6.3.	GROUND FLOOR, PERRONET HOUSE GAYWOOD ESTATE, PRINCESS STREET, LONDON, SE1 6JR	311 - 332

ANY OTHER OPEN BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.

EXCLUSION OF PRESS AND PUBLIC

The following motion should be moved, seconded and approved if the committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”

PART B - CLOSED BUSINESS

ANY OTHER CLOSED BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.

Date: 25 June 2018



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. The role of members 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.
6. Speakers should lead the committee to subjects on which they would welcome further questioning.
7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.

8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants.
9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.
10. No smoking is allowed at committee.
11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

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

Contacts: General Enquiries
Planning Section, Chief Executive's Department
Tel: 020 7525 5403

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



PLANNING COMMITTEE

MINUTES of the Planning Committee held on Monday 4 June 2018 at 6.30 pm in Meeting Room G02A - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Martin Seaton (Chair)
 Councillor Lorraine Lauder MBE (Vice-Chair)
 Councillor James McAsh
 Councillor Hamish McCallum
 Councillor Adele Morris
 Councillor Jason Ochere
 Councillor Cleo Soanes
 Councillor Kath Whittam

OTHER MEMBERS

PRESENT: Councillor Sandra Rhule

OFFICER SUPPORT: Dipesh Patel (Development Management)
 Jon Gorst (Head of Regeneration & Development Team (Legal Services))
 Bridin O'Connor (Development Management)
 Victoria Crosby (Development Management)
 Emma-Lisa Shiells (Development Management)
 Sarah Parsons (Development Management)
 Beverley Olamijulo (Constitutional Officer)

1. APOLOGIES

None were received.

2. CONFIRMATION OF VOTING MEMBERS

Those members listed as present were confirmed as voting members for the meeting.

3. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

The chair gave notice of the following additional papers which had been circulated at the meeting:

- Addendum report relating to items 8.1 and 8.2
- Members' pack relating to items 8.1 and 8.2

At this juncture, the chair gave the committee time to read through the addendum report because it had not been circulated prior to the meeting.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

5. MINUTES

RESOLVED:

That the minutes of the meeting held on 21 March 2018 be agreed as an accurate as an accurate record of the meeting.

6. PLANNING SUB-COMMITTEE ARRANGEMENTS FOR 2018-19

RESOLVED:

1. That the size and composition of the planning committee, as agreed by annual council assembly on 21 May 2018 be noted; and the roles and functions of the planning committee and its sub-committees set out in Appendix 1 be agreed.
2. That the establishment of two planning sub-committees with the size and composition set out in paragraph 11 of the report be agreed.
3. That the appointment of the planning sub-committees' chairs and vice-chairs for 2018-19 set out in Appendix 2 be agreed.

7. ARTICLE 4 DIRECTION TO WITHDRAW THE PERMITTED DEVELOPMENT RIGHTS ASSOCIATED DEMOLITION THE OLD SOUTHERN RAILWAY STABLES AND THE FORGE, CAITLIN STREET WITHIN OLD KENT ROAD OPPORTUNITY AREA

An officer introduced the report and members of the committee considered the information contained therein. Members of the committee asked questions of the officer.

RESOLVED:

1. That an immediate Article 4 Direction set out in Appendix A of the report to withdraw the permitted development right granted by the General Permitted Development Order 2015 (as amended) (GPDO) for demolition of the Old Southern Railway Stables and Forge buildings, Caitlin Street ('the Stables and the Forge') (site location identified at Appendix B) in the Old Kent Road opportunity area which has been identified as a heritage asset be agreed.
2. That the six week consultation in relation to the immediate Article 4 Direction be agreed.

3. That the equalities analysis of the proposed Article 4 Direction (Appendix C) be noted.

8. DEVELOPMENT MANAGEMENT

RESOLVED:

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.

8.1 40-46 SOLOMONS PASSAGE (FORMERLY 159-161 PECKHAM RYE), LONDON SE15

The committee agreed to consider both applications together as they relate to the same site address. It was noted that the decisions would be taken separately.

Planning application reference: 17/AP/2330

Report: see pages 48 to 105 of the agenda pack and pages 1 to 6 of the addendum report.

PROPOSAL

Demolition of 42 and 44 Solomons Passage (blocks B and C which contain 48 residential units) and erection of a new part 4, part 6-storey building over existing, rearranged basement car park to provide 50 residential units together with provision of landscaping works (use class C3).

The committee heard the officer's introduction to the report and addendum report. Councillors asked questions of the officer.

An objector addressed the meeting. Members of the committee asked questions of the objector.

The applicant's agent addressed the committee, and answered questions by the committee.

There were no supporters who lived within 100m of the development site present and wished to speak.

There were no ward councillors present who wished to speak at the meeting.

The committee put further questions to officers and discussed the application.

A motion to grant planning permission was moved, seconded, put to the vote and declared

carried.

RESOLVED:

That planning application 17/AP/2330 be granted, subject to conditions outlined in the report including:

- a. That the applicant enters into an appropriate legal agreement.
- b. That in the event that the requirements of a) are not met by 28 September 2018, the director of planning be authorised (if appropriate) to refuse planning permission for the reasons set out in paragraph 171.

And

- c. The amendments outlined in the addendum report concerning on site affordable housing provision to the scheme (and as further amended during the meeting for the distribution across the three blocks), amending recommended conditions, and confirming the metallic cladding panels.

8.2 40-46 SOLOMONS PASSAGE (FORMERLY 159-161 PECKHAM RYE), LONDON SE15

Planning application reference: 17/AP/2326

Report: see pages 106 to 144 of the agenda pack and pages 5 to 6 of the addendum report.

PROPOSAL

Re-cladding of Blocks A & D including an increase in the parapet height of 450mm, rearrangement of the car parking (basement car park to be retained) and landscaping improvements.

A motion to grant planning permission was moved, seconded, put to the vote and declared carried.

RESOLVED:

That planning application 17/AP/2326 be granted subject to conditions outlined in the report, including:

- a. The applicant entering into an appropriate legal agreement.
- b. That in the event that the requirements of a) are not met by 28 September 2018, the director of planning be authorised (if appropriate) to refuse planning permission for the reasons set out in paragraph 121.

And

- c. The detailed set out in the addendum report regarding the on site affordable housing provision (as further amended during the meeting for the distribution across the three blocks) and confirming the metallic cladding panels.

The meeting ended at 9.30 pm

CHAIR:

DATED:

Item No. 6.	Classification: Open	Date: 3 July 2018	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 Law and Democracy

12. A resolution to grant planning permission shall mean that the director of planning 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 director of planning 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 director of planning 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 law and democracy, and which is satisfactory to the director of planning. 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 law and democracy. 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	Virginia Wynn-Jones 020 75257 055
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 the Planning Department 020 7525 5403

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidi Agada, Head of Constitutional Services		
Report Author	Virginia Wynn-Jones, Principal Constitutional Officer Jonathan Gorst, Head of Regeneration and Development		
Version	Final		
Dated	25 June 2018		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments sought	Comments included	
Director of Law and Democracy	Yes	Yes	
Director of Planning	No	No	
Cabinet Member	No	No	
Date final report sent to Constitutional Team		25 June 2018	

ITEMS ON AGENDA OF THE PLANNING COMMITTEE

on Tuesday 03 July 2018

Appl. Type	Full Planning Application	Reg. No.	16-AP-4458
Site	SHOPPING CENTRE SITE, ELEPHANT AND CASTLE, 26, 28, 30 AND 32 NEW KENT ROAD, ARCHES 6 AND 7 ELEPHANT ROAD, AND LONDON COLLEGE OF COMMUNICATIONS SITE, LONDON SE1	TP No.	TP/1512-Q
		Ward	East Walworth
		Officer	Victoria Lewis

Recommendation GRANT SUBJECT TO LEGAL AGRT, GLA AND SOS*Item 6/1***Proposal**

Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.

In the Council's opinion the proposal may affect the setting of the following listed buildings and conservation areas:

Metro Central Heights, Newington Causeway; Metropolitan Tabernacle, Newington Butts; Michael Faraday Memorial, Elephant and Castle; the Imperial War Museum, St George's Road; and the Obelisk at St George's Circus.

Elliot's Row; St George's Circus and West Square Conservation Areas and the listed buildings therein, and the Walcot Square Conservation Area in Lambeth

The application is accompanied by an Environmental Statement (ES) submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) 2011 (as amended). Copies of the ES may be obtained from Waterman Infrastructure & Environment Ltd, Pickford's Wharf, Clink Street, London SE1 9DG at a charge of £950 (printed) or £25 (CD).

HARD COPIES OF THE APPLICATION DOCUMENTS ARE AVAILABLE FOR INSPECTION AT NEWINGTON TEMPORARY LIBRARY, SECOND FLOOR ARTWORKS BUILDING, ELEPHANT ROAD (Monday to Friday 9am to 8pm, Saturday 9am to 5pm, Sunday 12pm to 4pm)

Appl. Type	Listed Building Consent	Reg. No.	16-AP-4525
Site	METROPOLITAN TABERNACLE CHURCH, ELEPHANT AND CASTLE, LONDON, SE1 6SD	TP No.	TP/1541-14
		Ward	Cathedrals
		Officer	Victoria Lewis

Recommendation GRANT SUBJECT TO LEGAL AGREEMENT*Item 6/2***Proposal**

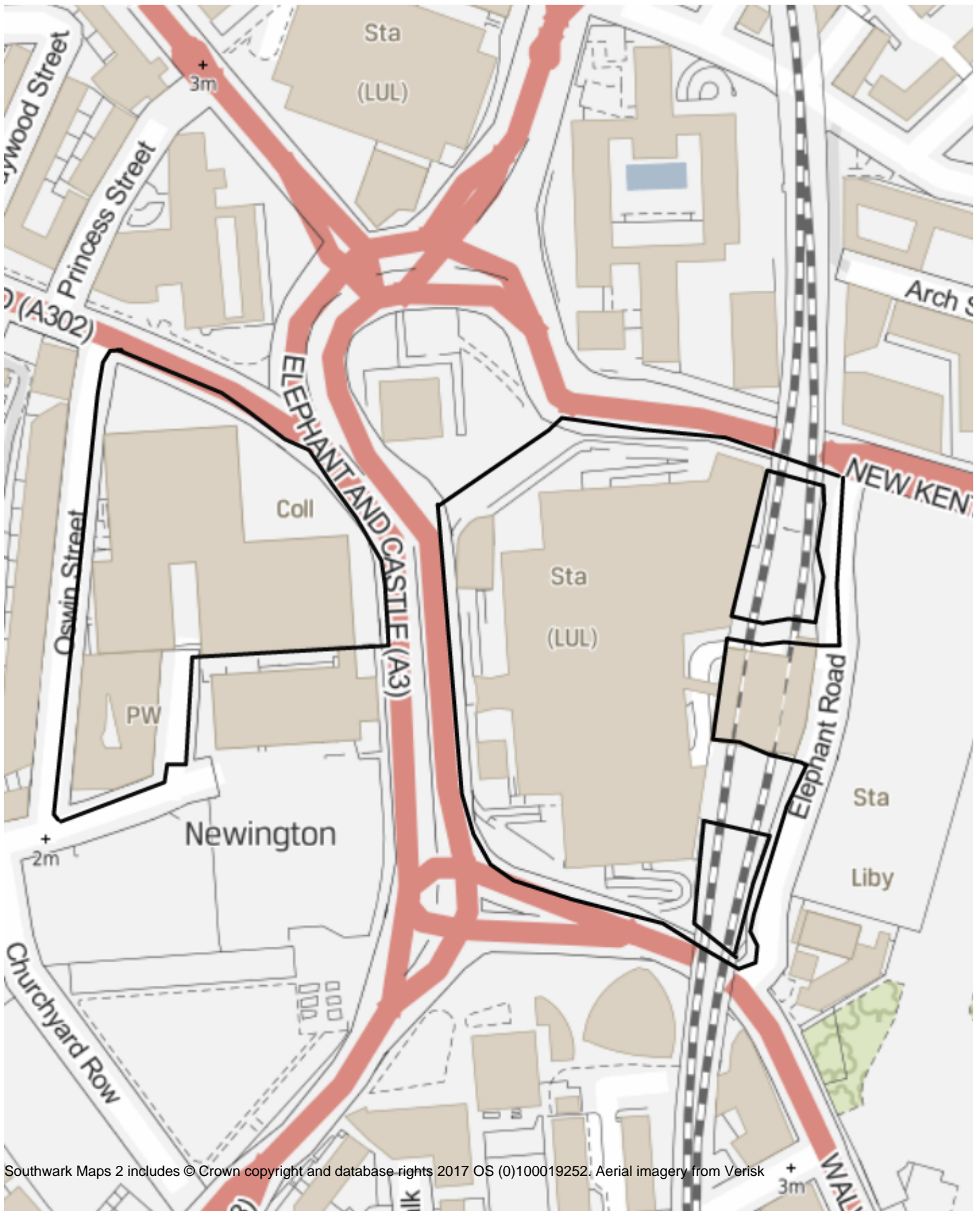
Minor amendments to the northern elevation of the grade II listed Metropolitan Tabernacle building by virtue of the demolition of the immediately adjacent/abutting London College of Communications building (subject to planning application reference: 16-AP-4458).

Appl. Type	Full Planning Application	Reg. No.	17-AP-4651
Site	GROUND FLOOR, PERRONET HOUSE GAYWOOD ESTATE, PRINCESS STREET, LONDON, SE1 6JR	TP No.	TP/1399-67
		Ward	Cathedrals
		Officer	Victoria Lewis

Recommendation GRANT PERMISSION*Item 6/3***Proposal**

Change of use of 12 existing garages / parking spaces to provide retail space (use class A1), café space (use class A3) and ancillary storage / plant and servicing space, together with new glazing and doors to south, east and west elevations.

ELEPHANT AND CASTLE SHOPPING CENTRE



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50 m

7-Dec-2017

Scale = 1 : 2000

Item No. 6.1	Classification: Open	Date: 3 July 2018	Meeting Name: Planning Committee
Report title:	Development Management planning application: 16/AP/4458 for: Full Planning Permission Address: SHOPPING CENTRE SITE, ELEPHANT AND CASTLE, 26, 28, 30 AND 32 NEW KENT ROAD, ARCHES 6 AND 7 ELEPHANT ROAD, AND LONDON COLLEGE OF COMMUNICATIONS SITE, LONDON SE1 Proposal: Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.		
Ward(s) or groups affected:	North Walworth St George's		
From:	Director of Planning		
Application Start Date 02/12/2016		Application Expiry Date 24/03/2017	
Earliest Decision Date 19/01/2017		Draft Planning Performance Agreement	

RECOMMENDATION

1.
 - a) That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement by no later than 18 December 2018, and subject to referral to the Mayor of London, notifying the Secretary of State, and subject to a decision from Historic England not to list the shopping centre.
 - b) That environmental information be taken into account as required by Regulation 3(4) of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 (as amended).
 - c) That following the issuing of the permission, the Director of Planning place a statement on the Statutory Register pursuant to Regulation 24 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 which contains the information required by Regulation 21, and that for the purposes of Regulation 24(1)(c) the main reasons and considerations on which the planning committee's decision is based are as set out as in the report.
 - d) In the event that the requirements of (a) are not met by 18th December 2018, that the Director of Planning be authorised to refuse planning permission, if appropriate, for

the reasons set out at paragraph 757 of this report.

COMMITTEE DEFERRAL

2. This application has been presented to two previous Planning Committees, on 16 and 30 January 2018 respectively. At the Planning Committee meeting on 16 January 2018 and following a lengthy debate, a motion to refuse planning permission was started, but members deferred making a decision to enable officers to prepare reasons for refusal based on reasons provided by members at the meeting.
3. Officers presented the draft reasons for refusal to the Planning Committee on 30 January 2018, but on the day of the committee an email by the developer had been forwarded to members of the committee and broadcast on social media making proposals for further discussions. This constituted new material considerations, both in planning terms and in terms of the equalities duty, which councillors had to take into account. This submission was not a formal amendment to the application, but did seek to address the key concerns discussed at the meeting on 16 January 2018, namely: the amount of social rented units, situation of the traders, and leisure provision for groups with protected characteristics. Officers had not had sufficient time to review these proposals, which did not constitute a formal revision of the application, and members of the public were unlikely to have been aware of them.
4. The Chair of the Planning Committee asked whether the member who had put forward the motion to refuse permission on 16 January 2018 wished to withdraw it. The motion was not withdrawn, and the Chair therefore asked for a seconder. There was no seconder, therefore the motion to refuse fell. A subsequent motion to defer this item was proposed, seconded, put to the vote and declared carried, to enable officers to consider and consult upon the applicant's revised offer.
5. Officers have since considered and consulted upon the revised offer which is set out in a letter dated 13 February 2018 (the applicant's update letter). The officer report remains largely as per the earlier report but has been updated accordingly, and where substantive new text has been added, this has been italicised. The main changes the applicant has made to the application since it was presented to the Planning Committee on 16 January 2018 are as follows:

Affordable housing / Private rented housing

(i) A revised affordable housing offer has been submitted which increases the number of social rented units in the development and provides them as traditional social rented units which could be owned by the council or a registered provider, as opposed to 'social rent equivalent' units retained by the developer. The revised proposal reduces the number of London Living Rent units within the development, and increases the number of Discount Market Rent units. For clarity, all affordable units within the development would remain affordable in perpetuity.

Agreement to a 30 year covenant for the private units on the east site

(iii) The applicant proposes a fall back position whereby the housing coming forward on the west site could be either build-to-rent, in which case the private units would have a 30 year covenant, or build-to-sell, in which case no covenant would be required.

West site childrens' playspace

(iv) An additional financial contribution is proposed towards childrens' playspace on the west site to reflect the increased number of social rented units now proposed.

Trader support

(v) The applicant proposes to set up a trader panel to oversee the delivery of the relocation strategy. This draft proposal is described in the Statement of Community Involvement Section of this report.

Pastor Street

(vi) The applicant proposes to develop a vision for Pastor Street on the west to provide a cluster of affordable retail and commercial spaces as part of the formal affordable retail offer. A Pastor Street advisory group would be set up to oversee this.

Bingo and music venue

(vii) The applicant proposes to give the right of first refusal to a bingo operator, on commercial terms, to lease approximately 1,850sqm of the leisure floorspace within the proposed development. This would be large enough to accommodate approximately 959 seats.

Transport

(viii) Additional information has been submitted to consider what the transport implications would be if the bingo facility referred to above were provided on the west site.

(ix) Although not specifically referred to in the applicant's update letter, at the Planning Committee meeting on 16 January 2018 the applicant agreed to fund a controlled parking zone (CPZ) review in relation to the west site.

(x) Additional equalities information has been submitted to assess the impacts of the proposal and to address comments made following public consultation;

(xi) An Environmental Impact Assessment update letter has been submitted, which advises that the amendments outlined above would not give rise to any new, additional or different likely significant effects from those already considered within the Environmental Statement.

Other matters

6. The applicant's update letter advises that a temporary retail facility would be created on Castle Square, which is a new area of public realm to the west of the site. The letter advises that it would extend to around 300sqm, and the units would be offered in priority to independent retailers currently located within the shopping centre at affordable rents discounted in line with the standard of accommodation likely to be provided. Members must be aware that this proposal would need to obtain planning permission and the necessary land interest to implement any permission, and as such no weight can be attributed to it in making a decision on the application currently before you. The applicant has agreed that the s106 agreement for the current application can include an obligation requiring the applicant to provide this temporary retail facility in the event that it obtains planning permission, and officers are still in

discussions with the applicant regarding this additional proposal.

INTRODUCTION

7. The redevelopment of the shopping centre as proposed by this application has been a long held aspiration and is reflected in a series of development plan documents over many years. The Elephant and Castle has experienced enormous change over the past 10 years with the redevelopment of the Heygate Estate which is well under way, the new leisure centre, developments at Elephant One and One the Elephant to name a few. However, the Elephant and Castle Shopping Centre has been seen as a very poor design almost since it was completed in the 1960s. Perhaps, more importantly, the access to Elephant and Castle Underground Station has also been seen as a severe defect in the functioning of the area, preventing the town centre from taking its proper place as a focus for the commercial and social life of Southwark and south London. The redevelopment of the shopping centre will provide key new infrastructure to support the changing environment. Critically this scheme provides a unique opportunity for improvements to the Northern Line ticket hall to support new and existing residential development, commercial development and the various education institutions in the area including the London College of Communications intends relocate within the new development, reinforcing the area's position as a major centre for higher education and further contributing to the life and character of the area.
8. While the proposal realises the Council's long held ambitions to make the Elephant and Castle the successful town centre that has been promised by its regeneration plans, it would also make a significant contribution to much needed new homes in the borough. Given the complexities and risks involved in demolishing the existing shopping centre and creating a new town centre with a new Underground entrance and link to the National Rail Station, it can be expected that there would be challenges to the viability of the scheme affecting its ability to deliver affordable housing. In spite of this, the development would achieve 35% affordable housing, with a substantial part of this being at *Social Rent* levels which would provide a wide range of people with the opportunity to live in this highly accessible central London location. There would, however, be a review mechanism which could lead to further improvements to the affordable housing offer as uncertainties about future costs and values are removed.
9. The redevelopment of the shopping centre would inevitably have impacts on the wide range of independent businesses that have established there over the years. The redevelopment proposal takes account of this, provides support for these businesses, and complies with the Council's Supplementary Planning Guidance by providing 10% affordable retail space on site.
10. The application before you is therefore one which would contribute to the transformation of this very significant part of London and an area at the heart of Southwark.

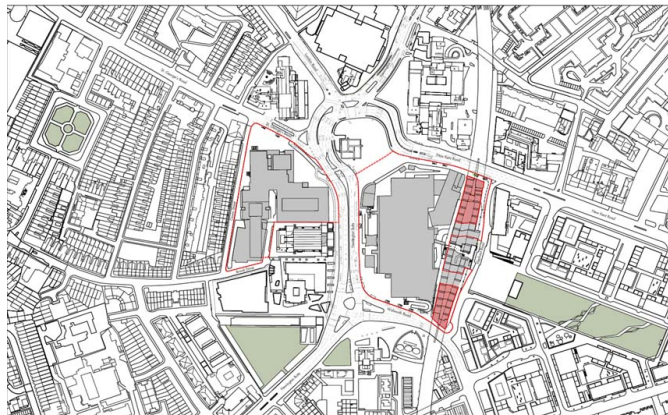
BACKGROUND INFORMATION

11. Two applications have been submitted by Elephant and Castle Properties Co. Ltd. The first is for full planning permission for a comprehensive redevelopment of Elephant and Castle shopping centre, 26, 28, 30 New Kent Road and arches 6 and 7 Elephant Road, and the London College of Communications (LCC) site. The existing London College of Communications building would be demolished, and it adjoins the northern elevation of the Metropolitan Tabernacle church, the façade of which is grade II listed. In light of this a second application for listed building consent for minor amendments to

the northern elevation of the Tabernacle has been submitted, and this is considered in a separate report listed as item 6.2 on the committee agenda.

Site location and description

12. The site is located in the heart of the Elephant and Castle Opportunity Area which covers an area spanning 122 hectares. It extends just beyond St George's Circus to the north, New Kent Road to the east, Walworth Road as far as Burgess Park to the south, and Kennington Park Road to the west; the borough boundary with Lambeth is approximately 160m to the south-west. Located on what for centuries was the main road into London from the south, Elephant and Castle has long been a bustling south London centre and is a transport hub, served by both the Northern and Bakerloo Line underground lines, a railway station and numerous bus routes. The number of theatres and taverns which were established in the area gave it a reputation as the "Piccadilly Circus" of south London. However, the area was redeveloped in the 1960s following bomb damage during WWII, and a number of issues arose out of the redevelopment including a predominance of large, single use buildings, an environment dominated by heavy traffic, and disconnected public realm.
13. Elephant and Castle is undergoing a period of transformation, with significant redevelopment taking place. The local planning policy framework for managing the regeneration of the area is the adopted Elephant and Castle Supplementary Planning Document / Opportunity Area Planning Framework (SPD / OAPF). The SPD sets out a vision for the area which includes transforming it into an attractive central London destination, making it a more desirable place to live for existing and new residents, with excellent shopping, leisure, learning and cultural facilities, and significant new housing.
14. The site comprises two distinct areas located on opposite sides of Elephant and Castle. They are described in the submission as the east site and the west site, and they occupy a combined area of 3.56 hectares (ha). The east site comprises Elephant and Castle Shopping Centre, 26, 28, 30 and 32 New Kent Road and Arches 6 and 7 Elephant Road, and the west site is the London College of Communications (LCC) which sits under the University of the Arts London (UAL) umbrella. Both parts of the site sit within in the SPD central character area, and the east site sits within the SPD core area which is to be the main focus for development activity.



East and West Sites

East site

15. This part of the site measures 2.21ha and is bound by New Kent Road and a new

area of public realm known as the Peninsula to the north (the entrance to the Bakerloo Line underground station is further north again), an elevated railway viaduct incorporating Elephant and Castle Railway Station to the east, Walworth Road to the south, and Elephant and Castle to the west. It contains a number of buildings, the largest of which is the shopping centre. The shopping centre is a 3-storey building which opened in 1965, and which incorporates Hannibal House, a 16-storey office block. The shopping centre sits above a basement car park and servicing area accessed via a ramp which passes beneath the viaduct from Elephant Road. It contains a range of retail and leisure uses including a supermarket, bowling alley and bingo hall, and it provides access to the railway station. There are currently around 65 businesses within the shopping centre and Hannibal House. Outside the shopping centre there are approximately 35 market stalls at lower ground floor level in an area known as The Moat, and 3 retail kiosks at ground floor level. The Northern Line ticket hall is located in front of the shopping centre, facing Elephant and Castle and the Peninsula.

16. Numbers 26-32 New Kent Road comprise the Charlie Chaplin public house, the Coronet Theatre, a newsagents and a dental surgery; there is understood to be a flat above the Charlie Chaplin and the newsagents. Four railway arches are included in this part of the site, the northern two of which provide access / egress to the shopping centre basement, and two arches to the south of the railway station which are occupied by Distriandina, a Colombian restaurant, and Elephant Mall which incorporates a number of uses including retail sales, a café, a hair salon and English classes.

West site

17. This part of the site measures 1.35 ha and is bound by St George's Road to the north, Elephant and Castle to the east, Brook Drive, Pastor Street and the Metropolitan Tabernacle (a church with a grade II listed façade) to the south, and Oswin Street to the west. The LCC building is a part 4-storey, part 16-storey building completed in 1962, with some extensions added thereafter. It includes a small parking area comprising parking spaces on the northern part of the site which are accessed from Oswin Street.

Details of proposal

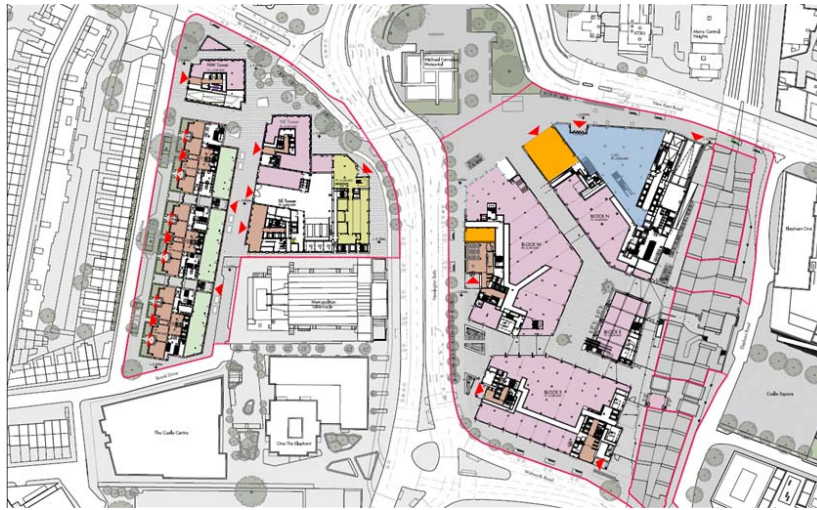
18. Elephant and Castle Properties Co. Ltd. has applied for full planning permission for a comprehensive, mixed use development on the site, following the demolition of all of the existing buildings and structures. The building heights would range from single storey to 35-storeys (maximum height of 124.5m AOD) above multi-level and single basements, and would provide a range of uses comprising retail (use Class A1-A4), office (use class B1), education (use class D1), assembly and leisure (use class D2), and 979 residential units (use class C3). There would be a new station entrance and station box for the Northern Line, together with a new means of access, public realm, landscaping, parking, cycle storage, plant and servicing areas, and a range of other associated and ancillary works and structures. The application is accompanied by an Environmental Statement (ES).
19. A breakdown of the existing and proposed floorspace is set out below:

Table 1

Land use	Existing GIA sqm	Proposed GIA sqm	Net Difference GIA sqm
A1-A4 (A1 – retail, A2 – financial and professional institutions, A3 – cafes and restaurants, A4 – drinking establishments)	15,132	18,234 This figure excludes the basement servicing area for the proposed shopping centre).	+3,102
Flexible use A1-A4, B1	0	2,806	+2,806
B1 (Business)	10,669	2,806 (this forms part of the flexible A1-A4 or B1 space identified above)	Between - 7,863 and - 10,699 (total loss) depending on how much of the flexible space is occupied for B1 use.
C3 (Residential)	Not surveyed	106,471	Up to +106,471
D1 (Non-residential institutions)	31,553	41,405	+9,852
D2 (Assembly / leisure)	12,072	5,743	-6,329
Sui generis (LUL Station)	unspecified	3,965	

East site

20. The development on this part of the site would be laid out as four plots, E1 to E4 which would be set around a new public square at the centre of the site, 'The Court'; this would be the main public / flexible event space for this part of the development. There would be two new streets leading to The Court; Station Route, which would connect the Peninsula with The Court and Elephant and Castle railway station, and Park Route which would connect Elephant and Castle with The Court. Railway arches 6 and 7 Elephant Road would be knocked through to connect Park Route with Elephant Park, which is a new park being delivered as part of the redevelopment of the Heygate Estate to the east of the railway viaduct. A third route would be created on the southern part of the site, connecting Walworth Road with The Court, running parallel with the railway viaduct. The plots would sit above a two-level basement which would be reached via a new access from New Kent Road. The basements would contain the London Underground station box, servicing areas, cycle parking, an energy centre, plant space, storage space, refuse storage and retail space.



Plan showing plot layouts

21. The shopping centre and leisure uses would predominantly be at ground, first and second floor levels within the plots which would be connected by footbridges, and there would be three residential towers above. A detailed breakdown of each plot is as follows.

Plot E1

22. This plot would be located on the northern part of the site with frontages to New Kent Road and the Peninsula, and set a minimum of 7m away from the railway viaduct. It would contain a 12-storey building (55.2m AOD) education floorspace building which the application advises would be the new home of the LCC which would move from its existing site on the opposite side of Elephant and Castle. It would incorporate the London Underground station box which would directly face the Peninsula, and which in the future would be fitted out by Transport for London (TfL) as a new Northern Line ticket hall. Part of the ground, first and second floors of this building facing Station route would comprise 2,455sqm of flexible retail space as part of the new shopping centre. Materials proposed comprise reconstituted stone, metal cladding, glazed curtain walling and black fritted glass.

Plot E2

23. This plot would be located on the western part of the site with frontages to the Peninsula and Elephant and Castle. It would contain 8,149sqm GIA of retail space at ground, first and second floor levels, with the leisure space extending up to an equivalent of 6th floor level. Permission is sought for general leisure floorspace, although the application advises that this is likely to accommodate a multi-screen cinema, potentially with up to 8 screens. Tower 1 would sit within this plot which would comprise 210 residential units and would be part 27, part 32-storeys high (maximum 124.45m AOD). The taller element would be located to the south, and it would contain a residential roof terrace at 28th floor level.
24. Materials proposed for this plot comprise brickwork, metal cladding and a metal screen to wrap around the cinema. The tower would be faced with brickwork, reconstituted stone, metal cladding for the window reveals, glazed balcony balustrades and a metal parapet frame at the top of the building. These materials would be used on all three towers on the east site.

Plot E3

25. This would be located on the southern part of the site with frontages to Elephant and Castle and Walworth Road, and set a minimum of 10m away from the railway viaduct. It would provide 4,709sqm (GIA) of flexible retail space at basement mezzanine, ground and first floor levels and would incorporate residential towers 2 and 3. These towers would provide 271 residential units starting at second floor level, and would be accessed from Elephant and Castle and Walworth Road. Tower 2 would be located closest to Newington Butts and would be 21-storeys high (80.25m AOD) with a roof terrace at 16th floor level. Tower 3 would be located next to the railway viaduct and would be 23-storeys high (86.425m AOD), with a roof terrace at 20th floor level.
26. Materials proposed for this plot comprise reconstituted stone, brick, glazing and metal elements.

Plot E4

27. This plot would be located on the eastern part of this site, set a minimum of 11m off the railway viaduct and would contain a 4-storey building (24.9m AOD) comprising 1,819sqm (GIA) of flexible retail and associated plant space on all levels, and a terrace on the top floor. There would be stairs and escalators on the southern side of the building, and would be connected to plots E1 and E3 by footbridges at first floor level. This building would be a glass and metal frame structure, with an exposed structural frame comprising steel columns and beams.
28. The knocking through of arches 6 and 7 Elephant Road would form part of this plot, and the new route would incorporate a small retail kiosk beneath arch 6 which would be constructed of metal cladding, with timber and glass bi-folding doors. The railway arches are owned by Network Rail and leased to the current occupiers. The applicant is pursuing an 'arch swap' with Network Rail, whereby the two arches which currently give access to the shopping centre and which are leased by the applicant would be given back to Network Rail in exchange for knocking through arches 6 and 7. At the time of writing there is no certainty as to whether this could be achieved, and this is considered in the transport section of the report. The arches which currently give access to the shopping centre have been included in the red line boundary for the planning application, although no details of works to be undertaken to them have been provided.

Table 2: East site summary

Land use	Quantity
A1-A4	17,132 sqm
D1	41,405 sqm
D2	2,895 sqm
Transport infrastructure	3,965sqm
Residential	481 units (12 x studios, 174 x 1-beds, 232 x 2-beds and 63 x 3-bed



East Site Elevations

West site

29. This part of the site would be laid out as three plots, W1, W2 and W3, which would sit either side of Pastor Street which currently terminates at the rear of the Metropolitan Tabernacle. Pastor Street would be extended northwards to meet St George's Road, effectively creating a new central street through the site, offering a through-route for pedestrians and limited vehicular access to the servicing yard at the centre of the site. The west site would be served by a single level basement accessed via a one-way ramp at the northern end of Oswin Street. The basement would predominantly sit beneath plot W1 and would contain 34 accessible parking spaces, cycle parking, an energy centre, refuse storage and plant space. The west site would contain three residential towers.

Plot W1

30. This plot would be located on the northern-most part of the site closest to St George's Road and would contain two buildings; a single-storey retail pavilion facing St George's Road (9.35m AOD) and a 20-storey tower (W1) measuring a maximum of 71.9m AOD which would sit to the south of the retail pavilion. At ground floor level the tower would contain 312sqm (GIA) of retail space, a residential entrance from Oswin Street and the entrance to the basement, and there would be 96 flats above, from first floor level upwards. There would be a communal terrace at 15th floor level facing north and west.
31. The retail pavilion would be predominantly glazed, with a flat, metal roof. Tower W1 would be faced with brick set within a pale, reconstituted stone grid, with glazing and grey metal in between. The top of the tower would be capped with a taller storey framed by masonry and decorative metalwork.

Plot W2

32. This plot would be located immediately north of the Tabernacle, facing onto Elephant and Castle, St George's Road and the Peninsula. It would be located 4m from the northern elevation of the Tabernacle, increasing to 15m owing to the stepped footprint of this neighbouring building. It would contain a mixed-use building including two residential towers (W2 and W3) which would provide a total of 286 residential units. The towers would be separated by communal amenity space at first floor level.

33. Plot W2 would incorporate a 3-storey leisure building described in the planning application as a cultural venue, with frontages to Elephant and Castle and the Peninsula. It would provide 2,848sm (GIA) of floorspace and would have capacity for 500 people in what would be the main auditorium at first floor level, and a 300 person capacity in a smaller space on the ground floor. There would be 790sqm (GIA) of flexible retail space within this building, together with residential entrances, plant space and an internal service yard which would be accessed from Pastor Street.
34. Tower W2 would be located on the northern part of this plot and tower W3 on the southern part; both towers would be set back from the Elephant and Castle frontage to align with Pastor Street. Tower W2 would be 24 storeys high (84.7m AOD) with a communal roof terrace at 18th floor level facing north and west. Tower W3 would be 35 storeys high (119.76m AOD) with a communal roof terrace at 27th floor level facing north and east, set back from the boundary with the Tabernacle.
35. Materials proposed within this plot comprise stone cladding for the cultural venue, and a pale reconstituted stone, brick, glazing and metal elements for the towers.

Plot W3

36. This plot would comprise an 8-storey building (24.8m AOD) in the form of a linear block located on the western part of the site, running parallel with Oswin Street. It is described in the submission as the Mansion Block, and at ground and upper ground floor levels it would have a back-to-back arrangement of uses, with residential units fronting Oswin Street and 2,860sqm (GIA) of flexible retail / office space fronting Pastor Street; the upper floors would be entirely residential, containing 116 residential units. The Mansion Block would be set back a minimum of 11m from Oswin Street (from the edge of the existing carriageway) and three inset loading bays and pocket parks would be provided along this street.
37. Materials proposed for this building comprise pale reconstituted stone, two contrasting bricks, and metal elements in a bronze colour.

Table 3: West site summary

Land use	Quantity
A1-A4	1,102 sqm
A1-A4, B1	2,806 sqm
D2	2,848 sqm
Residential	498 residential units (4 x studios, 142 x 1-beds, 296x 2 beds, 54 x 3-beds and 2 x 4-beds).

Phasing

38. The development would be delivered in two broad phases over approximately nine and a half years. The submission advises that work on the east site would start first, and the ES assumes that the shopping centre would be demolished in 2018/2019, although there is no certainty on this at present as it would be dependent on vacant possession of the site and funding for the development being secured. Indicative phasing shows that the basement would be constructed first, followed by plots E1 to E4 in that order, with completion due in October 2022. In June 2023 it is intended that the LCC would decant into the new education building on the east site, with this

process due to be completed by July 2023. Enabling works on the west site would commence in July 2023, with completion due in September 2027. Given the size and complexity of the proposed development there could be some changes to the proposed phasing.

Amendments

39. Amendments have been made to the application and additional / revised information submitted as set out below. *This includes changes made since the application was deferred by the Planning Committee on 16 January 2018.*

Address

40. The application form gives the site address as Elephant and Castle Shopping Centre and the LCC site, and consultation on the application has been carried out on this basis. The applicant subsequently confirmed that 26, 28, 30 and 32 New Kent Road and railway arches 6 and 7 Elephant Road should be included in the east site address, although they were already included in the redline planning application boundary and supporting plans. The address has been updated on the Council's website to include these additional properties.

Correction to original description of development

41. *Phased, mixed-use redevelopment... comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 34 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements...* This change is simply to correct an error on the description of development given on the application form. No changes have been made to the height of the proposed development.

- Changes to the affordable housing offer, fall-back position for the west site and covenant for private housing;
- To develop a vision for Pastor Street to create a cluster of affordable retail units;
- First refusal of a proportion of the leisure space to a bingo operator, on commercial terms.

East site

- 42.
- provision of a pedestrian route to the west of the viaduct next to plot E3, connecting Walworth Road with The Court;
 - omission of 10 accessible car parking bays from the basement (*3 spaces would remain for LCC staff*);
 - revision to the proposed mix of cycle parking stands;
 - provision of a community police office within the basement (*note – the Police have subsequently confirmed that this is no longer required*);
 - changes to landscaping at the Elephant and Castle entrance to Park Route comprising the omission of one of three planters and the removal of bench seating from the two remaining planters;
 - relocation of cycle parking within the public realm;
 - reduction in the footprint of plot E4 at ground floor level;
 - omission of indicative layouts to the Northern Line station box;
 - commitment to provide temporary retail space on Castle Square.

West site

43.

- facing material for the proposed cultural venue changed from Corten steel to cast stone;
- relocation of the main entrance to the cultural venue from the east elevation of the proposed building to the north elevation, facing the Peninsula;
- additional contribution towards childrens' playspace;
- commitment to fund a CPZ review.

Additional information received

44.

- Applicant's update offer setting out proposed changes following the deferral of a decision at the 30 January 2018 Planning Committee;
- submission of a Draft Local Business Support and Relocation Strategy;
- submission of a Basement Impact Assessment;
- submission of larger details showing the impact upon strategic view 23A.1;
- additional archaeology information;
- revised and additional accommodation schedules;
- additional wind microclimate information relating to the Metropolitan Tabernacle and amendments to public realm planters;
- additional drainage information relating to the Metropolitan Tabernacle;
- additional acoustic information;
- equalities addendum and additional equalities information;
- affordable housing addendum
- additional transport information relating to the east site servicing access and impact of providing a bingo hall on the west site;
- revised sustainability document;
- additional overshadowing information relating to West Square;
- additional waste management information;
- submission of verified views relating to the Metropolitan Tabernacle;
- additional daylight and sunlight information relating to the Metropolitan Tabernacle;
- EIA update letter (x 2);
- submission of updated bat activity survey;

Relevant Planning historyElephant and Castle Shopping centre

45. A number of temporary planning permissions have been granted for change of use of vacant office space within Hannibal House to education use, together with change of use applications for units within the shopping centre and external kiosks.
46. 16-AP-0719 - Expansion of existing Cycle Hire Docking Station adjacent to Strata Tower to provide a maximum of 20 additional docking points. Planning permission was GRANTED in March 2016.
47. 15/AP/4122 Application type: Scoping Opinion (EIA) (SCP)
Request for EIA Scoping Opinion for the redevelopment of the shopping centre and London College of Communications site at Elephant and Castle.
Decision date 25/11/2015 Decision: Scoping Opinion - EIA Regs (SCP)

Pre-application advice

48. 14/EQ/0259 Application type: Pre-Application Enquiry (ENQ)
Redevelopment of shopping centre
Decision date 14/12/2016 Decision: Pre-application enquiry closed (EQC)
49. Pre-application advice was provided in advance of the submission of this application, details of which are held electronically by the Local Planning Authority. A number of meetings were held with the applicant and discussions centred around the design of the proposal, transport impacts including servicing, affordable housing, impacts upon existing businesses, and impacts upon the amenity of neighbouring properties.

Relevant planning history of neighbouring sites

Skipton House, 80 London Road, Perry Library, 250 Southwark Bridge Road, Keyworth Street Hostel, 10 Keyworth Street.

50. 15-AP-5125 - Demolition of the existing buildings and creation of basement (plus mezzanine) and the erection of buildings ranging from Ground Floor plus 7 to ground floor plus 39 stories (maximum building height of 146.3m AOD) comprising retail uses (Use Classes A1/A3/A4) and fitness space (Use Class D2) at ground floor, multifunctional cultural space (Use Classes D1/D2/Sui Generis) at basement and ground floor levels, and office use (Use Class B1) and 408 residential units (Use Class C3) on upper levels, new landscaping and public realm, a publically accessible roof garden, ancillary servicing and plant, cycle parking and associated works. The Planning committee resolved to grant planning permission on 12th July 2016, but the s106 agreement has yet to be completed.

The Heygate Estate and surrounding land

51. 12-AP-1092 - 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. Planning permission was granted, following the completion of a s106 agreement, on 27/03/2013.
52. A number of reserved matters applications have since been approved in relation to this outline planning permission and building works are well under way on site. Applications are predominantly residential-led, unless otherwise stated below:

Application reference	Plot	Decision
13/AP/3581	Plot H6	Granted, February 2014
13/AP/3582	MP1 Public Realm	Granted, February 2014
13/AP/3583	Plot H13	Granted, February 2014
13/AP/3584	Plot H10	Granted, February 2014
14/AP/3438	Plot H2	Granted, December 2014
14/AP/3439	Plot H3	Granted, December 2014
15/AP/2572	Plot H12 ("Energy Hub")	Granted, October 2015
16/AP/1697	Park Phase 1	Granted, August 2016
17/AP/0693	Plot H4	Granted, May 2017

17/AP/2269	Plot H5	Granted, September 2017
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Ground floor, Perronet House, Gaywood Estate, Princess Street

53. 17-AP-4651 - Change of use of 12 existing garages / parking spaces to provide retail space (use class A1), café space (use class A3) and ancillary storage / plant and servicing space, together with new glazing and doors to south, east and west elevations. This application appears as item 6.3 on the committee agenda.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

54. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use
 - Equality implications
 - Environmental impact assessment
 - Design, heritage assets and tall buildings including views
 - Density
 - Affordable housing
 - Mix of dwellings
 - Wheelchair accessible housing
 - Quality of accommodation
 - Trees and landscaping
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area
 - Noise and vibration
 - Transport
 - Air quality
 - Ground conditions and contamination
 - Water resources and flood risk
 - Sustainable development implications
 - Archaeology
 - Wind microclimate
 - Health Impact Assessment
 - Ecology
 - Socio-economic impacts
 - Planning obligations (S.106 undertaking or agreement)
 - Mayoral and Borough community infrastructure levy (CIL)
 - Statement of community involvement
 - Other matters
55. An overall assessment of the merits of the proposal appears at the end of the report.

Legal context

56. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan, the Core Strategy, and the Saved Southwark Plan.

57. There are also specific statutory duties in respect of equalities and heritage assets which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

Planning Policy Designations (Proposals Map)

- 58.
- Elephant and Castle Opportunity Area;
 - Elephant and Castle Major Town Centre;
 - Central Activity Zone;
 - 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 (east site only):
 - Archaeological Priority Zone;
 - Air Quality Management Area;
 - Area where a minimum of 35% affordable and 35% private housing is required.
59. The site sits within zone 1 and has a Public Transport Accessibility Level (PTAL) of 6b (excellent). It is located in Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding.
60. Elephant and Castle sits in the background of townscape view 23A.1 looking from the Serpentine Bridge in Hyde Park to Westminster (London View Management Framework 2012).

National Planning Policy Framework (the Framework)

61. National planning policy is set out in the National Planning Policy Framework ('NPPF') which was adopted on 27 March 2012. The NPPF focuses on a presumption in favour of sustainable development, of which there are three strands; economic, social and environmental. The core planning principles include, amongst others, the requirement to 'drive and support development'.

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'

National Planning Practice Guidance

62. On 19 March 2013, the council's cabinet considered whether Southwark's planning policies were consistent with guidance in the National Planning Policy Framework, as required by Paragraph 215. All policies and proposals were reviewed and the Council satisfied itself that those in use were in general conformity with the NPPF. The resolution was that with the exception of Southwark Plan Policy 1.8 (location of retail outside town centres), all local policies and guidance would be saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their

degree of consistency with the NPPF.

The London Plan 2016

63. Policy 2.9 – Inner London
- 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 3.3 - Increasing housing supply
- Policy 3.5 - Quality and design of housing developments
- Policy 3.6 - Children and young people's play and informal recreation facilities
- Policy 3.7 - Large residential developments
- Policy 3.8 - Housing choice
- Policy 3.9 - Mixed and balanced communities
- Policy 3.10 - Definition of affordable housing
- Policy 3.11 - Affordable housing targets
- Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
- Policy 3.13 - Affordable housing thresholds
- Policy 3.16 - Protection and enhancement of social infrastructure
- Policy 4.2 - Offices
- Policy 4.3 - Mixed use development and offices
- Policy 4.4 - Managing industrial land and premises
- Policy 4.6 - Support for and enhancement of arts, culture, sport and entertainment provision
- Policy 4.7 - Retail and Town Centre Development
- Policy 4.8 - Supporting a Successful and Diverse Retail Sector
- Policy 4.9 – Small shops
- 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 5.8 - Innovative energy technologies
- Policy 5.9 - Overheating and Cooling
- Policy 5.10 - Urban Greening
- Policy 5.11 - Green roofs and development site environs
- Policy 5.12 - Flood risk management
- Policy 5.13 - Sustainable drainage
- Policy 5.14 - Water Quality and Wastewater Infrastructure
- Policy 5.15 - Water Use and Supplies
- Policy 5.21 - Contaminated land
- 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 and large buildings
 Policy 7.8 - Heritage assets and archaeology
 Policy 7.11 – London view management framework
 Policy 7.12 – Implementing the London view management framework
 Policy 7.14 – Improving Air Quality
 Policy 7.15 – Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
 Policy 7.19 – Biodiversity and Access to Nature
 Policy 7.21 Trees and woodlands
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy

GLA Supplementary Planning Guidance (SPG)

64. Culture and Night Time Economy (November 2017)
 Affordable Housing and Viability (August 2017)
 Housing SPG (March 2016)
 Central Activities Zone (March 2016)
 Social Infrastructure (May 2015)
 Town Centres (July 2014)
 Sustainable Design and Construction SPG (April 2014)
 Play and Informal Recreation (September 2012)
 London View Management Framework SPG (2012)
 Planning for Equality and Diversity in London (October 2007)

Core Strategy 2011

65. 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 6 - Homes for people on different incomes
 Strategic policy 7 - Family homes
 Strategic policy 9 - Student 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

Southwark Plan 2007 (July) - saved policies

66. 1.1 - Access to employment opportunities
 1.4 - Employment sites outside the preferred office locations and preferred industrial locations
 1.5 - Small businesses
 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
 2.3 - Enhancement of educational facilities

- 2.4 - Educational deficiency - provision of educational establishments
- 2.5 - Planning obligations
- 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
- 3.17 - Listed buildings
- 3.18 - Setting of listed buildings, conservation areas and world heritage sites
- 3.19 - Archaeology
- 3.20 - Tall buildings
- 3.21 - Strategic views
- 3.28 - Biodiversity
- 4.2 - Quality of residential accommodation
- 4.3 - Mix of dwellings
- 4.4 - Affordable housing
- 4.5 - Wheelchair affordable housing
- 4.7 - Non self contained housing for identified user groups
- 5.1 - Locating developments
- 5.2 - Transport impacts
- 5.3 - Walking and cycling
- 5.4 - Public transport improvements
- 5.6 - Car parking
- 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents (SPDs)

- 67. Development Viability SPD (2016)
- Technical Update to the Residential Design Standards SPD (2015)
- Section 106 Planning Obligations/CIL SPD (2015)
- Elephant and Castle Opportunity Area Planning Framework/SPD (2012)
- Affordable housing SPD (2008 - Adopted and 2011 - Draft)
- Residential Design Standards SPD (2011)
- Sustainable Transport SPD (2010)
- Sustainable design and construction SPD (2009)
- Sustainability assessments SPD (2009)
- Statement of Community Involvement (2008)

Conservation Area Appraisals

- 68. Elliott's Row Conservation Area Appraisal (2013)

The New Southwark Plan

- 69. Work is under way to prepare a New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark plan and the 2011 Core Strategy. *The draft plan is now at the Submission Version Stage and no more consultation on the plan will be*

undertaken. It is anticipated that the plan will be adopted *in 2019* following an Examination in Public (EIP). As the NSP is in draft form it can only be attributed limited weight at present.

70. Draft proposal site designation NSP47 within the NSP encompasses the east site, all of the railway arches along Elephant Road, and the LCC site. The site vision requires employment uses (identified as A1, A2, A3, A4, B1 and D1) – to at least the existing level of provision, at least the same amount of education space as is currently on the site, new homes, civic space, public realm enhancements including along the railway viaduct, a new tube station entrance, and high quality active frontages. The draft site designation also advises that a new community health hub may be provided.
71. Design and accessibility guidance provided in NSP47 includes that it is anticipated that the existing shopping centre would be demolished to facilitate a restructuring of the area's layout, that walking and cycle routes should be enhanced, and that comprehensive, mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.

Draft New London Plan

72. Members should also be aware that the draft New London Plan was published on 30 November 2017. However, given that the plan process leading to the adoption of a new London Plan is only just beginning, this should be given very limited weight.

Principle of the proposed development in terms of land use

73. The NPPF sets out the Government's strong commitment to delivering sustainable development. It advises that there are three elements to sustainable development, economic, social and environmental. Sustainable development is the principal theme underpinning both London-wide and Southwark plan policies, where the regeneration of areas such as the Elephant and Castle is of high priority.
74. The site is within the Elephant and Castle Opportunity Area and the London Plan considers Opportunity Areas to be *"the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport accessibility. Typically they can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two, along with other supporting facilities and infrastructure"* (paragraph 2.58). Accordingly, policy 2.13 of the London Plan states that opportunity areas should seek to optimise residential and non-residential out-put and densities, provide necessary social and other infrastructure to sustain growth, and where appropriate, contain a mix of uses. Table A1.1 (Annex 1) of the London Plan gives an indicative employment capacity of 5,000 jobs and a minimum of 5,000 new homes to be delivered in the Elephant and Castle Opportunity Area over the plan period, and table A1.1 further notes that:

"The Area is undergoing major transformation with significant investment in housing and potential for new retail provision integrated with a more efficient and attractive transport interchange. There is scope to create a series of connected public open spaces complemented by environmental and traffic management improvements. Resolution of these and rail related issues are crucial to the successful redevelopment of this southern gateway to central London."

75. The site also sits within the central activities zone (CAZ), the strategic priorities and

functions for which are set out in policies 2.10 and 2.11 of the London Plan; this includes enhancing and promoting the roles of the CAZ based on a rich mix of local and strategic uses.

76. At borough level, the Core Strategy identifies the Elephant and Castle Opportunity Area as one of the Southwark's growth areas where development will be prioritised. Strategic Targets Policy 2 seeks to deliver 4,000 net new homes and 5,000 net new jobs in the opportunity area, and around 45,000sqm of additional shopping and leisure space. The Council's vision for the opportunity area is set out in the Core Strategy, and the first paragraph of the vision reads as follows:

"Elephant and Castle has potential for redevelopment into an attractive central London destination. We will facilitate regeneration of the Elephant and Castle into a more desirable place for both existing and new residents. There will be excellent shopping, leisure facilities and cultural activities. London South Bank University and London University of the Arts will develop further as important centres of learning. Elephant and Castle will continue to be highly accessible from other places in Southwark and London..."

77. The saved Southwark Plan pre-dates the Core Strategy and was adopted in 2007. It identifies a number of proposal sites including 39P which includes the east site but not the west. It sets out a broad range of town centre uses which are required, including a range of D class uses, new homes, new retail, B1 floorspace and a highly efficient transport hub.
78. The Elephant and Castle SPD expands upon the Core Strategy and provides a framework to guide development over the next 15 years (until 2027). The opportunity area is divided into character areas and as stated the site forms part of the central character area. The strategy for this area is to:
- Use development opportunities to redevelop or remodel the shopping centre and expand its appeal to a larger catchment.
 - Provide a range of unit sizes and affordable retail units which are made available to existing occupiers displaced by development from across the opportunity area.
 - Provide a range of arts, cultural, leisure and entertainment uses, including food and drink uses which make a positive contribution to the evening economy.
 - Support the growth of the London College of Communication.
 - Strengthen links between the shopping centre and Walworth Road ensuring that it becomes a key shopping axis.
 - Require developments to be mixed use and introduce active uses at ground level wherever possible.
 - Ensure that development opportunities provide opportunities for existing and future Small and medium sized businesses.
 - Transform leisure opportunities by building a new leisure centre.
 - Make significant improvements to the interchange between buses, tube and rail and increase capacity in the Northern Line station.
 - Replace subways with surface level crossings.
 - Improve east-west pedestrian connections by providing direct links through the shopping centre site and railway viaduct.
 - Take opportunities to activate and soften key public spaces around the central area and provide a new civic space at the front of the shopping centre.
 - Ensure all development and public realm enhancements are of the highest quality to provide a positive perception of the area.

- Use tall buildings to signal the regeneration of the area, help define gateways into the central area and create an interesting skyline. Potential sites for tall buildings include the shopping centre and leisure centre sites. However, they must not detract from heritage assets, including the view of the Palace of Westminster from the Serpentine Bridge.
 - Provide the potential to link key sites, including the shopping centre and leisure centre, within a district CHP/communal heating network.
79. With regard to land use, guidance note SPD21 advises as follows.
80. A redevelopment/remodelling of the shopping centre will be supported. Proposals for the shopping centre site should:
- Support the objective of consolidating the Elephant and Castle as a major town centre.
 - Improve the retail offer by providing a range of types of retail, including comparison goods floorspace.
 - Provide a range of unit sizes and affordable retail units which are made available to existing occupiers displaced by development.
 - Increase the number of employment opportunities on the site and ensure that there is no net loss of non-residential floorspace.
 - Provide a range of arts, cultural, leisure and entertainment uses, including food and drink uses which make a positive contribution to the evening economy.
 - Introduce residential use as part of mixed-use development where feasible.
 - Provide space for an increase in the capacity of the Northern Line ticket hall.
81. The above sets out the strong support for a high density, mixed-used development on this large brownfield site at all levels of planning policy. The proposed development would fully accord with the principle of accommodating large-scale development within opportunity areas, and would deliver many of the key objectives set out in the SPD for the central character area, and these are discussed below in the relevant sections of this report.

Provision of retail floorspace

82. The London Plan identifies Elephant and Castle as a district town centre; district centres are defined as typically containing 10,000-50,000sqm of retail, leisure and service floorspace. It notes that the centre has a high potential for growth, with the potential to change to a major town centre where retail, leisure and service floorspace is generally over 50,000sqm. Policy 2.15 of the London Plan 'Town Centres' sets out the strategic requirements for town centres including sustaining and enhancing the vitality and viability of the centre, accommodating economic and / or housing growth in appropriate locations, and supporting and enhancing the competitiveness, quality and diversity of town centre retail, leisure, employment, arts and cultural uses.
83. Strategic policy 3 of the Core Strategy 'Shopping, leisure and entertainment' already identifies Elephant and Castle as a major town centre owing to the potential increase in retail floorspace expected over the next 20 years. It advises that there is currently 69,000sqm of retail floorspace within the town centre, and that the Council will enable the provision of around 45,000sqm of additional shopping and leisure floorspace at Elephant and Castle / Walworth Road, focusing on the provision of new non-food shopping and strengthening its role as a major town centre.

84. This is reinforced through the Elephant and Castle SPD, guidance note SPD1 of which advises that the Council will work with the landowner to transform the shopping centre through redevelopment or remodelling, supporting the introduction of new large 'anchor tenants' and promoting a wider mix of retail uses to strengthen the appeal of the town centre to a wider catchment.
85. There is currently 15,132sqm (GIA) of retail floorspace on the east site which includes the shopping centre, the railway arches, and the newsagents on New Kent Road. There are also approximately 35 market stalls and 3 retail kiosks outside the shopping centre. Concerns have been raised following public consultation on the application that no breakdown of the existing retail uses has been provided and that it not clear whether the proposal would comply with saved policy 1.7 of the Southwark Plan which requires A class floorspace to be retained.
86. The proposal would deliver between 3,102 and 5,908sqm of additional retail floorspace within use classes A1-A4, depending on whether the flexible space were occupied by retail uses. It is noted that on the east site there would only be around 2,000sqm of additional retail space, but this should be considered in the light of the proposed relocation of the education building from the west site to the east site, taking up floorspace which could otherwise have been used for retail purposes. Moving the education building to a more prominent and accessible location on the east site is considered to be a significant positive aspect of the scheme, and the improvements to the public realm and pedestrian permeability on the east site with the creation of two new streets are also noted. Across both parts of the site there would be an increase in retail floorspace which would be in accordance with the London Plan, the Core Strategy, the Saved Southwark Plan, and the Elephant and Castle SPD. Although figure 5 in the Elephant and Castle SPD identifies the west site as being predominantly for educational uses including halls of residents, all of the uses proposed on this part of the site would be appropriate town centre uses in policy terms.
87. The majority of the retail and leisure floorspace would be located on the east site within a new shopping centre. It would have excellent connections to retail coming forward on the redeveloped Heygate Estate and along Walworth Road, the retail frontage of which is being extended northwards towards the shopping centre to create a continuous retail street. The Elephant and Castle SPD seeks to reinforce the continuity of the retail frontage on Walworth Road, and the proposal would help to deliver this. New retail would also be provided on the west site and as this too forms part of the town centre, this would be acceptable in principle.
88. Responses to public consultation on the application suggest that the existing shopping centre could be refurbished rather than demolished and the site redeveloped. In reality however, refurbishment would be less likely to deliver the significant public realm improvements which the SPD requires in and around the site, or connections through it. Moreover, the existing shopping centre is dated and of a poor quality. There has been little investment in it in recent years, owing to the long term intention of the current and previous owners for a wholesale redevelopment of the site. The SPD anticipates significant regeneration as the best solution to the site.
89. The Elephant and Castle SPD advises that the proportion of shops which sell comparison goods (music, clothes, books etc.) at Elephant and Castle is very low compared to other UK town centres, and that it appeals to a fairly small catchment area. The SPD advises that in general, Southwark's town centres are not meeting the needs of the borough's residents. The Elephant and Castle SPD advises that only around 16% of available expenditure in the borough for comparison goods is actually

spent in the borough, with many people travelling to the West End, Croydon and Lewisham to shop. Although comparison expenditure in the borough has increased since the SPD was adopted, a retail study completed on behalf of the Council in June 2015 (the Southwark Retail Study) advises that just under 50% of comparison goods spend is made outside the borough. The redevelopment of the site to include a new shopping centre presents an opportunity to claw some of this back, and although the uplift in retail floorspace would not be significant, the floorspace would be of a higher quality and could be designed to suit the needs of modern, comparison retailers.

90. Concerns have also been raised following public consultation that the lack of investment in the shopping centre has adversely affected trade and that it is being deliberately run down. Whilst there may be some validity to this observation, the Council is not the landlord for the shopping centre, and is therefore very limited in what it can do to improve this situation. It is also noted that in planning policy terms the shopping centre has been identified for redevelopment or remodelling for a number of years, and the applicant has advised that a number improvements have recently been made including new lighting, music, additional cleaning, and new refuse and recycling systems.

Retail impact and scale

91. Saved policy 1.7 of the Southwark Plan requires the impact of the scale, vitality and viability of new retail floorspace to be considered. It advises that in town centres the LPA will permit developments providing a range of uses including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment (Class B1) uses, where the following criteria are met:
 - i. The scale and nature of the proposal is appropriate to the character and function of the centre and the catchment area it seeks to serve; and
 - ii. The proposal will not harm the vitality and viability of the centre; and
 - iii. A mix of uses is provided where appropriate; and
 - iv. Any floorspace currently in A Class use should be retained or replaced, unless the proposed use provides a direct service to the general public and the proposal would not harm the retail vitality and viability of the centre (where the proposal site is located within a protected shopping frontage, the proposal should comply with Policy 1.9); and
 - v. The proposal would not materially harm the amenities of surrounding occupiers; and
 - vi. Where developments which are likely to attract a lot of people are proposed, the site should be highly accessible by sustainable modes of transport; and
 - vii. The road network has sufficient capacity to take any additional servicing traffic generated by the proposal without causing adverse effects on the environment, traffic circulation, or air quality; and
 - viii. The development addresses the street, provides an active frontage on pedestrian routes and would not erode the visual continuity of a shopping frontage; and
 - ix. The proposal provides amenities for users of the site such as public toilets, where appropriate.
92. The Core Strategy and the Elephant and Castle SPD support the delivery of an additional 45,000sqm of retail and leisure floorspace in Elephant and Castle major town centre. Some 17,551sqm of retail floorspace has already been consented in the opportunity area and has either been completed or is under construction. This, together with the net increase on the application site would result in 23,495 sqm of

new retail floorspace within the opportunity area which would significantly strengthen the role of Elephant and Castle as a town centre in accordance with the Core Strategy and SPD vision.

93. Whether the 45,000sqm is still an appropriate quantum has been tested through the Southwark Retail Study which was undertaken on behalf of the Council as part of the evidence base for the NSP. The redevelopment of the shopping centre has been tested in terms of growth and its impact on surrounding centres and it is not anticipated that there would be any detrimental impact on the vitality and viability of other town centres as a result of the proposed development.

Location, size and mix of retail units

94. The location of the proposed retail units, predominantly in a new shopping centre on the east site including active retail frontages to Elephant and Castle and Walworth Road is considered to be acceptable. The retail on the west site would help to activate the peninsula, St George's Road and the northern end of Oswin Street. The extended Pastor Street would be lined with active uses which would help to create a vibrant piece of townscape.
95. The retail units shown on the plans range from 30sqm to 776sqm, although they would be flexibly designed to enable the sizes to be modified to suit end-user requirements, and could include a large anchor store alongside smaller units.
96. Policy 4.9 of the London Plan 'Small shops' advises that in considering proposals for large retail developments the Mayor and boroughs should, consider imposing conditions or seeking contributions through planning obligations where appropriate, feasible and viable, to provide or support affordable shop units suitable for small or intermediate retailers and service outlets and / or to strengthen and promote the retail offer, attractiveness and competitiveness of centres; the Mayor's Town Centre SPG defines small shops as those with a gross floor area typically up to 80sqm. There are currently 45 units within the shopping centre which are less than 80sqm.
97. Guidance note SPD1 of the Elephant and Castle SPD requires retail developments of over 1,000sqm to provide a range of shop and unit sizes, including affordable units. It requires at least 10% of new retail floorspace (GIA) be made available as affordable for small and medium-sized enterprises in the opportunity area which have been displaced as a result of development, new business start-ups or independent retailers (this is the SPD eligibility criteria). Suitable businesses should have 3 units or less, and rents should be discounted by not less than a total reduction of 40% below market rate averaged over a 5 year period. The SPD advises that a sequential approach will be adopted when considering affordable retail units, with the preference for them to be delivered on-site. If this is not feasible or viable then off-site provision should be considered. Where affordable units cannot be provided, the SPD advises that the Council will seek financial contributions through planning obligations to provide the mitigation necessary to support retail diversity in the town centre or the rest of the borough.
98. The proposed development would provide 18,234sqm of retail floorspace across both sites, resulting in a requirement for 1,823.4sqm of affordable retail space. There would also be 2,806sqm of flexible floorspace which could be used for retail and office purposes, and if it were all used for retail this would add a further 281sqm to the affordable retail requirement, taking the total to 2,104.4 sqm.

99. The proposal would provide 10% on-site affordable retail space, – i.e. 10% of the retail space coming forward on the east site would be affordable and 10% of the retail space coming forward on the west site would be affordable. This is an updated offer from the applicant as it was originally proposed to provide 5.3% on-site affordable retail, with an in-lieu contribution to make up for the shortfall. Many of the public consultation responses objected to this and requested the full 10%. Some responses state that both the 10% and an off-site contribution should be provided. However, as 10% affordable retail would be provided on-site, there is no basis in planning policy or guidance to require a contribution as well.
100. Clauses to secure an affordable retail strategy including its location, unit sizes and specification should be included in the s106 agreement. It is recognised that the on-site provision would not be sufficient to replace all of the small shops currently on the site, but within the wider opportunity area some 1,762sqm of affordable retail has already been consented. This comprises 411sqm in Elephant One and 1,351sqm on the redeveloped Heygate Estate. 81sqm of affordable retail has been provided at Strata and Dashwood House, although this has already been occupied by independent traders from the shopping centre.
101. With regard to the mix of units, the submission advises that the tenant mix for the proposed shopping centre would be heavily represented by convenience retailers, supported by modern fashion and comparison retailers. It would provide modern, fit-for-purpose retail space including facilities for click and collect, cafes and restaurants which would help to support the evening economy. To ensure that there would be an appropriate mix of A1-A4 uses a condition is recommended requiring 50% of the retail units to be used for A1 purposes, and an affordable retail strategy which should be secured through the s106 agreement could make provision for small units. A condition is also recommended requiring details of provision for public toilets to be submitted for approval. This is considered to be an appropriate site and development for such a facility, and the condition would address part ix of saved Southwark Plan policy 1.7.
102. Overall, the principle of providing additional retail space, its impact, scale and location are considered to comply with the provisions of the development plan, and the provision of 10% on-site affordable retail space would meet the expectations set out in the Elephant and Castle SPD. The new shopping centre would help to deliver a vibrant and lively town centre and is welcomed.

Provision of D class floorspace

103. Paragraph 17 of the NPPF outlines the 12 core land-use planning principles that should underpin planning decision making and states this should '*deliver sufficient community and cultural facilities and services to meet local needs.*' Paragraph 27 recognises the role of cultural facilities in ensuring the vitality of city and town centres; and paragraph 70 states that in 'promoting healthy communities', planning decisions should '*plan positively for cultural buildings*' and '*guard against the loss of cultural facilities and services*'.
104. Policy 4.6 of the London Plan supports the enhancement of arts, culture, sport and entertainment facilities. It cross-refers to policy 4.7 of the London Plan which advises that these types of uses should be focussed on sites within town centres, and that they should be on sites with good existing or planned public transport, they should be accessible to all sections of the community including disabled and older people, and should address deficiencies in facilities and provide a cultural focus to foster more sustainable local communities.

105. Policy 4 of the Core Strategy advises that there will be a wide range of well used community facilities that provide spaces for many different communities and activities in accessible areas. In the Core Strategy community facilities include medical and health centres, sports, leisure and recreation facilities, and facilities for the provision of education; these fall within use classes D1 (non-residential institutions) and D2 (assembly and leisure).
106. Saved policy 2.1 of the Southwark Plan advises that planning permission for a change of use from D class community facilities will not be granted unless the applicant can demonstrate that the facility is surplus to the requirements of the local community or that the replacement development meets an identified need, or that another locally accessible facility with similar or enhanced provision can meet the identified needs of the local community facility users. Although no change of use is proposed, this policy could be applied to proposals to demolish existing community facilities. Saved policy 2.2 of the Southwark Plan advises that planning permission will be granted for new community facilities provided they can be used by all members of the community, and they do not cause any loss of amenity to present or future occupiers; where a development would generate more than 20 vehicle trips at any one time, a Transport Assessment is required.
107. There is strong support in the Elephant and Castle SPD for new leisure uses. The vision for the opportunity area advises that there will be excellent shopping, leisure and cultural facilities, and Theme 1 of the SPD: Town Centre: Shopping, business and hotels seeks to improve the evening economy and the variety of the arts, cultural and entertainment offer by providing more cafes and restaurants as well as supporting leisure and cultural facilities.
108. At present there is 43,625sqm (GIA) of D class floorspace on the site which would increase to 47,148sqm, an increase of 3,523sqm which is welcomed. This would be acceptable in principle in relation to the town centre policies of the NPPF, the London Plan and Southwark's policies. It is recognised that there are changes to the leisure uses and a net reduction of leisure uses. Overall the D class floorspace increases but the leisure elements within that reduces. This is considered below against the aspirations of the SPD that leisure uses should be an important component of the town centre mix. The proposed new D class floorspace is set out below, and in order to ensure that it would be delivered, it is recommended that clauses be included in the s106 agreement requiring it to be completed before a proportion of the residential accommodation can be occupied. This is to ensure that there would be a vibrant, mixed use development as required by the Elephant and Castle SPD.
109. *Concerns have been raised that the proposal would result in the loss of the 'Tesco' space at first floor level in the shopping centre, which contains a number of rooms which have been used informally for dance classes, yoga and community meetings, and that the loss of this space would represent a significant loss to the community.*
110. *The lawful use of this space is not known, but officers recognise that it is used for the purposes described above. The proposed development would provide new leisure and education floorspace, and a condition for a community use strategy for these spaces is recommended.*

London College of Communications / education floorspace

111. The proposed development would deliver new education floorspace. If permission is

granted it would be for general education floorspace, although the planning application advises that it is intended for the London College of Communications and has been designed in conjunction with them. The college serves over 5,800 full and part-time students and 454 (full-time equivalent) staff at its current home on the west site, and specialises in creative courses in fields such as journalism, publishing, film, television and sound, graphic communication and photography. It is an important asset to the opportunity area attracting large numbers of visitors to the area in addition to the students, and forms part of a hub for the creative clustering which is apparent in the Elephant and Castle area. The college, together with London South Bank University which is located on London Road approximately 170m from the west site, form Southwark's university quarter, providing excellent opportunities for learning and innovation.

112. Policy 4.10 of the London Plan advises that boroughs should give strong support to London's higher and further education institutions and their development, and strategic objective 1B of the Core Strategy 'Achieve educational potential' advises that Southwark will be a place that creates positive futures by building, redeveloping and improving educational facilities with good access for everyone. This is reinforced through strategic policy 4 of the Core Strategy and saved policy 2.4 of the Southwark Plan, the latter of which advises that planning permission will be granted for new educational establishments, especially in areas of demonstrated educational deficiency, provided opportunities are taken wherever possible to ensure that provision is made to enable the facility to be used by all members of the community.
113. The proposed development would deliver new education floorspace intended to be a new home for the LCC, in a prominent position at the heart of the town centre. It would be closer to both tube stations making it more accessible for students, staff and visitors, and it would have excellent connections with the new Elephant Park. The proposed building has been designed in conjunction with the college to help to realise their ambitions for a new, modern and flexible educational facility in Elephant and Castle. The brief for the building includes making it more open and accessible to the local community, flexible space for exhibitions, events and the Stanley Kubrick archive, and sufficient space to accommodate UAL's core university service at the site including its international language centre, training, conference and student union facilities. The building would incorporate a 3-storey exhibition space for student work and archive collections, and which could also be rented by the local community; it is recommended that this be secured through the s106 agreement or by a planning condition.
114. The London College of Communications currently supports 454 jobs which could increase to approximately 900 as a result of the proposal (an increase of 446 jobs). The London Plan recognises that London's universities make a significant contribution to its economy and labour market. A report by Universities UK 'The Economic Impact of the London Higher Education Sector' (2014) advises that total revenue of London higher education institutions was £5.8 billion in 2011-2012, and that through knock-on effects they generated an additional £7.9 billion in other industries throughout the UK, with the majority (£5.9 billion) in London. The proposed development would provide a new education campus which is likely to be used by the London College of Communications, helping to secure its place in this part of the borough.

Although the proposal would deliver general education floorspace and would not be personal to LCC, LCC has submitted the following statement setting out its commitment to remaining in the borough:

“The Elephant and Castle Town Centre Regeneration Scheme offers UAL a unique opportunity to provide a much-needed new building for London College of Communication whilst remaining in Southwark, which has been home to the college for over half a century. A regeneration scheme of this size is obviously complex and challenging in balancing the needs of different groups. UAL is investing heavily in Southwark's future as an educational and creative business district. This new site will build Southwark's existing capacity for the digital technology industries, bringing design and gaming, TV and film into a new creative hub. This offers new possibilities which will benefit many different communities within Southwark and is a proposition unique to this scheme.

Plans for UAL's cutting-edge new building for London College of Communication and its core university services, including expanded space for public exhibitions and events, are a key part of the proposed scheme. These new facilities will not only benefit our students, staff and alumni but enable the College to continue its ongoing work with local communities, neighbours, partners and schools.

UAL has undertaken extensive internal consultation to ensure the proposed new building is fit-for-purpose and meets the College's unique teaching and learning needs and we have received positive feedback in relation to this. This includes over 100 collaborative workshops to date with staff and students in the college and the wider University. In addition, specific student groups have been invited to undertake projects as part of their normal studies to inform the concept design.

We are aware that individual members of the UAL and LCC community have raised some concerns over the proposed development as a whole via the planning process. While the university respects their right to express their opinions and supports the democratic process of planning, UAL and the London College of Communication remain committed to this scheme and our place within it. We look forward to continuing to work with the local community and making best use of these new opportunities together.”

115. The provision of this facility would help to secure the college's long-term future in the area, and is a significant positive aspect of the scheme. In order to ensure that there would be no loss of education floorspace during construction, it is recommended that a clause be included in the s106 agreement preventing the existing college from being demolished until / unless the new building has been completed.

Proposed multi-screen cinema

116. The planning application advises that the main leisure offer within the proposed development would be a multi-screen cinema, although other leisure uses could come forward if there were demand. The Southwark Retail Study also considers demand for leisure uses until 2031, and advises that a significant proportion of cinema trips from residents in the borough (approximately 60%) 'leak' to other destinations; it advises that by 2031 there could be demand for 22 cinema screens in the borough. The socio-economic chapter of the ES advises that market research shows that there is significant demand for a 12-15 screen cinema in the catchment area of the proposed development.
117. At present the borough has 16 large cinema screens providing 3,735 cinema seats, together with three small, independent cinemas which are Roxy in Borough High Street, the Wave on Bermondsey Square, and East Dulwich Picture House on Lordship Lane; together these add a further 5 screens to provision in the borough.

The proposal could add a further 8 screens which would meet the identified demand and help to retain more cinema trips in the borough.

118. The Elephant and Castle SPD seeks to increase the use of the area during the evenings and the proposed cinema would help to achieve this, and would complement the proposed food and drink uses within the new shopping centre.

Proposed cultural venue

119. The second element of the new D class floorspace is the proposed cultural venue which would be located on the west site. As stated if permission is granted it would be for general leisure floorspace, but it has been designed to be a multi-functional space which would occupy a prominent position in the area, with a frontage to Elephant and Castle and facing the Peninsula. The ground floor would comprise a lobby with ticketing and reception desk, a 300 capacity event space and ancillary spaces which could be used as recording studios and rehearsal space. At first floor level there would be a foyer, bar and entrance to the main performance space which would have capacity for 500 people. This facility would be acceptable in land use terms and would activate this prominent corner of the site. It is considered that this would be a very positive addition to the heart of the town centre.
120. Although there would be an increase in D class floorspace as a result of the proposal, with the exception of the LCC, all of the proposed D class uses would be different from those which currently exist at the site. There would also be less leisure floorspace than at present. Overall D1 floorspace would increase from 31,553 sqm to 41,405sqm, an increase of 9,852sqm through the new education building, and D2 floorspace would decrease from 12,072sqm to 5,743sqm, a decrease of 6,329sqm. The reduction in leisure floorspace has been raised as a concern during public consultation on the application, both in terms of the reduced quantum and the provision of a narrower range of leisure activities than currently exists. It is acknowledged that this reduction is a disadvantage of the proposal given the aspirations of the SPD that leisure should be an important component of the town centre uses. Concerns have also been raised during public consultation on the application that many elderly people use the bingo hall and younger people and children use the bowling alley, both of which would both be lost, and this is considered below and in the equality implications section of this report.
121. The loss of each of the existing D class uses is considered in turn below.

Bingo hall

122. The bingo hall in the shopping centre occupies 5,299sqm of floorspace and has capacity for approximately 2,000 players. It is open seven days a week and an equality analysis by AECOM advises that it is used by approximately 650 customers per day. There is currently one other bingo hall in the borough, Gala Bingo in Surrey Quays Leisure Park which is approximately 2.4 miles from the site. The Southwark Retail Study advises that the borough could support two or three bingo facilities, which suggests that the existing provision meets the current and likely future demand.
123. The proposed development does not specifically include a new bingo hall, therefore the proposal is likely to result in a shortfall against predicted demand. Demand for the bingo use would therefore either have to be met by other facilities, and whilst there is currently a bingo hall at the Surrey Quays Leisure Park, it is not known whether this would be retained through the redevelopment of Canada Water town centre. There

are other bingo halls further afield, some of which are listed below:

- Mecca Bingo in Camden (3.6 miles from the site);
- Mecca Bingo in Catford (4.8 miles from the site)
- Gala Bingo in Stratford (5.2 miles from the site) and
- Gala Bingo in Tooting (5.4 miles from the site).

124. In planning terms there would be nothing to preclude the new leisure floorspace within the development from being used for bingo purposes if an operator were to come forward, but there are not considered to be any development plan policy grounds for requiring the specific bingo use to be replaced. Although saved policy 2.1 of the Southwark Plan seeks to protect D class uses, it is worded in terms of requirements and need, rather than demand. Whilst there is clearly a demand for the facility, there is not a need for it in the same way that there may be a need for a dental or doctors' surgery. Comments have been raised during public consultation that the bingo hall is afforded protection under NSP policy 1, 'Social Regeneration' (now policy SP2). However, as stated the NSP is in draft form and can only be attributed limited weight at present. The current wording of policy SP2 would not in any event support retaining this use.
125. Notwithstanding land use issues, the bingo hall is clearly a popular and well-used facility. An Equality Analysis undertaken by AECOM on behalf of the Council identifies that a high proportion of elderly people and people from Black, Asian and Minority Ethnic (BAME) backgrounds use the facility, and its loss could result in adverse equality implications. *In recognition of this and as an amendment to the proposal, the applicant has agreed to give first right of refusal to a bingo operator, on commercial terms, to lease a proportion of the leisure space within the development, and this is considered in full in the equality implications section of this report.*

Bowling alley

126. The Palace Superbowl within the shopping centre has 26 lanes and is open 11am to 11pm daily. A survey of the facility suggests that it is used by around 440 people per week (AECOM report), and the operator has advised that there are currently one hour waiting times for bowling at the weekends.
127. There is another bowling facility in the borough, the Hollywood Bowl which is also in Surrey Quays Leisure Park and has 28 lanes, although it is not known whether this would stay if the site is redeveloped. The Southwark Retail Study advises that by 2031 there could be demand for 29 lanes and there are currently 54. As such the report concludes that the existing bowling facilities in the borough are more than adequate to meet demand for the foreseeable future. Following the loss of the bowling at Elephant and Castle there would only be 28 lanes, one short of the predicted demand. This is not considered to be a significant shortfall, although it is noted that people would have to travel further afield. However, with the improvements to the Northern Line ticket hall, travel to this alternative facility by tube should be easier. It is also noted that if permission is granted, a bowling alley could be provided within the development without the need for further planning permission.

Coronet Theatre

128. The Coronet Theatre is a 3-storey building which was constructed as a theatre in 1879. A review of its planning history reveals that it was converted to a cinema in the

1930s, and went on to be used as a nightclub in around 2000 following the granting of a lawful development certificate for that use (reference: 00/AP/1315). The building appears to have operated as a nightclub ever since, with a capacity of 2,800, until it closed in January this year. It hosted around three events per month, and a review of its website for August 2017 listed four events which all appeared to be club nights. Concerns have been raised that the month of August was quiet for the Coronet, and that in October it held 14 events, including club nights, live music and comedy nights.

129. Objections to the application on the grounds of the loss of the Coronet have been received from the Theatres Trust, the Cinema Theatre Association and neighbouring residents. Reasons for objecting include that the Coronet remains a viable and valuable operation, that cities need a range of facilities and venues, and that it is identified as one of only four remaining music venues in the area. The objections advise that the Council should be satisfied that there is no longer a demand for this type or size of cultural facility in the area.
130. The Coronet is identified as a grassroots music venue in a 2015 GLA report 'London's Grassroots music venues rescue plan'. Grassroots music venues are given a broad definition in this document, which includes venues with a fixed or temporary stage, a defined audience space, sound booth, ticket hatch, equipment to facilitate live music, and employing people in roles such as sound engineers, bookers, promoters and stage managers. The rescue plan advises that between 2007 and 2015 London lost 35% of its grassroots music venues, and the plan is referenced in the Mayor's 'Culture and night time economy' SPG.
131. Nightclubs are classed as Sui Generis uses, which means that they do not sit within any particular use class; theatres are also classed as Sui Generis. Whilst there are no policies in the saved Southwark Plan or Core Strategy which specifically protect Sui Generis uses, there is strong protection at all levels of planning policy for a range of cultural, leisure and entertainment uses in town centres, and the NPPF definition of main town centre uses includes nightclubs and theatres. The Mayor's Central Activities Zone SPG advises that arts, cultural, tourism and entertainment activities are integral to the function and distinctive character of the CAZ and its mix of daytime, evening and night time uses. The town centre policies in both the Core Strategy and the Southwark Plan seek to provide a range of leisure uses, of which nightclubs form a part.
132. No information has been provided regarding the demand for this type and size of venue in the area, and the proposal does not include a replacement nightclub. The GLA in its stage 1 report notes that the venue is a large-scale and positive contributor to the local night time economy, and that its displacement is disappointing in some respects. The Theatres Trust considers that the Southwark Playhouse and a proposed 350 seat capacity auditorium in Skipton House should not be considered as mitigation for the loss of the Coronet, because Southwark Playhouse replaces an existing theatre and is only in the area on a temporary basis, and the space planned for Skipton House has no clear purpose, no operator, and could not be a live music venue of the nature of the Coronet. The Trust considers that any replacement should be a fit-for-purpose facility of an equivalent size, and that the proposed cultural venue would not be a suitable replacement.
133. If permission is granted it would be for general leisure floorspace, although it is noted that the application describes a cultural venue on the west site. This would clearly not be a replacement for the existing nightclub in terms of its size, and the applicant has advised that it is not intended as such in any event. It would be of a much smaller

scale than the Coronet, and the plans incorporate music rehearsal and recording studios with the potential for events to be held every night to complement the creative uses at the LCC.

134. The GLA stage 1 report concludes that the benefits arising from the proposal including the delivery of a new shopping centre, a new building for the LCC, new leisure floorspace, transport infrastructure and a significant quantum of new housing would outweigh the loss of the nightclub. It advises that the proposed uses would complement other night time uses coming forward in the vicinity including at Skipton House and a new theatre on Newington Butts as part of the 360 Tower development. Whilst it is recognised that the loss of this facility would impact upon the local night-time economy, the proposal would provide a modern leisure offer, likely to be in the form of a cinema and cultural venue, and the lower floors of the education building would be publically accessible and capable of delivering a cultural function for the area. The nearest alternative nightclub is Corsica Studios, an independent arts, live music and club venue which has operated from Arches 4 and 5 Elephant Road for the last 15 years and has capacity for 500 people. Corsica Studios is also identified as a grassroots music venue in the Mayor's Culture and night time economy SPG, and although not a grassroots venue, the Ministry of Sound nightclub is approximately 320m from the site on Gaunt Street. *La Bodeguita and Distriandina are also understood to operate as restaurants / cafes during the day and late night club venues in the evening, although these are both within the application site and the premises which they currently operate from would be demolished. As set out in the equality implications section of this report, however, as independent businesses, they would be eligible for relocation assistance.*
135. In the event that planning permission is granted, the Theatres Trust, supported by the Cinema Theatre Association, has recommended that a number of obligations be secured in relation to the proposed cultural venue. These include that the operator be involved in its design, the implementation of a management plan detailing the programme and minimum number of public facing performances, provision of funding for fitting the venue out, that the bar and ancillary spaces be managed by the venue operator, and that the venue is leased at an affordable rent.
136. The intended phasing for the proposed development is such that the proposed west site leisure floorspace would not come forward for at least 8 years, therefore it is not considered to be appropriate to expect an operator to have been secured at this stage. The applicant has advised that the design of the building has been informed by dialogue with prospective occupiers as well as in-house specialists at the project architects (Allies and Morrison) who have experience of working on similar projects across London including the Festival Hall. The servicing of the venue, access, layout and technical and performance requirements have all been taken into account and reflected in the plans, but it has been flexibly designed so that changes could be made to suit end-user requirements in the future.
137. It is however, considered appropriate to secure the provision of a Cultural and Operational Management Plan, and a clause to this effect has been included in the draft s106 agreement; this could include details of the management of ancillary facilities such as the bar. Regarding fit-out costs and reduced rents, the applicant has advised that these have not been factored into the scheme viability; as set out below in the affordable housing section of this report, the applicant's offer in respect of affordable housing and other contributions is considered to be the maximum which the development could viably support.

138. Although there would be no loss of a theatre arising from the proposed development, there are other theatres in the opportunity area. This includes Southwark Playhouse which is approximately 330m to the north-east on Newington Causeway, although it is noted that this is a temporary location and it is understood that the theatre will move back to its former home in London Bridge. In addition there is a 713sqm theatre being delivered as part of the 360 Tower development on the site of the former London Park Hotel; this is some 200m to the west of the Coronet.

Dental surgery

139. This is located at 32 New Kent Road is understood to have 3 dentists. Policy 3.16 of the London Plan seeks to protect and enhance social infrastructure, and advises that proposals which would result in the loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted; it requires the suitability of the space for other forms of social infrastructure to be considered. This is reinforced through saved policy 2.1 of the Southwark Plan.
140. The proposed development does not include any replacement floorspace for the existing dental surgery (it is noted that paragraph 4.47 of the ES erroneously advises that a health centre is proposed in plot W2). Chapter 7 of the ES which considers socio-economic impacts advises that in 2014-2015 there were 19 dentists and 9 dental practices within 1.5km of the site. Of these practices, eight were accepting both fee paying and fee exempt patients. The ES advises that the patient per dentist average in Southwark is 20% lower than the national average and 6% lower than London as a whole, suggesting that there is a degree of surplus capacity. In light of this officers raise no objections to the loss of the existing dental surgery in this instance, particularly given the significant increase in D class floorspace overall.

The School of Management Sciences and a language school

141. These are understood to be located in Hannibal House and railway arch, 7 Elephant Road respectively. As stated the proposal would result in additional education floorspace on the site, and it is intended that the LCC international language school would be incorporated into the new education building. It is noted that this may not be directly comparable to what currently exists on the site, although there are nine other language schools within a mile of the site.

Community organisations

142. The ES advises that there are five community organisations on the east site, although only one of these, Community Action Southwark Volunteering Centre which is located in the shopping centre, is fully accessible to the public. The other four are described in the ES as non public-facing offices. Again, although no replacement floorspace is proposed for these organisations, the overall quantum of D class floorspace would increase which in policy terms would be acceptable. The ES advises that Community Action Southwark has plans to relocate less than a mile away. The remaining four organisations include charities, and these are considered in the equality implications section of this report.

Conclusion on D class floorspace

143. Although there would be a reduction in leisure floorspace on the site and a narrower range of leisure facilities, the overall quantum of D class floorspace would increase.

The bingo and bowling are clearly very popular facilities, but in land use terms there is no requirement to replace these specific uses and there is not considered to be any conflict with the development plan in this respect (*although it is noted that the applicant's updated proposal includes offering first refusal of a proportion of the leisure space to a bingo operator*). That said, it is acknowledged that the reduction in leisure is a disadvantage when assessed against the aspiration of the SPD that leisure should be an important component of the town centre uses. There would also undoubtedly be temporary, adverse effects on leisure provision during the construction period following the demolition of the existing facilities, but this would be temporary in nature.

Office space (use class B1)

144. Policy 4.2 of the London Plan seeks to consolidate and strengthen the diverse office markets in London by promoting their competitive advantages, focussing new development on viable locations with good public transport, and enhancing the business environment through mixed use redevelopment.
145. Strategic policy 10 of the Core Strategy seeks to protect existing business floorspace in certain locations including the CAZ, town centres and action area cores, and proposal site designation 39P in the saved Southwark Plan requires a minimum of 45,000sqm of B1 space within the opportunity area. Saved policy 1.4 of the Southwark Plan also affords protection to existing business space in certain locations, but it also allows it to be replaced with A class or other town centre uses where sites are in a town centre. This is repeated in policy SPD4 'Jobs and Businesses' of the Elephant and Castle SPD.
146. There is currently 10,699sqm (GIA) of office floorspace in Hannibal House, approximately 2,000sqm of which (9 office suites) are vacant. The submission advises that much of it is of poor quality and dated, does not suit modern occupiers' space standards or layout requirements, and would require significant upgrading to meet modern requirements. The office space supports up to FTE 638 jobs.
147. The proposed development would include 2,860sqm of flexible floorspace on the west site which could be used for A1-A4 and B1 purposes. The submission advises that it would be flexibly designed to support new business and potential spin out companies from the LCC, and the applicant has advised that up to 10% of any new B class floorspace on this part of the site would be affordable. This would use the same SPD definition as for affordable retail, and would be available in the first instance to small and medium businesses and charities within Hannibal House which would be displaced, followed by new business start-ups, registered charities and businesses which employ less than 10 staff. Concerns have been raised during public consultation that the proposal would only provide *up to* 10% of this space as affordable, but as this is not a policy requirement there is no scope to require that 10% be provided.
148. If all of the flexible space were used for B1 purposes there would be a loss of 7,863 sqm of B1 floorspace as a result of the proposal. If it were all used for retail purposes there would be a total loss of office floorspace on the site, although it is noted that the LCC building would incorporate an element of office floorspace. However, the proposal would provide 68,188 sqm of new town centre uses comprising retail and D class floorspace, significantly more than the existing office space. The uplift in town centre uses would be 15,760, also well in excess of the existing office floorspace. As such the loss of the office space would be permissible under saved policy 1.4 of the Southwark Plan, and no loss of B class floorspace s106 contribution would be

required. As NSP47 includes education and retail as employment space, there would be no conflict with this draft policy either.

149. Notwithstanding the above, proposal site designation 39P does require 45,000sqm of B class floorspace within the designation area and currently only 2,959sqm has been completed or consented. However, more widely, 19,367sqm of B1 floorspace has been completed or consented in the opportunity area since it was designated in 2004. There is also a resolution to grant planning permission for a further 28,638sqm of B1 floorspace at Skipton House which would bring the total to 50,964 of completed or consented B1 floorspace in the opportunity area, although it appears unlikely this development will go ahead. Based on employment densities this could support around 4,000 jobs, a significant contribution towards the 5,000 new jobs given in the London Plan as the indicative employment capacity for the opportunity area.

Provision of residential units

150. Section 6 of the NPPF sets out the government's approach to the delivery of significant new housing including a plan-led approach based on a sound evidence base. There is a pressing need for housing across London, and policy 3.3 of the London Plan supports the provision of a range of housing types. It sets the borough a minimum target of 27,362 new homes between 2015-2025, and as stated table A1.1 (Annex 1) of the London Plan sets a minimum requirement for 5,000 new homes in the Elephant and Castle Opportunity Area. Strategic policy 5 of the Core Strategy reinforces the London Plan policy, and requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas.
151. There are currently two residential units on the site, one above the Charlie Chaplin public house and one above the newsagents. Concerns have been raised during public consultation that the proposed development would be too focussed on residential use, to the detriment of the provision of other uses including retail and leisure. Concerns have also been raised that planned and consented developments in the opportunity area would already provide in excess of 5,000 new homes, suggesting that the regeneration of the area is not being plan-led.
152. The proposed development would provide 979 residential units in a highly accessible location, and on a brownfield site at the heart of the opportunity area which is a focus for new development. 979 homes equates to 36% of the borough's annual housing target and 20% of the minimum target for the opportunity area, a significant contribution to the borough's housing stock.
153. 5,650 new dwellings have either been constructed or consented in the opportunity area since it was designated. The London Plan sets 5,000 new homes as a minimum number which should be achieved or exceeded, and there is an ongoing need for new housing. There would be an increase in retail and D class floorspace as a result of the proposal, therefore it is not considered that the level of residential proposed would be to the detriment of the delivery of other town centre uses. The proposal would deliver a lively, mixed-use development including a significant quantum of much needed new housing in the heart of Elephant and Castle, including affordable housing. Moreover, the GLA stage 1 report notes that 'The proposal includes an excellent mix of uses for this part of the CAZ – including office, housing, educational and leisure space' (paragraph 23).

Provision of transport infrastructure

154. The proposed development would include the construction of a station box which would become a new ticket hall for the Northern Line. The station is currently served by two lifts and experiences passenger capacity problems as noted in the Elephant and Castle SPD. Improving access to the Northern Line is a key aspiration in both the Core Strategy and the Elephant and Castle SPD, and would have a significant positive impact upon the function and use of the town centre. The Core Strategy vision for the opportunity area advises that the regeneration of the opportunity area will create a highly integrated and efficient public transport hub which will comprise an improved Northern Line station with a new ticket hall and escalators under the shopping centre, enhanced conditions for bus and rail users and an improved interchange between the various modes. It advises that all development will be phased to ensure that funding is available so that the necessary transport capacity and improvements can be delivered in time to accommodate the new residents, businesses and leisure opportunities in the opportunity area. This key objective is reiterated in the Elephant and Castle SPD, and the inclusion of a station box to facilitate a new ticket hall would comply with guidance note SPD1 'Land uses' which requires the development to provide space for an increase in the capacity of the Northern Line ticket hall, as well as policy SPD22 'Transport and movement'. As such this would be acceptable in principle, and is a significant positive aspect of the scheme which is welcomed.

Land use conclusion

155. The land uses within the proposed development would deliver a number of the key development plan objectives for the area. This includes an increase in retail floorspace, with leisure and cultural facilities through the provision of a new shopping centre, and leisure floorspace which is likely to be in the form of a new multi-screen cinema and a cultural venue venue (albeit that there is a net reduction in leisure as discussed above). The SPD vision advises that London South Bank University and the London College of Communications will develop further as important centres of learning, and the new building which is likely to be occupied by the LCC on the east site would help to facilitate this; the potential investment by the college in the heart of the opportunity area is seen as a significant positive aspect of the proposed development and would contribute to the vibrancy of the town centre. A significant quantum of new housing would be delivered which would comply with the London Plan which seeks to deliver a minimum of 5,000 new homes within the opportunity area, and the proposal would facilitate the delivery of a new ticket hall for the Northern Line. Overall it is considered that the mix of uses proposed would comply with the development plan and the SPD vision for the opportunity area (notwithstanding the reduction in leisure uses discussed above), and would help to strengthen the role of Elephant and Castle as a major town centre.
156. It is recognised that there would be a temporary loss of retail, leisure and office space until the east site is completed, which would result in temporary, adverse impacts to local residents. The site is however, in close proximity to shops and services along Walworth Road including East Street Market, and is very close to the new Castle Leisure Centre which provides fitness and leisure opportunities. Construction management plans would need to ensure that people could safely access these facilities during construction, and the equality implications section of this report sets out how affordable retail space could be delivered close to the site which would provide shopping provision prior to the completion of the new shopping centre.

Equality implications

Legal context

157. The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender reassignment, pregnancy and maternity, race, religion, or beliefs and sex and sexual orientation. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
158. This section of the report examines the impact of the proposal on those with protected characteristics and with a particular focus on the Council's legal duties under s.149 of the Equality Act 2010. A range of issues are discussed below. One particular issue is the displacement of existing businesses. The proposed development would require the demolition of all the existing buildings on the site. With the possible exception of arches 6 and 7 Elephant Road, the landlocked nature of the east site and infrastructure constraints mean that it would not be possible for the demolition to be phased in such a way that businesses could continue to operate following demolition and construction work. As such, all of the existing businesses would have to relocate or cease prior to demolition works commencing. This raises a number of issues which are discussed in detail below along with other equality issues.

Available material

159. A number of documents have been submitted with the application which are relevant to equality implications, including the ES, the applicant's Equalities Statement, Addendum, additional information, and a draft Local Business Support and Relocation Strategy. Also of relevance is the Council's own Equality Analysis dated June 2016. This is based upon two surveys. The first was a survey of the existing businesses on all of the land within the east site including the shopping centre, Hannibal House and the market stalls, together with 15 railway arches to the east of the site which it advises form part of the site (only 4 of the arches form part of the application site). The second survey was of visitors to and users of the site, and both surveys were undertaken between 4 January and 9 February 2016. All businesses within the survey area were contacted to arrange interviews, and 86 businesses took part, including from Hannibal House, market stall holders and the railway arches. For visitors to and users of the site, an on-street survey was undertaken and 502 members of the public who were stopped at random participated. The survey found that 93% of business owners who responded to the survey were from Black, Asian and Minority Ethnicities (BAME). Within the shopping centre approximately 70% of the businesses are national chains and 30% are independents. All of the businesses within the site but outside the shopping centre are independents, and there is a mix of charities and short-term office space in Hannibal House. *Given that the surveys were carried out some time ago, AECOM has reviewed the material again in light of the fact that 14 businesses have*

subsequently left the site, and five have opened at the site as short term lets. AECOM have advised that the main equalities issues originally identified remain unaffected and valid.

160. *An objection has been received raising concerns that the equality analysis undertaken by AECOM considers impacts arising from a potential Compulsory Purchase Order (CPO), and not from the granting of a planning permission. Whilst this is noted, the impacts of granting permission for the proposal are likely to be the same as if a CPO were granted to allow the permission to be implemented, and the potential impacts have been outlined below. Different objections comment that the equality implications of a CPO have not been considered. This report seeks to set out the potential equality implications arising from a decision to grant planning permission, which Members must taken into consideration when making their decision. In the event that permission is granted, it is not yet known whether a CPO would be required. If the Council were asked to use its CPO powers to implement any permission granted, it would have to have regard to its duties under the Equality Act in taking that decision.*
161. A number of consultation responses raise equality implications as concerns, and these too have been taken into account. The consultation responses raise concerns that no relocation / trader support strategy was submitted with the planning application (a draft strategy has subsequently been submitted), and that the applicant's Equalities Statement is insufficient and does not recommend any mitigation measures, inadequacies regarding a proposed database of relocation opportunities, and lack of clarity regarding which businesses would be eligible for support. It is noted that Southwark Law Centre and the Elephant Amenity Network consider that the Council's Equality Analysis is not sufficient because it only includes the shopping centre, but that is not the case. As set out above it included all businesses within the east site red line including Hannibal House and the market stalls, and actually included a number of railway arches which do not fall within the red line. Officers are therefore satisfied that the scope of the analysis is acceptable. These groups have also raised concerns that a 9 May 2017 cabinet report entitled 'Elephant and Castle Shopping Centre Equalities Analysis and Mitigation Projects' incorrectly identifies the number of businesses in the shopping centre as 86, and does not include other parts of the site. There is indeed an error in the Cabinet report. There were 86 respondents to the equality survey (not 86 tenants), and this included six from Hannibal House, 18 from market stall holders and 9 from tenants of the railway arches.

Affected groups

162. Impacts upon the following groups sharing protected characteristics have been identified (NB: this does not include impacts regarding loss of the bingo hall, which is considered separately below):
- **Age** (older business owners who may find it difficult to relocate and impacts upon young people arising from the displacement of the Young Stroke Survivors charity)
 - **Race** (impact upon existing businesses, their employees and customers.
163. *Concerns have been raised during public consultation that the impact upon women has not been considered, given that gender is a protected characteristic. Whilst this is noted, the survey of business owners showed a gender split of 67.5% men and 32.5% women. Of the Latin businesses, 40% are owned by women compared with 60% men. As such the proposal would not result in a differential or disproportionate effect on*

either sex of the business owners. All independent business owners would be eligible for the relocation support outlined below.

Race

164. There is a high proportion of business owners, together with their employees and customers from Black, Asian and Minority Ethnic (BAME) backgrounds; people of Latin American, Black African, Black Caribbean and Asian origin would be most vulnerable to the effects of the loss of their existing business premises.

Impacts on existing shops and businesses

165. There are a range of leases and lease statuses for the traders within the red line planning application boundary. This includes 25 businesses with longer term leases and 13 businesses with short term leases operating from retail units in the shopping centre, 7 licenced barrow holders within the shopping centre, up to 60 market traders, and approximately 10 businesses operating from the Network Rail arches. In Hannibal House there are 6 businesses on longer term leases and 3 businesses on short term leases. The businesses within the shopping centre which are on short term leases are those which have entered the centre since its acquisition by the current owner, in the knowledge that the intention was to redevelop the site.
166. Adverse effects on the existing businesses could include temporary effects during relocation, and the effects of changes to clustering of businesses offering services to a common customer set.
167. The council's Equality Analysis advises that many respondents were unsure about the future affordability of business units which would be provided in the proposed development, and felt that they had received inadequate information about it including when it would start and how long it would take. The proposed development could impinge negatively on the ability of BAME business owners to run their business successfully for reasons including commercial rents in the proposed development being higher than existing rents, less suitable units for the types of businesses which they operate (especially market stalls), and they may be less engaged in the redevelopment process.
168. A business survey undertaken confirms that there is a strong desire among business owners across all ethnic groups to continue operating their businesses following the redevelopment of the shopping centre. The analysis notes that confidence about their ability to return to the new shopping centre is low, and the analysis assumes that with the exception of LCC, it is likely that the majority of existing businesses on the site would relocate elsewhere.

Impacts upon market stall operators

169. Market stall operators may experience temporary or permanent closure or disruption to business operations, financial or other barriers to re-opening at the new development or in the wider area.

Impacts on employees of existing businesses

170. Existing employees may experience temporary or permanent loss of income and / or employment until relocated, and/or where their employer closes/downsizes/relocates elsewhere.

Impacts on goods and services

171. The shopping centre provides a range of culturally diverse shops that provide convenience goods and services and acts as a hub to cater to a range of BAME groups, as well as the general public. The proposed development would result in the displacement of BAME owned businesses which comprise the majority of SMEs on the site, and which provide goods or services which serve the needs of people from a shared ethnic background. The council's Equality Analysis identifies potential concerns about how businesses would retain their existing customer base if they were required to move out of Elephant and Castle, particularly those which have been at the site for a long time. The analysis advises that existing BAME groups currently feel well catered for in terms of access to culturally specific goods and services within the shopping centre, and that the proposed development would impact upon this. It does note however, that the local area provides a diverse mix of shops that provide a wide range of goods and services, and that the site is within easy walking distance of Walworth Road where similar services can be found.
172. *Concerns have been raised following public consultation on the application that Walworth Road does not provide equivalent services which cater for the specific needs of the Latin American community and that there are only two Latin businesses on Walworth Road, including a café which has introduced European-style food to its menu to meet demand in that location. Whilst this is noted, the site is close to Tiendas del Sur which is a retail arcade occupied by Latin American businesses, and if planning permission is granted, 10% affordable retail space would be provided, with priority to existing traders within the red line – this is considered further below. The s106 would also include a requirement for the businesses to cluster, with the most likely locations being fronting Walworth Road on the east site and Pastor Street on the west site.*

Impacts on customers of existing shops / businesses owing to the loss of these facilities

173. Negative effects could include changes to access to culturally-specific goods and services, associated sense of belonging and cultural connections. In terms of specialist provision for customers, the equality analysis again notes that similar services and accommodation are available along Walworth Road.

Impacts on users of particular facilities, including the Coronet Theatre, passport interview office, Language Centre, the London School of Management and charities in Hannibal House (bingo and bowling are considered separately below)

174. The council's Equality Analysis advises that users of these facilities could be adversely impacted as a result of the proposed development, particularly where there are limited comparable alternatives within a reasonable travel distance. There are two charities on the east site which provide help to those suffering from the effects of crime and young people affected by strokes. The analysis advises that closure/relocation of these charities may give rise to health inequalities to those with protected characteristics, for instance BAME groups or young people. Where usage patterns reflect patterns in protected characteristics this may give rise to equality effects which may include physical and mental health inequalities.
175. The equality analysis advises that there are 61 music and nightclub venues within a mile of the Coronet, and consequently concludes that there is a reasonable provision

of these facilities in the locality. The nearest government passport office is at Victoria, some distance from the site. There are 9 language schools which offer English and other language tuition within a mile of the existing facility, and the UAL international language centre would likely be located in the new education building on the site.

Proposed mitigation

176. As stated, the applicant has submitted a Draft Local Business Support and Relocation Strategy, together with an addendum to the Equalities Statement and additional information which sets out how the measures in the draft strategy would help to secure positive and mitigate against negative equality impacts. The applicant's mitigation measures are largely based on a 9th May 2017 cabinet report entitled 'Elephant and Castle Shopping Centre Equalities Analysis and Mitigation Projects'. Concerns have been raised following public consultation on the application that traders have not been involved in the preparation of the draft Local Business Support and Relocation Strategy. Whilst this is noted, re-consultation was undertaken on the draft document once it was received, and a number of changes made to it in response to feedback received. As set out below, this includes increasing funding to provide independent business support all independent businesses within the red line, confirming contribution amounts for a relocation fund, and increasing on-site affordable retail space.
177. Concerns have been raised following public consultation that the applicant's draft Local Business Support and Relocation Strategy does not comply with policy P38 in the draft NSP or guidance in Appendix 1 of the draft Old Kent Road Area Action Plan. However, both are draft policies and can only be attributed limited weight at present, and Elephant and Castle has its own opportunity area planning framework / SPD. Concerns have also been raised that it does not refer to the Elephant and Castle Traders' Charter.
178. At its meeting on 30 January 2007 the council's Executive received a report concerning business continuity at the centre and affirmed the council's willingness to negotiate with other parties to develop a "business continuity charter". The intended purpose of the proposed charter was to guide the relevant stakeholders on the regeneration of the centre. Not long after that Executive recommendation the financial crash of 2007 occurred that resulted in a severe and prolonged down turn in the property market. Against this background the proposed charter was not developed any further by the parties and ten years later things have moved on:
 - There is a different shopping centre owner that was not party to 2007 discussions;
 - The centre is to be redeveloped independently to the former Heygate Estate; in 2007 a single regeneration was envisaged;
 - The nature of the regeneration is very different it now includes a new Northern Line station and the University of Arts London site; and
 - Other major developments in the immediate area have now been completed.
179. It is therefore considered appropriate to adopt a fresh approach to the impact that planning application would have on the existing traders. The proposed mitigation measures do however, draw on some of the earlier proposals as they include an independent advisor, affordable retail units and a database of available premises as set out below.
180. As stated, age and race have been identified as potential characteristics which could

experience adverse equality impacts. The same support would be available to help people within both of these groups, therefore the proposed mitigation set out below covers both of these protected characteristics.

Appointment of an independent business advisor

181. The applicant's draft local business support and relocation strategy provides details of the appointment of Tree Shepherd, an independent business advisor. This responds directly to a recommendation in the council's Equality Analysis that an independent panel should be appointed to provide advice on matters relating to relocation and business support. It advises that existing shopping centre tenants should be involved in the selection and appointment of panel members.
182. Tree Shepherd has been appointed by and reports to the council, but is funded by the applicant. The Tree Shepherd appointment was initially on the basis that they would provide support to 25 businesses, and a number of responses following the re-consultation exercise queried the basis for this and why all businesses could not be included.
183. The 25 businesses is based on those businesses currently operating in the shopping centre which have fewer than three units, and which were operating there before it was purchased by the applicant in 2013. The rationale for this was that those who moved into the shopping centre after this time did so in the knowledge that it would be demolished, and were only granted short leases. However, this approach has subsequently been amended. The applicant has agreed to provide additional funding so that Tree Shepherd support would be available to all independent businesses within the red line, including those within the shopping centre, Hannibal House, the railway arches, the market stalls and kiosks. Tree Shepherd has been based at unit 231 of the shopping centre since August last year and the scope of services which it provides is as follows.

Phase 1 (pre-implementation)

184.
 - To produce information packs (in English and Spanish) outlining the support on offer;
 - To publicise and hold a series of interactive information workshops;
 - To make introductory door-to-door visits to businesses
 - To match businesses with advisors for one-to-one confidential advice sessions;
 - To conduct an initial business health check and needs analysis with each trader;
 - To manage a database of commercial property available in the local area and publicise this to traders;
 - To build trust and create well-attended events that act as a forum for the Shopping Centre Management Team and tenants to work together;
 - To staff unit 231 Monday to Friday, 9am to 5pm to use as a base for walkabouts, to give traders the opportunity to drop in for informal visits, holding confidential one-to-one advice sessions, and running small group business workshops.

Phase 2 (post-implementation)

185.
 - To continue with phase 1 activities;
 - To establish and manage a panel of specialist professional advisors including solicitors, surveyors and accountants whose services are available to tenants;
 - To assist traders to review and assess alternative business models and / or

- premises options;
- To support the council in administering the relocation fund.

Throughout the project

- 186.
- Clear communications;
 - Continuing needs analysis and personalised tailored support.
187. The Tree Shepherd appointment would support all existing independent businesses within the red line planning application boundary, which includes older business owners, business owners from BAME backgrounds, and charities operating from Hannibal House. Offering support to these businesses would in turn help to support their employees. Although the traders were not directly involved in the appointment which has been raised as a concern by Southwark Law Centre and Elephant Amenity Network, Tree Shepherd project staff were introduced to traders individually prior to their appointment, as part of the selection process. *As an amendment to the proposal the applicant proposes to set up a trader panel to oversee the delivery of the relocation strategy. This is described in the applicant's updated Statement of Community Involvement and is proposed as comprising two ward Councillors, two representatives from the traders, Latin Elephant and representatives from the developer.*
188. It is difficult to be precise as to the exact number of BAME owned businesses which would be affected by the proposed development, because if permission is granted, existing businesses could cease or relocate of their own accord prior to closure of the shopping centre. Tree Shepherd are in place now and can support the businesses through this process, and they would remain in place for one year after the closure of the shopping centre to offer ongoing support. *It is noted that the railway arch tenants may still be operating once the shopping centre has closed and the Tree Shepherd role come to an end. The applicant has therefore agreed that if they are still in place, to provide them with details of who to contact for future retail vacancies. It is noted that these businesses would be able to access the database at the same time as everybody else in any event.*
189. Concerns have been raised that information given to Tree Shepherd by existing businesses may not be confidential because they are funded by the applicant. However, as set out above in relation to the services which Tree Shepherd provides, all information is treated as confidential.

Database of relocation opportunities

190. The council's Equality Analysis recommends that the developer prepares a relocation strategy, together with a database of relocation opportunities within the area, with the objective of enabling businesses which wish to do so to relocate to alternative premises in Elephant and Castle. As stated a draft Local Business Support and Relocation Strategy has been submitted. It is not yet known when the shopping centre would close, and it is recommended that the strategy be implemented at least 6 months prior to its closure. The s106 agreement or conditions should obligate the developer to notify the council and traders of the closure of the shopping centre at least 6 months in advance.
191. The draft strategy details a proposed database of relocation opportunities which would be set up and maintained by the developer and would be available to businesses via Tree Shepherd.

192. Details would include vacant retail units in the opportunity area, affordable retail units being delivered through other development sites, and market stall opportunities including in the new market square to the east of the site and in East Street Market. The database would differentiate between affordable and market retail units, and would be available to all existing businesses within the red line including shopping centre traders, kiosks holders and market stall holders within the red line, including the charities and businesses in Hannibal House.
193. The database would detail the eligibility criteria for affordable retail coming forward as part of other developments, as set out in their respective s106 agreements, and Tree Shepherd could provide or arrange for support for those who do not speak English as their first language. The council would seek to use its role under the s106 agreement to coordinate the marketing and selection of tenants for the affordable retail units on nearby developments with the relocation of businesses from the site. *The database would be available 6 months prior to demolition of the shopping centre, until one year after its demolition. Again, the railway arch tenants would be notified of who to contact for retail vacancies in the event that they are still operating from the arches a year after demolition of the shopping centre and this would be secured through the s106 agreement.*
194. Concerns have been raised during public consultation on the application that the database would only give a broad indication of the area where vacant units would be identified, and ignores the desire of traders to remain close to the current location and clustered. Whilst this is noted, the council has a role in agreeing the size and location of affordable retail units coming forward on the redeveloped Heygate Estate, because the s106 agreement requires an affordable retail unit strategy to be submitted for approval. It is expected that the affordable units available to relocating traders will be located on a single street at Elephant Park. In addition, the completed affordable units nearby at Elephant One are clustered. The council has formulated plans to deliver its own affordable workspace near to the site which could enable clustering to take place, and this is considered further below. The council has no control over private retail units coming forward in the opportunity area.

Provision of on-site affordable retail

195. As stated in the land use section of this report, 10% on-site affordable retail space would be provided in accordance with the Elephant and Castle SPD. This would equate to between 1,823.4 – 2,109.4sqm, depending on how flexible space on the west site were ultimately occupied. The provision of this space on-site would enable businesses to cluster, which is something which has been raised during public consultation. *The applicant's revised offer advises of the intention to develop a vision for Pastor Street on the west site, to provide a cluster of affordable retail and commercial spaces as part of the formal affordable retail offer, and this would be secured through the s106 agreement.*
196. At present 6,512sqm of floorspace within the red line is occupied by independent businesses. Of this, 2,507sqm is office space occupied by tenants of Hannibal House. The remaining 4,005sqm is occupied by businesses in retail premises, which would be eligible for affordable retail space under the SPD. Although the Elephant and Castle SPD permits affordable retail space to be offered to eligible businesses within the opportunity area which have been displaced by development, it is recommended that in the first instance the on-site provision be offered to eligible businesses within the planning application red line. An affordable retail strategy should be secured through the s106 agreement and Tree Shepherd would be able to assist traders to

ensure that those sharing in protected characteristics are able to fully engage with the opportunities available. Details of other affordable retail coming forward in the opportunity area is set out below.

Relocation fund

197. The applicant has also offered a financial contribution to provide a relocation fund for affected traders. Officers requested £634,700 for the fund, related to the number and type of businesses within the red line, and this amount has been agreed by the applicant.
198. The financial contribution for the relocation fund has been calculated taking into account the different types of business and leases inside the red-line including market stalls, kiosks and businesses in Hannibal House, and in consultation with Tree Shepherd and their experience in Peckham and other locations. Officers estimated reasonable costs under the categories of professional advice, capital costs including towards fit-out and signage, a per day cost reflecting loss of time to traders when searching for locations, relocating, restocking and other reasonable costs. This came to £634,700 which the developer has agreed to pay, and which would be administered by the council independently of the developer. The s106 agreement would obligate the developer to notify the council 6 months in advance of the anticipated date of the demolition of the shopping centre, and to pay the contribution at the time of the notification. The s106 agreement would also stipulate that demolition of the shopping centre could not commence until at least 6 months following the date that the contribution was paid. This is to ensure that the fund would be in place sufficiently far in advance of demolition to assist the affected traders.
199. It should be noted that the above cost assumptions, whilst required in order to calculate a contribution amount, do not indicate a flat rate for each business, and the council would work with each business on a case-by-case basis when administering the fund. Traders would be consulted during the s106 negotiations, when the specifics of how the fund would be administered would be agreed. This arrangement would seek to account for the range of options available to the traders, while also acknowledging that the fund would be finite, and there must be agreement on how much an individual business could claim. It should also be noted that if planning permission is granted, the timetable for closure cannot be accurately predicted. However, the council would work proactively with Tree Shepherd to keep traders informed of the timetable and future actions that would affect them. Officers would work with traders, Tree Shepherd and Latin Elephant to design a fair system for relocation to best avoid any dispute. However the council would remain the final arbiter for the fund.
200. The applicant has also agreed that it could be administered without any predetermined restrictions on length of occupancy or statutory compensation, and that it would be available to all businesses within the red line, not just the shopping centre, including Hannibal House, the market stalls and kiosks, and the businesses within the railway arches. Allocation of the funds as to which businesses should receive funding and how much would be overseen by the council in conjunction with Tree Shepherd.
201. Factors which could inform how funds are allocated could include how long businesses have been trading at the site and the viability and needs of the business, although the council would consult with traders further on the principles and processes for allocating the fund which would then feed into the s106 agreement. The fund could be put towards the cost of professional services such as solicitors and surveyors,

advertising to ensure that customers know where businesses are relocating to, capital expenses such as shop fronts or fit out, and compensation for loss of trade during relocation.

Affordable workspace (use class B1)

202. As set out in the land use section of the report, the applicant proposes to deliver up to 10% of any B1 floorspace coming forward on the west site as affordable, although it is noted that the quantum could be very limited and the long timescale for delivery is such that the businesses and charities in Hannibal House would probably have relocated beforehand in any event. Notwithstanding this, it is proposed that this space be available in the first instance to small and medium-sized independent businesses and charities displaced from Hannibal House, followed by new business start-ups and businesses which employ less than 10 full-time staff. It is again noted that the charities would have access to Tree Shepherd support and the database of relocation opportunities.

Other equality measures

203. Concerns have been raised during public consultation that the equality analysis does not consider the impact of covered space within the shopping centre on people with disabilities. The Design and Access Statement contains a section on 'Access and Inclusivity' which sets out measures which would be incorporated into the development to assist people with mobility impairments, visual impairments, deaf people, older people and small children. Measures which would be incorporated include level access to buildings with non-slip paving suitable for people with visual impairments, escalators and lifts within the shopping centre and lifts for the residential units, good lighting, seating and resting places, contrasting manifestations on glazing to the proposed education building, wheelchair accessible and adaptable residential units and space for parking mobility scooters. All of the car parking on the west site would be wheelchair accessible.
204. *Concerns have been raised that the proposed measures set out above to assist existing traders and their customers would not help businesses whose leases would expire before the relocation strategy would be implemented. There are concerns that businesses whose leases would expire before any resolution to grant planning permission or before any permission were granted would miss out on relocation support, and that this raises equalities issues which should be considered.*
205. *This concern is noted, but until and unless a planning permission is actually granted and then implemented, it is not possible to secure any mitigation measures, including the relocation strategy. Making a resolution to grant planning permission is not the same as actually granting planning permission, and if there is a resolution to grant, the application would have to be referred to the GLA, the Secretary of State would have to be notified, and a s106 agreement would have to be completed, before the planning permission is capable of being implemented.*
206. *Planning obligations including financial contributions are generally secured upon the implementation of a permission or, in some circumstances, slightly later. But if a permission is not implemented, it would not be compliant with the requirements as set out in regulation 122, Community Infrastructure regulations to require the mitigation measures. Therefore whilst there may be equalities impacts owing to businesses' leases expiring from the date that the resolution to grant is made, these impacts would be the same if there were no resolution to grant due to the natural expiry of the leases*

in accordance with the landlord and tenant lease arrangements. Moreover the council is not the landlord for the shopping centre and has no other means by which to prevent this from happening.

Positive equality impacts

New employment and training opportunities

207. As stated the proposed development would create 1,230 construction jobs over the 10 year build programme, and an increase of between 395 and 572 jobs in the completed development. Clauses within the s106 agreement should include measures to ensure that those sharing protected characteristics are able to fully benefit from these.

Provision of new housing including affordable housing

208. Particular groups with significant housing need which are strongly represented in the local population include BAME groups, women, families with children and young people. These groups could stand to benefit from the proposed housing, and as noted in the affordable housing section of this report the affordable housing would include social rented units.

Improved and more accessible public realm, streetscape and transport

209. This could particularly benefit disabled people, with physical measures such as level surfaces, resting places and high quality lighting incorporated into the design. There would be improved access to the Northern Line and overground station, and The Court would create a place for social interaction. There would be improved connections to the wider area which would benefit older people, disabled people, young people, women and children.

New shopping and other facilities

210. The majority of people living in the opportunity area are likely to benefit from the new shopping and other facilities.

Community cohesion

211. The analysis advises that delivery of improved open space including seating, shelter from the roads and access to amenities is likely to increase community cohesion and foster a sense of place. It notes that those sharing protected characteristics may face barriers in experiencing these benefits, such as a loss of community cohesion where a cluster of services they use is dispersed or lost. Older people who use the bingo hall may experience a loss of social inclusion if this facility were no longer available for them to visit regularly (see below). *In order to address this, measures in the s106 agreement would seek to cluster the affordable retail units and a bingo operator would be offered first refusal of a proportion of the leisure floorspace on commercial terms.*

Educational opportunities

212. The proposed development would deliver a new education building which is likely to be occupied by LCC and which may be particularly beneficial for young people and BAME groups by providing improved educational facilities in the heart of the opportunity area.

Creative hub benefits of LCC

213. Plans are being developed for the LCC archive collections to be made available to the public. These benefits would likely be widely shared in the Southwark/London area and may provide benefits to groups with protected characteristics, including in relation to cultural identity.

Night time economy

214. The Equality Analysis advises that an increased night time economy may particularly benefit young people through employment and leisure opportunities, although it could decrease feelings of safety for older residents. Whilst this is noted, the proposal would offer a range of day and night time uses and natural surveillance of the area. Improved routes and good lighting would be provided through and on the site.

Sharing of benefits

215. The council's equality analysis advises that throughout the development process community engagement should be carried out and equality effects could be experienced. For example, local young people and BAME groups may face barriers to participating and be under represented, and older people could be over represented. *In light of this a condition is recommended requiring a scheme for ongoing community engagement to be submitted for approval. This should cover the 6 months prior to the closure of the shopping centre and should include a requirement for traders to be notified at least 6 months prior to its closure.*

Affordable retail in the wider opportunity area

216. Queries have been raised during public consultation as to whether any of the new market square to the east of the shopping centre would be available to existing market stall holders in The Moat. No space within the market square has been specifically allocated for existing market stall holders, and the new market square does not fall within the application red line boundary. Stall holders would be able to apply to the operator for a pitch within the new square, and the operator would be licensed by the council's Markets Team; details would be included in the database of relocation opportunities. *New pitches have been created in East Street Market which existing market stall holders could also apply for and they would be eligible for assistance from the relocation fund.*
217. Also of note is affordable retail space coming forward on other sites within the opportunity area. The 10% requirement in the Elephant and Castle SPD relates to all applications which would provide 1,000sqm or more of new retail space, and affordable retail has been secured on the following other sites, which are within approximately 220m of the existing shopping centre equating to around a four minute walk, and close to significant numbers of new residents.

Elephant One

218. This development contains 411sqm of affordable space in the form of seven retail units and one restaurant unit. They are located at ground floor level on the eastern side of this building, to the north of the new market square and in very close proximity to the site. The restaurant unit is on the podium level facing the new market square.
219. The s106 agreement requires these units to be made available to eligible businesses

in the shopping centre in the first instance, although only to businesses which began trading there before 19 February 2004. These units are largely complete on site, and an application is pending to include shopfronts to the units and to remove the 2004 restriction (reference: 17/AP/3619).

Former Heygate Estate (Elephant Park)

220. There would be approximately 1,351sqm (GIA) of affordable retail on the redeveloped Heygate Estate which would be available in accordance with the SPD eligibility criteria. It is not yet known when the shopping centre would close, but it is expected that approximately 500sqm of the affordable retail on the former Heygate Estate would be available by 2019.
221. The combined amount of affordable retail coming forward from both of these two developments will be 1,762sqm. Between 1,823.4 and 2,104.4sqm would come forward on the application site taking the total to up to 3,866.4, only marginally short (138.6sqm) of the 4,005sqm of space currently occupied by independent retailers on the east site. When calculating the amount of floorspace occupied by independent traders, this includes the shopping centre, railway arches and kiosks. It is understood through the work being carried out by Tree Shepherd that some of the businesses would be able to trade from smaller premises than they currently occupy.
222. There is a resolution to grant permission to redevelop Skipton House which would include 153sqm of affordable retail space, but at the time of writing it appears unlikely that the s106 agreement for this development will be signed so it has not been included in the affordable retail calculations. 81sqm of affordable retail space has also been provided in Strata and Dashwood Studios but this has not been included either because it has already been let to independent businesses operators from the shopping centre.

Council-own projects

223. The council is currently considering a project to deliver its own affordable retail space, at disused garages beneath Perronet House which is within 120m of the site, close to the existing customer base. A planning application has been submitted for Perronet House and which appears as item 6.3 on the committee agenda (reference: 17-AP-4651). In the first instance the space would only be available to existing independent businesses within the planning application red line boundary, with priority to those businesses which have been trading at the site the longest. This project has the potential to deliver approximately 550 sqm of retail space and could be completed by the end of 2019. Members should give no weight to this proposal at present however, as it does not have planning permission.

Affordable retail summary table

	Consented affordable retail	
Location	Affordable retail (GIA, sqm)	Timescales
Elephant One	411sqm	Available now
Elephant Park	1,351sqm	500sqm by 2019, remainder by 2021
	Proposed by current planning application	
East site	1,713.2 sqm	Approx. 2024

West site	110-391 sqm	Approx. 2029
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Equality implications arising from the loss of the bingo hall

224. The council's equality analysis notes that older people who use the existing bingo hall on the east site may experience a loss of social inclusion if this facility is no longer available for them to visit regularly. In light of this a separate survey has been undertaken in relation to the bingo hall, the findings of which are set out in a report 'Elephant and Castle Shopping Centre Redevelopment – Bingo Hall Survey Results: Final Report (February 2017). The survey found that this facility is predominantly used by older people, with 91% being over 45 and 48% being over 65 years of age. In terms of ethnicity, 62% of the user group identified themselves as being of Black / African / Caribbean / decent. In terms of frequency of visits, 94% of those interviewed visit at least once a week and 36% visit five days a week or more and 37% advised that they attend the bingo hall to socialise / get out of the house. 93% of those interviewed only use the bingo hall at the site – they do not visit other bingo halls. The report simply identifies which groups may be affected; it does not go as far as recommending any mitigation measures.
225. The nearest bingo hall is at Surrey Quays Leisure Park, approximately 2.4 miles from the site, although it is not known whether this would be re-provided if the proposed redevelopment of Canada Water goes ahead. There are others further afield, and they are all approximately 25-30 minutes travel time from the site via public transport. Officers consider that there are no planning policy grounds for requiring the existing bingo hall to be replaced (although Members must consider the equality implications of it not being replaced), and the overall quantum of D class floorspace on the site would increase.
226. *However, as stated earlier, the applicant has agreed to give the first right of refusal to a bingo operator, on commercial terms, to lease approximately 1,850sqm of the proposed leisure floorspace within the development. The applicant has advised that approximately 959 seats could be provided within this amount of space, across tables of two and four which is similar to the existing arrangement. This amendment is welcomed, and would be secured through the s106 agreement together with a requirement for details of a marketing strategy to be agreed with the council. Members must note, however, that whether a bingo hall is ultimately delivered on the site depends on whether an operator comes forward.*
227. The existing bingo hall operator could access Tree Shepherd support and the database of relocation opportunities, although it is noted that this would only identify retail premises. The applicant has advised that since 2014 17 alternative locations have been suggested to the bingo operator (no details of which have been provided), none of which have been accepted. It is recommended that a condition requiring a community use agreement for the education and leisure floorspace within the development be submitted for approval. This could include a requirement to hold events specifically for elderly people or ethnic minorities to attend and whilst not directly comparable with the bingo, this could include for example, a series of film screenings targeted at these groups, and should include measures to facilitate social interaction. The applicant has been asked to agree to a minimum number of hours but has advised that for viability and commercial reasons is unable to do so at the present time. The condition should therefore require details of the numbers of hours, frequency and types of events to be submitted for approval once operators for these facilities have been secured. It is not currently known what it may ultimately be possible to secure therefore Members must give this appropriate weight.

228. *The commitment to offer first refusal of some of the leisure space to a bingo operator is considered to be a significant improvement in terms of helping to mitigate potential equality impacts. However, as it would be dependent on an operator coming forward.* Members must be aware that there could still be adverse impacts upon people from BAME backgrounds and older people. This would include temporary impacts during construction when there would be no replacement leisure facilities available, although the s106 agreement should include a requirement for an information strategy to be submitted for approval. This should include details of how and when people would be informed of the date that the bingo hall would close, details of alternative bingo facilities, and details of how these can be accessed by public transport from the site.
229. Members must weigh the above in the balance with the other benefits and dis-benefits arising from the proposal. This is discussed further in the overall assessment section below.

Loss of the bowling alley

230. An equality analysis has also been undertaken in relation to the existing bowling alley, the findings of which are set out in a report 'Elephant and Castle Shopping Centre Redevelopment Equality Analysis – Bowling Alley Survey Results: Final Report' dated 17 August 2017. It identifies that the bowling alley caters for a mostly local clientele (89%), it is used primarily by people of traditional working age, and whilst the largest single user group is White British, the facility is predominantly used by people from ethnic minorities (60%). Further advice has been sought from AECOM which undertook the equality analysis and whilst there would be an equality impact arising from the loss of the bowling alley, it is not considered to be significant. When compared to the bingo, the bowling alley is used by less people less frequently, and users of the bowling alley are more likely to visit other bowling alleys too. It is noted that there is currently another bowling alley at Surrey Quays Leisure Park, and new leisure floorspace would be included in the development which could be used for bowling if an operator came forward.

Affordable housing

231. Concerns have been raised by Southwark Law Centre and the Elephant Amenity Network that the type of affordable housing proposed, by excluding people who are economically inactive, would have adverse equality impacts as this could disproportionately impact, for example, upon people with disabilities or who are older. *The updated affordable housing offer now includes traditional social rented accommodation which would be owned and managed by the council or a Registered Provider, as opposed to social rent 'equivalent' units which would have been owned by the developer. Nominations would be from the council's housing list in the usual way which does not exclude economically inactive people.* The other affordable housing units would be allocated in line with an intermediate housing list which the council is currently developing. As part of this process an equality impact assessment of the intermediate housing list proposals would be undertaken, to ensure that it would not disproportionately impact upon those sharing protected characteristics.

Loss of music and restaurant facilities

232. *Concerns have been raised regarding the potential loss of La Bodeguita which is in the shopping centre, and Distriandina which is at railway arch 6 on Elephant Road. Both are popular Latin American venues which operate as cafes / restaurants during the*

day and music / club venues in the evening.

233. *Both of these businesses are independent and, as such, would be able to access support via the measures outlined above. This includes Tree Shepherd advice, the database of relocation opportunities, affordable retail space within the site and wider opportunity area including affordable restaurant space in Elephant One and financial support via the relocation fund. Although not providing exactly the same services, there are other Latin American restaurants nearby including La Cabana del Sur on New Kent Road, and Tito's Restaurant / La Pollera Colora which is further afield in London Bridge which, as well as a restaurant, hosts music and dance nights. Members must weigh this in the balance with the other benefits and dis-benefits arising from the proposal.*

Overall Assessment of Equality Implications

234. The proposed development would undoubtedly result in a significant change to the site. The public sector equality duty does not prevent change, but it is important that the council consider the acceptability of the change with a careful eye on the equality implications of that change given its duty under s.149 of the Equality Act 2010. The council's duty is to have due regard to the objectives identified above when making its decision. In the present context, this means focussing carefully on how the proposed change would affect those with protected characteristics, and ensuring that their interests are protected and equality objectives promoted as far as possible.
235. It is not proposed that there would be an automatic right of return for existing businesses operating at the site, and this has been raised as a concern in public consultation responses. As set out in the land use section of this report there is a need to strengthen the role of Elephant and Castle as a major town centre, and to attract national, comparison retailers to address comparison spend 'leakage' to other boroughs and allowing all existing traders an automatic right to return could potentially undermine this. Guidance note SPD1 in the Elephant and Castle SPD therefore shares the requirement to provide affordable retail across all developments where 1,000sqm or more of new retail would be provided. Moreover, given the projected build period, it is likely that some businesses will either cease trading on or before closure of the shopping centre, or relocate to other parts of the opportunity area, the borough, or beyond.
236. There is clearly a potential for equality impacts to arise in relation to age and race, but it is considered that the mitigation proposed would be sufficient and reasonable. All existing independent businesses would be able to access Tree Shepherd support and the database of relocation opportunities. They would also be eligible to apply for financial support through the relocation fund. There would be 10% on-site affordable retail which would only be offered to existing independent businesses within the red line in the first instance; this would go further than the SPD guidance which would allow it to be offered opportunity area wide.

Up to 10% affordable workspace (B class) is also proposed which could assist existing charities operating from the east site, and this too would be available to existing independent businesses and charities in the red line in the first instance. *Concerns have been raised during public consultation that no B class floorspace may come forward and that even if it does it would not be sufficient to accommodate the existing charities which presents an equalities issue because the charities may support people sharing protected characteristics. Whilst this is noted, the charities in Hannibal House would be able to access the relocation fund and database of relocation opportunities, so*

there would be other support available to them should they require it.

237. Overall it is considered that these measures would go some way to mitigating potential equality impacts, but given that some businesses may cease trading before the shopping centre closes or decide to relocate outside the opportunity area or borough, it is not possible to be precise regarding the potential impacts. If planning permission is granted, it is recommended that the measures outlined above be secured through the s106 agreement. The Southwark Law Centre and Elephant Amenity Network have commented that Members should make the final decision on any forthcoming s106 agreement rather than delegating this to officers. Whilst this is noted, this report details the matters to be secured in the 106 agreement and anything additional that the committee consider necessary can be identified in sufficient detail within any resolution. The detailed drafting will be agreed in the normal manner reflecting the committee's direction.
238. Southwark Law Centre and the Elephant Amenity Network have raised concerns that not all of the measures recommended in the council's Equality Analysis would be implemented. In addition to the measures outlined above and as relevant to the planning application, the Equality Analysis also recommends the preparation of a transition strategy to ensure that the relocation of existing leaseholder businesses would not negatively impact on the vibrancy and safety of the centre, ongoing equality and diversity monitoring including during construction, and the promotion of diverse ownership of businesses at future retail at the site. Tree Shepherd is currently working with the traders and shopping centre management on measures to increase footfall, *and the council requires the developer to undertake equalities monitoring when discharging employment obligations in s106 agreements. In addition to the developer, Tree Shepherd would be able to disseminate information on timescales etc. if permission is granted and implemented and the s106 agreement would require the developer to notify the council 6 months before the closure of the shopping centre. A condition requiring the same notice for traders, together with an ongoing community engagement strategy, is included in the draft recommendation.*
239. The Equality Analysis also advises that measures should be taken to ensure that those sharing protected characteristics can share in the benefits which would arise from the proposed development. These benefits include construction jobs, jobs within the completed development, and the provision of on-site affordable retail. The s106 agreement would contain clauses to secure construction and completed development jobs for unemployed borough residents, and it is recommended that it includes a requirement to consider whether any specific measures are required to ensure that those sharing protected characteristics can fully engage with these opportunities.
240. There are also specific adverse impacts from the loss of the Bingo hall which have been considered in detail above.
241. Based on the above assessments, officers consider that the proposal would safeguard and promote the interests of those with protected characteristics and promote the objectives protected by s.149 of the Equality Act as far as is reasonably possible given that a major regenerative project will inevitably create change to the existing situation.
242. Officers are satisfied that equality implications have been carefully considered in the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by s.149 of the Equality Act in determining whether planning permission should be granted for this regeneration proposal. Notwithstanding the efforts to mitigate, there are a number of

adverse impacts which have been identified in this section. Members will need to keep these firmly in mind in determining the planning application. Officers have done so in making the overall planning assessment in this report.

Conclusion to equality implications

243. It is concluded that the proposed development could result in adverse equality impacts in relation to age and race, arising from the loss of the existing buildings on the site and impacts upon the businesses therein together with their customers, and the loss of the bingo hall. It is considered that with the mitigation which would be put in place in relation to the existing businesses, the proposal would safeguard and promote the objectives protected by s.149 of the Equality Act as far as reasonably possible, given the nature of this major regeneration proposal which would undoubtedly bring about significant change. The quality of mitigation for the loss of the bingo hall is less certain at this stage for the reasons outlined above. The loss of this facility could therefore result in adverse equality impacts, particularly during construction, and Members will need to keep this firmly in mind when determining the planning application.

Summary of equality impacts of the planning application

244.

Character-istic	Effect	Reason	Mitigation
Age	Negative	Displacement of older business owners. Older business owners may find relocation difficult.	Measures in local business support and relocation strategy.
	Negative	Large elderly community regularly use the bingo hall.	Information on closure, events in new cinema and LCC building, feasibility study for additional space in the east site basement which could be used for leisure purposes.
	Negative	Impact upon young people from closure of young stroke survivors charity.	Measures in local business support and relocation strategy.
	Positive	Increased access to open space and pedestrian routes would benefit older people and children.	
	Positive	Station box to facilitate and upgrade to the Northern Line Ticket Hall would provide a more accessible station for people of all ages.	

	Positive	Young people may benefit from the provision of affordable homes.	
	Positive	Young people may benefit from increased access to employment.	
Disability	Positive	Inclusive and accessible design principles have been considered and measures would be incorporated into the design.	
	Positive	10% of the housing would meet the M4(3) wheelchair standards.	
Gender reassignment	Neutral	No effects identified.	
Marriage and civil partnership	Neutral	No effects identified.	
Pregnancy and maternity	Positive	Inclusive and accessible design principles have been considered and measures would be incorporated into the design.	
Race	Negative	There is a high proportion of business owners (and their employees and customers) from BAME backgrounds who would be displaced from the site.	Measures in local business support and relocation strategy.
	Negative	There is a high proportion of Bingo Hall customers from BAME backgrounds.	Information on closure, events in new cinema and LCC, feasibility study for additional space in the east site basement which could be used for leisure purposes.
	Negative	Closure of charity which supports victims of crime which could be used by people from	Measures in local business support and relocation strategy.

	Positive	BAME backgrounds. Increased retail employment is, on average, expected to provide a disproportionate number of jobs to local ethnic minority residents, some of whom may otherwise face barriers to employment	
Religion or belief	Neutral	There are a number of business owners from minority religious beliefs who would be displaced from the site. Effects are not expected to differ depending on religion or beliefs.	
Sex	Neutral	No effects identified.	
Sexual orientation	Neutral	No effects identified.	

Environmental impact assessment

245. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether they constitute Schedule 1 (mandatory) or Schedule 2 (discretionary) development in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended). In this case the proposed development falls under Schedule 2, Category 10b 'urban development project' of the EIA Regulations where the threshold for these projects is development including one hectare or more of urban development which is not dwellinghouse development, development including more than 150 dwellings, and development where the overall area of the development exceeds 5 hectares. The development would provide more than 1 hectare of development which is not dwellinghouse development, and would provide more than 150 dwellings. Notwithstanding this, an EIA is only required if it is likely to generate significant environmental effects having regard to the criteria set out in Schedule 3 of the Regulations, which include:

- the characteristics of the development;
- the environmental sensitivity of the location; and
- the characteristics of the potential impact.

246. It is considered that the proposed development would generate significant environmental effects based upon a review of Schedule 3, and therefore an EIA is required.

247. Prior to the submission of the application the applicant requested a formal 'Scoping Opinion' under Regulation 13 of the EIA Regulations, to ascertain what information the

Local Planning Authority considered should be included within the Environmental Statement (ES) (application reference 15/AP/4122).

248. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES including any further information, together with any representations made by consultation bodies and any other person about the environmental effects of the development.
249. The ES must assess the likely environmental impacts at each stage of the development programme, and consider impacts arising from the demolition and construction phases as well as the impacts arising from the completed and operational development.
250. It is not necessarily the case that planning permission should be refused if a development has the potential to have significant adverse impacts; it has to be decided whether any of the identified adverse impacts are capable of being mitigated, or at least reduced to a level where the impact would not be so significant or adverse as to warrant a refusal of planning permission.
251. It is noted that the EIA regulations were amended this year. However, the amendments came into force on 16th May this year, and for planning applications accompanied by an ES which were submitted before this date, the 2011 Regulations continue to apply.
252. The submitted ES comprises the Main Text and Figures, Technical Appendices, Townscape, Visual and Built Heritage Assessment, and a Non-Technical Summary. It details the results of the EIA and provides a detailed verification of the potential beneficial and adverse environmental impacts in relation to the proposed development, including the following areas of impact (in the order that they appear in the ES):
 - Socio Economics
 - Transportation
 - Noise and Vibration
 - Air Quality
 - Ground Conditions and Contamination
 - Water Resources and Flood Risk
 - Archaeology
 - Wind
 - Daylight, Sunlight and Overshadowing
 - Cumulative Effects
 - Townscape, Visual and Built Heritage Assessment (ES Volume 3)
253. In assessing the likely environmental effects of a scheme, the ES must identify the existing (baseline) environmental conditions prevailing at the site, and the likely environmental impacts (including magnitude, duration, and significance) taking account of potential sensitive receptors. It further identifies measures to mitigate any adverse impacts, and a summary of potential positive and negative residual effects remaining after mitigation measures included in the ES in order to assess their significance and acceptability.
254. The impacts of the proposed development are expressed as:

- Adverse – detrimental or negative; and
- Beneficial – advantageous or positive.

255. In terms of the significance of the effects, the ES describes these as:

- Moderate or substantial effects are deemed to be 'significant';
- Minor effects are considered to be 'significant', although they may be matter of local concern; and
- Insignificant effects are considered to be 'not significant' and not a matter of local concern.

256. Local effect means affecting neighbouring receptors and wider effects are considered on a district (borough) and regional (Greater London) level. Effects on other parts of the country or England as a whole are considered as national level, and abroad is considered as 'international' level.

257. Additional environmental information or 'Further Information' was received during the course of the application and in accordance with Regulation 22 of the EIA Regulations all statutory consultees and neighbours have been re-consulted in writing, site notices have been displayed and an advertisement has been displayed in the local press. The assessment of the ES and Further Information and the conclusions reached regarding the environmental effects of the proposed development as well as mitigation measures (where required), are set out in the relevant section of this report, although cumulative impacts are considered below.

Alternatives

258. Schedule 4 of the EIA Regulations sets out the information that is required for an ES, which includes an outline of the main alternatives considered. The ES considers two alternative options which are the 'no development' alternative and 'alternative designs'.

The 'no development' alternative

259. This option would leave the site as it currently exists. This was not considered to be a preferable option by the applicant and the ES advises that without redevelopment, the site would be likely to remain under-used and would result in a number of missed opportunities for the site and the wider opportunity area including:

- Continued deterioration of the existing buildings on-site and the site environment over time;
- No creation of a new and vibrant mixed-use neighbourhood on the site;
- No provision of new homes including affordable housing on the site;
- No job creation as a result of the provision of additional commercial floorspace;
- No improvement to the public realm and pedestrian accessibility and no provision of open space on the site;
- No improvement in the provision of cultural and entertainment facilities; and
- No improvement in public transport accessibility.

260. In light of this the 'No development' scenario has been discounted by the applicant. Whilst it is noted that the existing shopping centre could be refurbished which some neighbouring residents have suggested, it is unlikely that this would have been able to address issues such as the need to improve access to the Northern Line station, to provide a strong retail frontages to the surrounding streets, and a significant quantum of residential accommodation.

Alternative designs

261. The ES advises that a number of alternative designs were considered as a response to key site constraints, together with responses to formal consultation with key stakeholders including with the council and the GLA. The initial proposals only included the east site which was purchased by the applicant in 2013, and the west site was incorporated mid 2015. Design changes made to the east site before the planning application was submitted include changes to the location of the Northern Line ticket hall which was initially shown in a more central position and relocation of the proposed cinema from plot E3 to E2 to reduce overshadowing of The Court. A number of servicing options were considered including servicing via the existing ramp to the basement, through the basement of Elephant One, from Walworth Road, and the current proposal. The ES advises that the current servicing proposal was selected because it would be contained within the envelope of the new LCC building and would not compromise the public realm. On the west site changes included the extension of Pastor Street to the north, and provision of the cultural venue.

Alternative sites

262. The ES does not advise whether any alternative sites have been considered. Officers note however, that the east site is a development site in the saved Southwark Plan and the Elephant and Castle SPD, and both sites are within the central activities zone, the opportunity area and the SPD central character area. The SPD advises that within the central character area development provides the opportunity of improving its appeal as a shopping area, and given the prominent location of the east site above a tube station and which contains an existing shopping centre, it is considered to be the most appropriate in the area for attracting national comparison retailers. Moreover, the SPD identifies the east site as a potential location for tall buildings.
263. Officers concur that there are a number of problems with the east site including poor connections with the wider area and poor quality public realm. Refurbishment of the existing site including the shopping centre would not address these concerns or deliver the wider vision for the opportunity area. The proposal would contribute significantly towards meeting the targets for new homes and jobs in the area. As such, it is considered that the ES is satisfactory in demonstrating that alternative options have been considered, and that the applicant has adequately addressed this aspect of the EIA Regulations.

Cumulative developments

264. Chapter 16 of the ES considers the likely cumulative impacts of the development during the demolition and construction and completed and operational phases of the development. Two types of impacts have been considered; type 1 is the combination of individual effects from the proposed development on a particular receptor, such as noise, dust and visual impact, and type 2 is the combination of effects from the proposed development and other developments in the surrounding area which when considered in isolation could be insignificant, but when considered together could result in a significant cumulative effect.
265. The ES concludes that during demolition and construction a combination of effects from noise, vibration and dust, together with visual and traffic effects arising from the proposed development could be experienced. There are a number of other schemes in the surrounding area and so similar construction work on the other sites combined

with the proposed development would be likely to result in temporary local adverse impacts through increased traffic and noise. It is acknowledged that these impacts may not necessarily be short term given the anticipated construction period, although they would be minimised as far as possible through demolition and construction management plans.

266. Regarding cumulative impacts arising from the completed development, the ES predicts that these would generally be minimal, with a number of notable exceptions. There would be beneficial cumulative impacts in relation to job creation, the delivery of additional housing, and reductions in surface water run-off. Moderate to substantial long-term adverse impacts would be experienced by a number of neighbouring properties in relation to daylight and sunlight, together with overshadowing of a green space to the south of Albert Barnes House which is on the northern side of New Kent Road, although this would primarily be due to the consented development on the Heygate Estate.
267. The overall conclusion of the ES is that for the majority of environmental impacts, the residual effects of the proposed development (demolition, construction, and operational phases) following mitigation would be insignificant. However, there are likely to be some adverse minor effects, particularly during the demolition and construction phases and traffic related long-term effects from the completed development. The impacts have been categorised as follows:
268. *Adverse residual effects of minor significance of varying duration:*

A loss of existing retail and leisure floorspace during demolition and construction (temporary);

New access roads from the site would lead to increased traffic flows arising from demolition and construction related traffic onto and off the site (temporary);

As a result of the increased population on the site there would be increased operational development traffic flows on the surrounding local highway network from the completed development (long-term);

There would be a local increase in disturbance of pedestrian and cycle routes during the demolition and construction with effects of minor significance (temporary);

There would be a minor effect on public transport users as a result of the demolition and construction phases causing temporary effects to local routes (temporary);

As a result of construction and demolition, under a worst-case scenario there would be moderate, temporary increases in noise at adjacent sensitive receptors at Oswin Street and Metropolitan Tabernacle (temporary);

Temporary minor increases in vibration would be experienced, at worst, by sensitive receptors on Oswin Street and the Metropolitan Tabernacle as a result of construction and demolition activities (temporary);

A number of properties within close proximity to the site (Oswin Street and 1-84 Hayles building) would have reduced daylight and sunlight (effects ranging in significance between Insignificant to substantial, long-term);

There would be a long-term minor increase in transient overshadowing as a result of the Development;

The completed development would result in varying reduction in sun hours on ground (0 to 40%+) in the local area due to the increase in massing (effects ranging in significance from insignificant to substantial, long-term);

There would be a minor to moderate effect for the majority of viewpoints from the Development;

The new façades would reduce solar glare from the development with the effects ranging in significance between insignificant to substantial).

269. *Long-term beneficial effects of varying significance:*

The development would result in the provision of an additional 979 housing units including 'build for rent' and 36% affordable housing overall; Improved population and labour market would provide a long-term benefit at both district and local level (effects ranging in significance between moderate to substantial beneficial);

There would be an estimated overall net gain in the number of full-time equivalent jobs supported by the proposed development;

The development could generate additional household expenditure as a result of jobs created in association with the site, enhancing the local economy, and supporting further direct and indirect employment;

Increased sustainable travel as a result of the implementation of the sustainable travel patterns commitment. This would include improved pedestrian permeability and increased site wide cycle facilities and public realm improvements;

There would be reduced ground contamination and leaching into shallow groundwater from the site, which would have a long-term minor beneficial effect;

The completed development would decrease pluvial (rainfall) and surface water flood risk owing to a surface water drainage strategy, the result of which would be long-term beneficial and of minor significance;

Wind conditions in thoroughfares across the site would be improved (effects ranging in significance from Insignificant to minor beneficial). Conditions surrounding building entrances would be acceptable (effects ranging from minor adverse to minor beneficial); conditions would remain acceptable for cyclists and wind conditions would improve at bus stops (effects ranging in significance between Insignificant to minor beneficial).

270. *Temporary, short to medium term beneficial effects:*

The creation of 1,230 construction jobs over the approximate 10-year construction period.

271. Officers have taken into account the information in the ES, together with consultation responses received following public consultation on the application. *The applicant has reviewed the ES in light of the amendments made to the proposal and officers consider that the changes to the proposal would not give rise to any new, additional or different likely significant effects from those already identified within the ES including cumulative effects.* It is recognised that there would be adverse impacts upon neighbouring properties in relation to daylight and sunlight. Officers also consider that there would be a major, albeit beneficial, impact on the setting of the Elliott's Row Conservation Area, and minor adverse impacts in relation to wind microclimate (although mitigation could be secured by way of condition). These adverse impacts must therefore be weighed in the balance with all of the other benefits and disbenefits arising from the application, and Members are referred to the conclusion to this report which draws these issues together.

Design, heritage assets and tall buildings including views

272. The proposal seeks to re-develop two prominent sites at the heart of the Elephant and Castle area. The two sites are separated by the north-south road, Elephant and Castle. The Shopping Centre site currently includes the modernist podium block and shopping centre, as well as the commercial tower of Hannibal House. Also included on the site is the main entrance and ticket hall for the Northern Line Underground Station

as well as the main western access to the Elephant and Castle Rail Station which is accessed via the shopping centre. Finally, the Coronet, a former playhouse and now a music venue, the Charlie Chaplin public house, a dental surgery and news agents on New Kent Road are also on the site.

273. The second site is that of the London College of Communications bounded by St George's Road to the north and Oswin Street to the west. The site encircles the Metropolitan Tabernacle, a substantial and prominent place of worship, the façade of which is grade II listed. The recently completed Elephant and Castle Leisure Centre and Elephant One tower are located immediately to the south of this site. Immediately to the west of the LCC site is the Elliott's Row Conservation Area, an area characterised by historic mansion blocks and terraced houses.
274. Concerns have been raised following consultation on the application. These include objections regarding demolition of the shopping centre and Coronet Theatre, harm to the setting of neighbouring listed buildings and conservation areas, that there would be too many tall buildings in the area resulting in an unattractive urban environment, and that the west site is not identified as being appropriate for tall buildings in the Elephant and Castle SPD.

Heritage Assets

275. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes the duty on local planning authorities to have special regard to the desirability of preserving or enhancing a listed building and its setting or any features of special architectural or historic interest which it possesses. Further, special attention should be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. This is also reflected in the NPPF (2012) and supporting NPPG (2014), and requires all development to conserve or enhance heritage assets and their setting and avoid causing harm. Designated heritage assets include Statutory listed buildings and designated conservation areas.
276. The application sites do not include any listed buildings and are not located in a conservation area, *although Members are advised that on 22nd May 2018 Historic England notified the council that they have received an application to list the shopping centre and, in response, the applicant has applied to Historic England for a Certificate of Immunity from listing in relation to the shopping centre. The timescale for a decision on these applications is not known but is unlikely to be before this application is presented to the Planning Committee. If Members resolve to grant permission, it would therefore need to be subject to confirmation from Historic England that the shopping centre has not been listed. In the event that the shopping centre does become listed, officers would be required to present a further report to the Planning Committee to reconsider the proposals in light of the new information.* The Coronet Theatre was recently considered for listing by Historic England but rejected.
277. The scale of the proposed development would be such that it is necessary to consider its impact on a number of conservation areas, both in Southwark and Lambeth. The nearest listed buildings include: The grade II listed Michael Faraday Memorial, the Metropolitan Tabernacle, Metro Central Heights (former Alexander Fleming House), the group listed properties in West Square, and the former Church of St Jude. Its influence is likely to extend to the grade II* listed Obelisk at St George's Circus and the grade II listed Imperial War Museum.
278. Undesignated heritage assets nearby include the railway viaducts that criss-cross the

area. The spaces on either side of the viaduct have been highlighted in the draft New Southwark Plan as the 'Low-Line', a series of linked spaces and thoroughfares which would hug the viaduct and introduce a broad range of uses in the railway arches. The Coronet Theatre is also an undesignated heritage asset. It is currently located on the Shopping Centre site. It was recently considered for listing by Historic England but not recommended for statutory listing.

279. The affected conservation areas would be as follows:

Southwark

St George's Circus Conservation Area
 King's Bench Conservation Area
 Trinity Church Square Conservation Area
 Larcom Street Conservation Area
 The Pullens Estate Conservation Area
 Elliott's Row Conservation Area
 West Square Conservation Area

Lambeth

Renfrew Road Conservation Area
 Walcot Conservation Area

280. Officers have considered the impact of the proposal, both on its own and cumulatively with other consented or implemented proposals in the area. The criteria used is current guidance including 'Seeing History in the View' (Historic England 2015) which recommends that an assessment of the magnitude and quality of any impact are considered.

281. The framework used is included in the above guidance and requires Local Planning Authorities to consider the magnitude of the effect as well the quality of effect. This is mainly considered in the views taken in and around the area. The views have been selected to ensure that the greatest visual impact is recorded and selected relative to their effect on the significance of heritage assets.

282. **Magnitude of effect**

None	No effect
Negligible	Imperceptible effect
Minor	Slight effect
Moderate	Clear effect
Major	Major effect

Quality of effect

Adverse	The quality of the environment is diminished or harmed
Neutral	The quality of the environment is preserved or sustained or there is an equal balance of benefit and harm
Beneficial	The quality of the environment is enhanced.

283. In the main, the visual intrusion into the identified heritage assets has been found to be moderate and beneficial and not causing any harm. There are a number of heritage assets where the incursion is likely to be greater. These are considered below.

The Metropolitan Tabernacle (grade II listed building)

284. The views submitted with the application demonstrate that the tallest tower on the western site (W2) would be significantly closer to the Tabernacle than the recently completed One the Elephant development to the south. The proposal would result in the northern flank of the Tabernacle being exposed, and a benefit delivered by the scheme would be the completion of this exposed flank in stone, with a returning cornice to match the southern end of the Tabernacle which also has a cornice returning along its southern face.
285. The design approach has been to match that of the One the Elephant development and has sought to complement the Tabernacle with a low, stone-faced music venue building on the north side and to set the tower back from and to the north of the Tabernacle. This would mean that in a straight-on view from the opposite side of Elephant and Castle the silhouette of the Tabernacle would be largely preserved and could be viewed against the sky. As one moves around and to the south of the proposed towers on plot W2 would interact with and dominate the view, however this would be a more incidental, oblique townscape view that would include a number of existing towers and one where the quality of the design, its composition and materiality, would be better appreciated. Officers have concluded that the magnitude of the effect of the proposal on the Tabernacle would be major (meaning there is a clear effect), and that the quality would be neutral (meaning the quality of the environment would be preserved or sustained and there would be an equal balance of benefit and harm).
286. Concerns have been raised by the Metropolitan Tabernacle as to why tower 3 on plot W2 could not be relocated further from the Tabernacle. The location of the towers on the west site was influenced by the protected view from The Serpentine Bridge (LVMF View 23A.1). In the case of tower W3, the building sits in the shadow of Victoria Tower as viewed from The Serpentine. If tower W3 were to be located a similar distance from the Tabernacle as the One The Elephant tower it would need to move to the north, approximately to the location of tower W2. In this location it would have to be significantly lower to avoid any incursion into the Strategic View – and would also likely involve the loss of a substantial amount of housing, especially if it requires the loss of tower W2 to the north. Notwithstanding this, such a move would not avoid causing harm to the Tabernacle and, in the view of officers, the improvement in townscape terms would be marginal. The impact of relocating tower W3 on the setting of the Tabernacle in terms of magnitude and quality would remain major and neutral as outlined in this report.
287. The Metropolitan Tabernacle has also raised concerns that whilst the change to the facing materials for the cultural venue are welcomed, the proposed windows would appear incongruous. In this location officers referred to the One the Elephant development to define the main design principles for the proposed cultural venue. These included: its building line (the alignment of the façade relative to the Tabernacle), its parapet height and width (symmetrical in proportion); and the cladding materials (stone). This ensured that, when the development is viewed from the east, the three buildings would complement each other with the two flanking buildings being symmetrical to the Tabernacle in their alignment, proportions and materiality. Beyond these key principles it was not considered necessary to mimic the windows of One The Elephant on the cultural venue, but to reflect the bay design of that building. This is not simply because they are a different development, but because of their difference in function – one is a residential building and private in character, whilst the

other would be a cultural building with a more civic function. Due to its civic character it was considered appropriate that the cultural venue have larger openings.

288. The legal duties referred to above require that substantial weight is placed on any harm to listed buildings. Officers consider that there will be some harm to the oblique view of the of the Tabernacle. It is necessary to place substantial weight on that harm. The NPPF (2012) and the associated NPPG (2014) guide Local Planning Authorities to balance the harm (weighed as indicated) against the benefits of the proposal. In this case, there are substantial public benefits to the development (which includes the works to enhance the Tabernacle itself, the substantial contribution to the public realm, the complimentary design of the new cultural venue immediately adjacent to the Tabernacle, and the exceptional quality of the design of the tower which would be elegant, calm and with appropriate cladding materials which would complement the historic building). Officers are satisfied that the public interest is such as to decisively outweigh the harm identified above notwithstanding the special regard that must be placed on it by the legal duties identified above.

West Square Conservation Area

289. In the main the visibility of the proposed development would be limited to the edges of the conservation area along Brook Drive and St George's Road. In these locations the impact on the views would include the wider non-historic townscape and a number of towers in and around the Elephant and Castle area to which this proposal would be a high quality addition . They do not affect the significance of the conservation area. In the main therefore the magnitude of the effect is considered to be *minor* (meaning a slight effect) and the quality *beneficial* (meaning the quality of the environment is enhanced).
290. From West Square itself, the views submitted with the application demonstrate that the magnitude of effect of the two towers on the western site (W2) would likely be *moderate* to *major* (meaning clear to major effect), whilst the quality of the effect is likely to be *neutral* (meaning the quality of the environment is preserved or sustained and there is an equal balance of benefit and harm).
291. Consultees have raised concerns about the impact of the proposal on the West Square Conservation Area. During the course of the application additional views have been prepared which demonstrate that the proposed towers in plot W2 would be visible from within the landscaped garden at the centre of West Square, around the chimneys of the houses facing the Square. From this sensitive location the magnitude of the effect is considered to be *minor* (meaning slight effect) and the quality of the effect *neutral* (meaning the quality of the environment is preserved or sustained and there is an equal balance of benefit and harm).
292. Officers are satisfied that there would be no harm to the character or appearance of the West Square Conservation Area or its historic significance. As such on officers assessment there is no conflict with the legal duties identified above. If members were to disagree, then it would be necessary to place substantial weight on any harm identified but also to consider whether such harm would be outweighed by the by the public benefits of the proposed development which include the substantial contribution to the public realm and the exceptional quality of design of the towers which would be recessive when viewed from West Square.

Elliott's Row Conservation Area

293. The Elliott's Row Conservation Area is predominantly made up of large mansion blocks arranged along north-south streets linking Brook Drive to St George's Road. The scale of the historic buildings and the relatively narrow proportions of the streets mean that there is limited visibility of any of the taller buildings in the Elephant and castle core area from within the conservation area.
294. In the main the visibility of the proposed development would be limited to the edges of the conservation area along Brook Drive and St George's Road. In these locations the impact on the views would include the wider non-historic townscape and a number of towers in and around the Elephant and Castle area, to which this proposal would be a high quality addition. They would not have any adverse impact upon the character and appearance of the conservation area. In the main therefore the magnitude of the effect is considered to be *major* and the quality to be *neutral* (meaning that the quality of the environment would be preserved because there would be no harm).
295. The views submitted with the application demonstrate that the greatest visibility of the development would be from the allotments on Elliott's Row where the magnitude of the effect of the three towers on the western site is likely to be *major*, especially when considered together with the One the Elephant and Strata development which are also visible in this view. The quality of the effect is likely to be *beneficial*.
296. Officers are satisfied that the character and appearance of the conservation area would be preserved by the proposed development. It is recognised that there would be some significant change in views within the conservation area, especially around the junction of Hayles Street and Lamlash Street. However, the affected view would be of the backs of the properties on Elliott's Row and would not affect the historic significance of the conservation area, especially as the development would appear as a backdrop in the middle distance. In officers judgment the impact of this change would be on balance neutral and accordingly officers are satisfied that the character and appearance of the conservation area would be preserved. Were members to disagree and consider that there is harm to the character and appearance of the conservation area arising from this change, then it would be necessary to place substantial weight on that harm given the legal duties identified above. The NPPF (2012) and the associated NPPG (2014) guide Local Planning Authorities to balance the harm (weighed as indicated) against the benefits of the proposal. That balancing exercise would need to consider whether the harm was outweighed by the substantial public benefits of the development which include the contribution to the public realm and the exceptional quality of design of the towers which would consolidate the cluster around the core of the Elephant and Castle Opportunity Area

Undesignated heritage assets

297. The proposal preserves the undesignated heritage assets on and around the site with the exception of the Coronet which is proposed to be demolished to make way for the new LCC building. This heritage asset is not statutory listed and not listable. In these circumstances the NPPF (2012) and the associated NPPG (2014) guide Local Planning Authorities to balance the loss of an undesignated heritage asset (weighed as indicated) against the benefits of the proposal.
298. Officers are satisfied that any harm arising from the loss of this undesignated heritage asset is outweighed by the substantial public benefits of the development which include the contribution to the public realm, the improvements to the London Underground Station and the exceptional quality of design of the new UAL Building.

Conclusion to heritage assets

299. As identified in the above analysis, in most respects officers are satisfied that the proposed development would not have any harmful impact on designated heritage assets. The exception identified above is that there would be some harm to the grade II listed Metropolitan Tabernacle. Substantial weight must be placed on this harm given the need to have regard to the desirability of preserving or enhancing the special character of listed buildings and their setting. However, as identified above, it is considered that even placing substantial weight on this harm in accordance with the specific legal duty, it would be outweighed by the public interest considerations identified above. That balance is consistent with the guidance in the NPPF and NPG. There would be significant changes to the views from within the West Square Conservation Area and the Elliott's Row Conservation Area as has been discussed above. Officers' assessment is that the character and appearance of the conservation area would be preserved because the changes which would occur would not be harmful (as discussed in detail above). If members were to take a different view of these impacts, it would be necessary to place substantial weight on any harm to the character and appearance of the conservation areas given the legal duty identified above. The adverse impact arising from the loss of the Coronet (an undesignated heritage asset) is considered above and must be weighed in the balance against the public benefit (as discussed above).

Urban form and arrangement

300. The east site is at the core of the town centre. It is an 'island' site completely surrounded by busy arterial roads and flanked by the elevated railway line. As described in the details of proposal section of the report the proposal would accommodate: a new shopping centre; a new station box for London Underground, a new university campus for the London College of Communications; and three residential towers. On the west site the proposal is for a mix of residential and commercial uses as well as a new music venue and including three residential towers.
301. The urban form chosen for the east site has been to establish a network of radiating pedestrian 'streets' which would penetrate site and divide it into four blocks (E1, E2, E3 and E4). The northern-most block (E1) would accommodate the new Northern Line ticket hall and LCC building, whilst the others would provide the main retail spaces. At the centre of the site there would be a narrow 'court' which would be the focus of the two new routes and the entrance to the overground railway station. Three towers would be located on the southern half of the site, the tallest of which would be at the centre (plot E2), with the others located at either end of plot E3.
302. On the west site the proposed arrangement would divide the site in two with a new north-south route which would extend Pastor Street northwards to connect with St George's Road. In this way, the long and narrow north-south urban arrangement of the site would reflect the historic development of the Elliott's Row Conservation Area to the west which is arranged in similar north-south blocks. The site would be further split into three plots (W1, W2 and W3). W3 would be a long linear mixed-use block facing onto Oswin Street. At the northern end of the site there would be a small public space which would mark the arrival onto the northern roundabout and an important destination for access to the Underground – for both the Bakerloo Line and the Northern line stations. To the north of the Metropolitan Tabernacle there would be a new cultural venue, a simple, rectilinear form which has been designed to mirror the recently completed One the Elephant development. Finally, three towers would be sited on the northern half of the site. The first tower would be located at the junction of

Oswin Street and St George's Road (W1), and the others would step up in height towards the middle of the site (W2), the tallest being immediately adjacent to the Tabernacle.

303. The proposed urban form and the arrangement of blocks would be appropriate for both sites. They give the scheme a clear and logical order built around the key pedestrian desire lines. The radiating routes on the east site pick up on the main pedestrian approaches to the site and divide the site logically along these key desire lines. On the west site the urban form enables the creation of an appropriate residential edge to the site which would complement the residential character of Oswin Street. By extending Pastor Street across the site the proposal focusses the commercial activity at the centre of the site and joins up a key pedestrian desire line that starts from the St Mary Churchyard to the south and extends to the transport interchange at the northern roundabout.

Tall Buildings

304. As the proposal involves a substantial number of tall buildings on both sites, it needs to be considered against all the requirements of saved policy 3.20 of the Southwark Plan which requires that all tall buildings should:
- i) Makes a positive contribution to the landscape; and
 - ii) Is located at a point of landmark significance; and
 - iii) Is of the highest architectural standard; and
 - iv) Relates well to its surroundings, particularly at street level; and
 - v) Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

Taking each of these in turn

i) Makes a positive contribution to the landscape

305. Landscape and the public realm is an important part of any proposal for a tall building. It will not only create a setting for the tower, allowing it to 'land' appropriately, but also an opportunity for such a development to demonstrate the benefits that can flow from expanding vertically in this way freeing up more space at grade in a congested part of the city such as this. This part of Southwark is characterised by busy arterial routes overlaid with important pedestrian thoroughfares. The site is located at the core of the Elephant and Castle town centre, as well as important transport links by bus, rail and the Underground.
306. The public realm would be made up of a number of new routes introduced across the sites and two new public spaces – the new 'court' at the centre of the east site and the public space at the northern end of the west site. On the east site the new routes are designed as pedestrian 'streets' which would encourage movement towards the centre of the site and offer access to the 'court' and the railway station to the east. These routes would be well proportioned and appear like narrow streets typical of this area. They would help to break up what could become a large impenetrable block, and introduce active uses onto the routes.
307. The Court would be at the confluence of the new routes and its focus would be plot (E4) at the centre of the site. This would be a key location for the site and an important destination for visitors seeking to change to or from the railway line. This station serves the Thameslink line which is likely to face a significant uplift in passenger

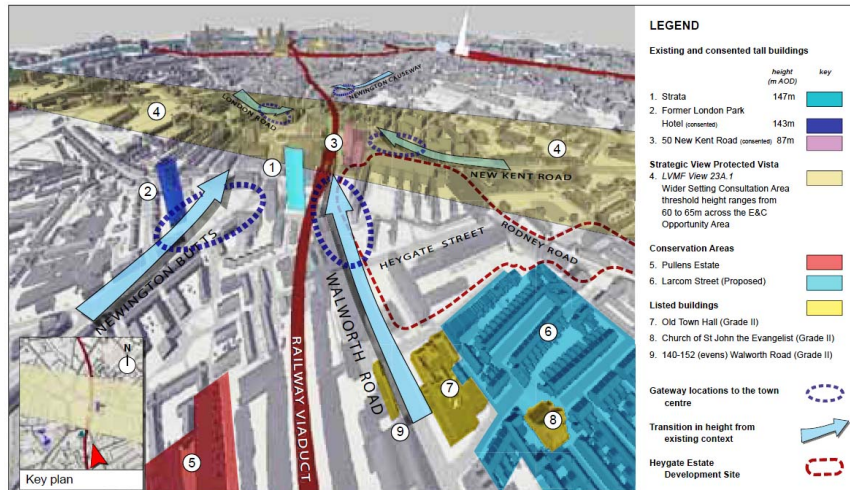
numbers in the years to come. This public space at the centre of the site would also serve as a brief respite for visitors, commuters and shoppers alike from the busy, traffic dominated surroundings of the site. The function of this space would therefore be threefold: it would be a destination for visitors to the area, a new front door to the elevated railway station, and a new route across the site. Block E4 has been kept deliberately low in scale – just 4 storeys in height – and would allow sufficient space at the centre of the site to fulfil these three roles adequately. This space would be 954sqm, a similar size to the South Bank Centre food market.

308. Finally, on the east site the proposal includes a number of elevated gardens for residents. These elevated gardens are well designed, and would include bridges that would link across from plot E2 to E3 and would complement the communal offer provided within the towers.
309. On the west site the public realm would be less constrained. The extended Pastor Street would work well and would become the main address for the two new towers in plot W2, whilst the new public space at the northern end would be appropriate in scale and proportion to act as a suitable destination. At this northern end of the site the public space has to contribute to the idea of Elephant Square - the focus of the area and the address of two Underground stations. This is not only a busy trafficked area but also a destination for residents and visitors alike. The key frontage onto the notional 'square' defined by Perronet House and Metro Central Heights is also the main façade onto the northern roundabout and has an axial relationship with Newington Butts to the south. The landscape would reinforce the 'square' and complement the surviving buildings in it.
310. Finally, on Oswin Street the building line of the proposed mansion blocks has been set back sufficiently to preserve the mature trees which would ensure that the public realm feels generous and helps to screen the proposed development beyond. Care should be taken to ensure that the existing line of trees is preserved and additional measures to protect the line of trees during the course of construction should be reserved by way of a condition.

ii) Is located at a point of landmark significance

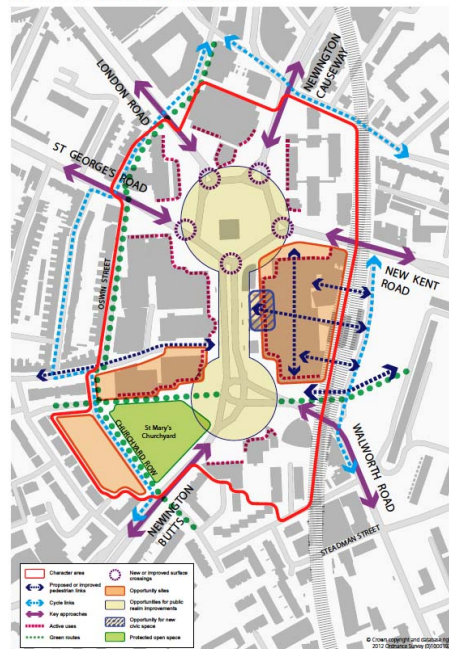
311. The definition of a point of landmark significance is the subject of the adopted Elephant and Castle SPD which concludes that the site is an appropriate location for tall buildings at the confluence of important routes and the focus of many views in this location. Both parts of the site are located in the Central Character Area which extends from Skipton House in the north to Strata and the St Mary Churchyard to the south, and from Oswin Street in the west to the railway viaduct in the east. The SPD described the morphology of the cluster at the core of the Opportunity Area and emphasises that building heights should rise towards the Central Character Area. (Fig 14 Elephant and Castle SPD (2012) p57)

Tall buildings strategy (view from south)



312. The sites are considered in detail in the indicative proposals map for the Central Character Area (Fig 19 Elephant and Castle SPD (2012) p78) which highlights the shopping centre site as an 'opportunity site'. Whilst the LCC site is not specifically highlighted as an 'opportunity site', this does not suggest that the site is not appropriate for a tall building. In the same document the Skipton House site is not identified in this way, and yet the council resolved to grant permission for two tall buildings on that site. Officers are satisfied that the both parts of the application site are located at a point of landmark significance and accord with the guidance in the adopted SPD.

Indicative proposals for the central character area



iii) Is of the highest architectural standard

313. The scheme is made up of a number of buildings all contributing to the whole, and each designed in its own right to respond to its functional requirements and the role it would play in the overall composition. When we consider the quality of design we consider the fabric, function and composition before we can conclude that they are of

exceptional quality of design. Fabric relates to the cladding material and its appropriateness in the context of the Elephant and Caste town centre; function includes (for residential buildings) an assessment of the quality of accommodation, dual aspect etc.; and composition is an aesthetic assessment of the whole; the arrangement of windows, features and, where tall buildings are involved, the design of the base, middle and top.

314. The E&C SPD includes additional design guidance in respect of tall buildings and requires developments to ensure that they:

Conserve the Outstanding Universal Value (OUV), integrity and authenticity of both the Westminster and Tower of London World Heritage sites and their settings.

Have due regard to the London View Management Framework (LVMF), World heritage Management Plans and conservation area appraisals.

Conserve or enhance the significance of heritage assets and their settings including listed buildings, locally listed buildings, conservation areas, registered parks and gardens and archaeological remains.

Help reinforce way-finding and the legibility of the area.

Help reinforce the hierarchy of spaces and streets in the area; the amount of public space provided at ground level will be expected to be proportionate to the height of a building.

Help reinforce the character and function of the area; they will be expected to interact with the streetscape providing a generously proportioned active frontages at their base.

Achieve visual separation from adjoining development around the base of the building. Demonstrate a considered relationship with other tall buildings and building heights in the immediate context; cumulatively, tall buildings should not coalesce visually to form a single mass.

Ensure that buildings which will have a significant impact on the skyline are slender and elegant with regard to the width-to-height ratio; they should be attractive city elements with a strong geometry when viewed from all angles and the tops of buildings should be well articulated and recessive.

The skyline and relationships between buildings should help reinforce the character and identity of the area and contribute positively to London's skyline, when viewed locally and in more distant views.

Allow adequate sunlight and daylight into streets, public spaces and courtyards.

Avoid harmful microclimate and shadowing effects or adverse affects on local amenity.

Demonstrate an exemplary standard of design, provide high quality accommodation which significantly exceeds minimum space standards and promote housing choice by providing a mix of unit types.

Incorporate communal facilities for residents.

315. The proposal currently has the capacity to meet and exceed all of these tests. Taking each building in turn.

Plot E1, The new education building

316. This would be a well composed and highly articulated block. It has been designed to meet the requirements of the College which includes a new programme of public events which would improve public access to their collection. The design would accommodate this new public function and include publicly accessible spaces, galleries and meeting spaces on the lower floors which would turn it into a public building with a significant presence at the northern end of the site. Also included in this block, at its northern-most row, would be the new Northern Line entrance and ticket

hall. This is a key location for the new entrance and it would be a significant feature of this building. The entrance is designed to be immediately recognisable, generous and accessible. It would lead to the ticket hall which would be located underground, and has been engineered to offer escalator access to all platforms.

317. This building is proposed to be clad in a dark grey glass-reinforced concrete (GRC), contrasted with natural metal finished windows. The façade uses the device of a 'printer's tray' composed of deep openings in a vertical orientation, which borrows from the traditional skills delivered at the College. The design of this block is highly articulated and refined and its sculpted architectural form would be appropriate to its higher educational use. Its maximum height would be 55.2m AOD which would be comparable to the height of the tallest tower of the grade II Listed Metro Central heights on the opposite side of New Kent Road.
318. Plots E2 and E3 would make up the bulk of the retail space for the new shopping centre. They would be shaped by the new radiating routes which would feed to the centre of the site and have been designed as pedestrianised external routes lined by shops on two levels. The routes are modelled on the Shad Thames road width which would be appropriate in this intensely urban context. Care has been taken, by servicing the buildings from basement level, to ensure that all the edges would remain active with either retail frontages or residential lobbies. On the upper floors the blocks would include a larger leisure space for a multi-screen cinema. In this way the two blocks would establish a shoulder datum or podium of around 4-storeys in height which would be appropriate in the area and reflective of the prevailing height of the historic urban context including the Metropolitan Tabernacle on the opposite side of Elephant and Castle.
319. On top of the podium blocks there would be three residential towers. Two are designed as a pair of towers 79.84m AOD and 86.24m AOD and located on the main southern approach from Newington Butts. The tallest would be the tower on plot E2, made up of two conjoined blocks with a shoulder height of 103.3m AOD and a maximum height of 124.3m AOD.
320. The residential towers are designed as conjoined extruded squares which would step and reduce as they reach their full height. They are proposed to be clad in brick which would give them a clear reference to the neighbouring context. In the tallest tower on plot E2 the two extruded squares would set at an angle relative to each other, which would not only result in a highly articulated external envelope, but also means that the lift core which would be at the junction between the blocks would benefit from external windows and natural light. In effect this building would be made up of two narrow towers linked by a common core. The form of this tower is intended to be three-dimensional and interesting from several angles, as one tower would drift into view whilst the other would slide away in the round.
321. On the west site the architectural tone of the development would be established by the mansion block design of plot W3. This is intended to reflect and reinforce the established historic character of the Elliott's Row Conservation Area and Oswin Street. This linear block would be divided into three parts arranged around their main access cores. It would have a residential frontage onto Oswin Street and a commercial frontage onto Pastor Street to the rear. With a series of bays at 4-storeys, shoulders at 6-storeys (24.6m AOD) and deep set-back top rising to 8-storeys (31.5m AOD), the three blocks have been designed to complement their residential setting and establish an appropriate response to the street.

322. Block W3 has been designed as a brick-clad mansion block. Its design would be defined by its primary order of bays and blocks and secondary order of windows which would vertically arranged. The main entrances would be prominent and logical and, above the datum of maisonettes, the units would be clustered around the cores to ensure that most benefit from a dual aspect.
323. The first tower on this site is tower W1 on the northern edge of the site, at the corner of Oswin Street and St George's Road. This building is designed as a sculpted form loosely arranged around the spaces it would face, with an irregular shape at ground level which would be extruded vertically with successive steps to reveal a narrow, geometric form at the top. The steps would be linked around the heights established by plot W3 – starting at 31.1m AOD and then rising to its maximum height of 71.9m AOD. This corner is currently the location of the tallest building on the LCC site and therefore an established location for a taller element. This tower recognises the prominent location at the St George's Road junction and would make it a key gateway building at the core of the opportunity area and suitable for a tall building.
324. In its detailed design tower W1 would be elegant and uncluttered, with a façade made up of a combination of brick contrasted with stone-like inserts on the lower floors. On the upper floors, and as the building reaches its peak, the prevalent material would be the stone-like cladding which would give it a lighter expression. In this way the tone and architectural language has been established for the towers on the western site.
325. Plot W2 would be made up of a podium set at four storeys in height and topped by two towers. The podium would be set back from the edge of the street and would align with the recently complete Elephant One development. In this way it is intended to complete the composition of the Newington Butts townscape with the Metropolitan Tabernacle as the centre-piece. The podium would match the stone finish of Elephant One which was modelled on the Tabernacle, and is appropriate in this historic context. It would house a new music venue at the Elephant and Castle which would contribute significantly to the vitality of the area. Set well back and accessed from the rear on Pastor Street, are two towers are designed as two irregular shapes that would step and recede as they reach the top, ranging in height from 84.7m AOD and 119.9m AOD.
326. The detailed design of the two towers would be highly articulated, simple and composed. The podium block would work in a similar way to that of the Elephant One development. It is designed to act as an intermediary building which would address the street and introduce a visual layer in the foreground of the taller elements which would be located in the middle of the site.
327. In conclusion, the design of the scheme is considered to be of exceptional quality, with blocks which would be highly articulated, well composed, and clad in high quality materials. Each function would expressed in a distinctive manner and the two parts of the site have been designed by separate design teams (albeit from the same architectural practice) to give each building its unique architectural identity.
328. All the towers would be located directly in the backdrop of protected London View Management Frame (LVMF) View 23A.1 of the Palace of Westminster World Heritage Site (WHS) from the Serpentine Bridge. Whilst the height of the tower would exceed the threshold of the protected view (roughly at 65m AOD in this location), the information submitted with the application demonstrates that they would be set behind the Victoria Tower (at the Westminster WHS) and are not likely to be visible from the protected view.

iv) Relates well to its surroundings, particularly at street level

329. In designing the separate plots care has been taken to ensure that each element would present active frontages on all sides. Both parts of the site would be completely integrated with the city in this busy urban setting and as such, with the exception of the western face of the viaduct, the blocks are designed with 360 degree frontages.
330. On the east site the retail frontages would be concentrated on the pedestrian routes at the centre of the site. Arranged on two levels, the shopping offer is designed to form the new pedestrian routes which would be open to the sky and would appear like a shopping precinct of the city. On the perimeter of the site on the New Kent Road, Newington Butts and Walworth Road frontages, the design seeks to establish the individual addresses for the separate towers, the new Underground Station and the new education building. As they would be defined by the main desire lines in this area and with blocks that are designed with active frontages to both their inner and outer facades, the east site would be completely integrated into the city at street level. There are some concerns regarding the outward facing first floor levels of the proposed shopping centre, particularly that facing Walworth Road which would be enhanced by further detailing. It is recommended that this be secured by way of a condition. Conditions for detailed drawings of key features of the buildings together with material samples would also be required to ensure a high quality finish, and these have been included in the draft recommendation. This includes details of the retention and relocation on the east site of the elephant sculpture which is currently displayed at the front of the shopping centre.
331. The mansion block is designed as an intermediary block. It would be set well back on Oswin Street where it would be lined with the existing mature trees and residential entrances. In contrast the main commercial frontages would be located on the newly extended Pastor Street which would bisect the site. At the northern end the corner of Elephant Square would be defined by the main entrances to the cultural venue and a series of retail frontages at the base of the towers. Adjacent to the Tabernacle, the proposal would address the route which links Pastor Street to Newington Butts. In this way, the proposal for the west site would complement its urban setting. Its design respond appropriately to its residential context and responds appropriately to its surroundings.

v. Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views

332. The application is accompanied by a thorough Townscape and Visual Impact Assessment (TVIA) which includes the strategic, wider and local views. Each has been prepared in accordance with the published LVMF methodology which requires Accurate Visual Representations (AVRs) to be prepared showing the development in its setting. In the Strategic Views the submitted views demonstrate that the substantial height of the six towers would consolidate the cluster of towers in the core of the opportunity area and would avoid harm to any strategic landmarks.
333. The most sensitive Strategic View is the LVMF View 23A.1 of the Palace of Westminster from the Serpentine Bridge. The protected backdrop of this view extends across the core of the area and extends east along New Kent Road at around 65m AOD. Whilst the proposed buildings would be substantially taller than 65m, the views submitted with the application demonstrate that they would not be visible from the Protected Viewing Point which is at the centre of the bridge, from where the

development would be hidden by the substantial form of the Victoria Tower and therefore would not affect the viewer's ability to recognise and appreciate the Strategic Landmark of the World Heritage Site or affect its Outstanding Universal Value.

334. In addition, the dynamic view across the bridge has also been tested, and whilst some visibility may occur in the northern approach to the Viewing Point, any visibility would be negligible. In this approach the development would largely disappear from view soon after the northern bridgehead, and a substantial distance from the Viewing Point at the centre of the bridge.
335. In their initial consultation response Westminster City Council questioned the TVIA and commented that insufficient information has been provided with regard to the visual assessment, particularly the view from 23A.1 and Serpentine Bridge Sequence for the council to determine if there will be an impact on the setting of Westminster World Heritage Site. Westminster requested higher resolution images where it is possible to zoom in and that do not pixelate. These have been duly provided, and Westminster have confirmed that the council has no objections to the application.
336. Officers are satisfied that the Accurate Visual Representations (AVRs) submitted with the application comply with the LVMF. This is a distant view (the viewing point is over 5km or 3miles from the application site). The information submitted is acceptable and demonstrates that there would be no impact on the Strategic Landmark of the World Heritage Site.
337. In the wider views the TVIA demonstrates that the emerging cluster of tall buildings at the core of the Elephant and Castle Opportunity Area would be consolidated by the six proposed new towers. The towers would be well articulated, and would complement the existing towers which include Strata, One the Elephant, the 360 Hotel, Elephant One and Eileen House.
338. The most challenging views would be the local views where the towers would be visible from within the Elliott's Row and West Square Conservation Areas which are immediately to the west of the site.
339. The views demonstrate that the towers would be visible from one location on Elliott's Row – the allotments at Lamplash Street. Here the proposed development would be visible, with the mansion blocks on Oswin Street in the foreground and the three towers layered behind them. Whilst the view is a characterful aspect of this part of the conservation area, it is an incidental view and not one of high significance. Indeed, it was chosen simply to demonstrate the limited visibility of the development. In any case, the council's policies require development to preserve or enhance the character and appearance of the conservation area and, in this view the separation of the towers, the intermediate form of the proposed mansion blocks and the quality of the architectural design would help to orientate the viewer in the city and highlight the proximity of the town centre.
340. In the West Square Conservation Area, there would be limited visibility of the tallest tower on the west site (W3) from the square itself. The tower would be visible over the rooftops in the same way that the One the Elephant tower is visible in the area of the chimneys. This visibility would change with the seasons and would only be apparent in mid-winter when the trees will have lost all their leaves. The visibility is considered to be limited, tempered by the quality of the design which would be complementary to the historic buildings, and is not considered to be harmful in the context of the conservation area.

341. The proposed development would not compromise proposed view 3 (the linear view of St Paul's Cathedral along Camberwell Road) in the draft NSP.
342. Policy 7.7 of the London Plan states that tall and large buildings should incorporate publically accessible areas on the upper floors, where appropriate. A number of responses to public consultation on the application raise concerns that no such areas would be provided. Whilst this is noted, the proposal includes a number of tall buildings and this aspect of the policy seeks to secure public benefits within the body of tall and large buildings. Such a facility would require a separate and bespoke access for the public and would involve additional cores including associated control which is not appropriate within the residential towers and would in any event, be outweighed by the wider and substantial public benefits that flow from the development. The substantial public benefits of this proposal would be accessible from the ground and would include the new underground station and the publicly accessible upper levels of the shopping centre itself which would offer elevated views across the city, and elevated facilities for visitors to the area.
343. Officers do not consider that the visibility of the scheme causes any harm given its high quality urban and architectural design.

Comments of the Design Review Panel (DRP)

344. The scheme was reviewed by the Southwark DRP on two occasions, in September 2015 and again in May 2016. At their final presentation to the Panel, the Panel concluded that they generally endorsed many aspects of the proposal and welcomed the involvement of Allies and Morrison on these two important sites. At the time the Panel retained concerns about the scale and design of the court at the centre of the east site, the permeability across the shopping centre site, the visibility of the transport hubs (the Underground and the railway station), and the height of the proposed tower on Oswin Street (W1).

Density

345. The central location of the site and its high public transport accessibility level (PTAL) of 6b is such that table 3.2 of the London Plan would support a development density of approximately 1,100 habitable rooms per hectare (hrh). Policy 3.4 of the London Plan and guidance within the Mayor's Housing SPG acknowledges that within opportunity areas large sites may determine their own character in terms of residential density, and may exceed ranges within the London Plan density matrix where it is justified by exceptional design quality.
346. With regard to Southwark policy, strategic policy 5 of the Core Strategy expects residential developments in the central activities zone to fall within the range of 650-1,100 habitable rooms per hectare. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes, and requires areas of non-residential space to be divided by 27.5 to create an equivalent number of habitable rooms per hectare. Neighbouring residents have raised concerns that the proposal would represent a significant over-development of the site.
347. Based on the Southwark Plan methodology for mixed-use developments, the density of the proposed development would equate to 1,512 habitable rooms per hectare, in excess of the London Plan range (it would equate to 1,761 hrh on the east site and 1,221 hrh on the west site). The council's Residential Design Standards SPD also

requires accommodation to be of an exemplary standard where density ranges would be exceeded, although there is a need to optimise the use of land. The proposal would result in a good standard of accommodation, although not all aspects of the housing could be described as 'exemplary' – this is assessed further later in the report in the quality of accommodation section. It is considered that the proposal would be of an appropriate height and set with an acceptable amount of public realm. Although there would be adverse impacts upon daylight and sunlight to neighbouring properties, this must be weighed in the balance with all of the benefits arising from the scheme. When all of the benefits and disbenefits are taken into account, it is not considered that exceeding the density threshold would warrant withholding permission in this instance.

Affordable housing

348. The **NPPE** requires local Planning Authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community and to set policies for meeting this need on site. Whilst it does not identify specifically Discount Market Rent within its definition of Affordable Housing it does include "other low cost homes for ... intermediate rent".
349. **London Plan** policy 3.8 sets out the requirement for developments to ensure a genuine choice of homes that are affordable and to meet the requirements for different sizes and types of dwellings. In particular it states that boroughs should ensure that positive and practical support to sustain the contribution of the Private Rented Sector (PRS) is provided in addressing housing needs and increasing housing delivery. Further it identifies the provision of affordable family housing as a strategic priority in LDF policies
350. LP policy 3.9 seeks to ensure the promotion of mixed communities balanced by tenure and household income, and LP policy 3.10 defines affordable housing by reference to Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. The supporting text states that "Increased provision of intermediate housing is one of the ways in which the supply of affordable housing can be expanded". The 2017 Draft New London Plan(H13) recognises Build to Rent as a means to provide affordable housing allowing for Discount Market Rent to be considered in this way, with a declared preference for London Living Rent levels. LP policy 3.12 sets out the requirement to secure the maximum reasonable amount of affordable housing having regard to a number of key factors and that policy also refers to the need to take account of development viability amongst other matters.
351. The proposal is primarily for a built to rent development within the private rented sector (PRS), albeit with traditional social rented units and a fall-back option to deliver conventional build to sell units on the west site; these latter two elements are changes to the applicant's proposal since the scheme was presented to the Planning Committee on 16 January 2018. The affordable housing proposal is described in detail below.
352. The **Mayor's Affordable Housing and Viability SPG** provides specific guidance on Build to Rent developments recognising that they differ from the traditional build for sale model. It supports Discount Market Rent (DMR) as the affordable housing offer with a preference for such homes to be let at London Living Rent levels which are set annually by the GLA and are intended to be affordable to people with incomes of up to £60,000. However any affordable housing must include provisions to remain affordable in perpetuity.

353. The guidance includes a requirement for covenant and clawback arrangements if PRS homes are sold out of the Build to Rent sector within a minimum of 15 years. A covenant is required to ensure that the benefit of the private rented homes are secured for a minimum period. The clawback is required to ensure there is no financial incentive to break the covenant. The Mayor's Housing Strategy seeks to increase the number of homes built as well as ensuring the provision of genuinely affordable housing. The Strategy supports the provision of intermediate rented homes.
354. **Core Strategy** SP6 requires that affordable housing is provided on all residential developments (of 10 units or more). This should be in the form of social rented and intermediate housing. Developments should provide as much affordable housing as is financially viable. Developments with 10 or more units should provide a minimum of 35% affordable housing. Within the Elephant and Castle Opportunity Area the affordable housing provision should be on the basis of 50% intermediate and 50% as social rented.
355. It is anticipated that the Core Strategy will be superseded by the **New Southwark Plan** (NSP) in mid 2019. The draft submission version has been approved by Cabinet and council assembly following the consultation period concluded earlier this year. The Examination in Public is likely to be scheduled for early 2019.
356. The draft NSP proposes a new policy (P4) in relation to PRS which amongst other matters will require a minimum of 35% homes to be affordable with three categories of rentals:

	% total housing	% total affordable housing
Social rent equivalent	12%	34%
Affordable rent capped at London Living Rent equivalent	18%	52%
Affordable rent for household incomes between £60,k - £90kpa	5%	14%

357. This policy is a material consideration although currently it has limited weight. The policy is being introduced in recognition of the contribution PRS can make towards meeting the housing needs of residents who cannot afford to or do not want to buy private homes in Southwark. This sector has the potential to provide high quality professionally managed accommodation which gives a greater level of security for tenants with minimum 3 years tenancies.

The Elephant and Castle SPD (2012)

358. The requirement for new developments to provide a minimum of 35% affordable homes is re-stated within this document. Affordable housing is noted as comprising social Rented, Intermediate and Affordable rented housing.
359. Intermediate Housing is defined as housing at prices and rents above those of social rented but below private housing prices or rents. It can include part buy/part rent, key worker housing and intermediate rent housing.

Affordable Housing proposal

360. Alongside a new shopping centre, a new education campus and other uses the redevelopment of the shopping centre and LCC site proposes a number of residential towers and blocks which provide a total of 979 residential units. The development as proposed would be primarily PRS (Private rented sector) also known as a Build to Rent product but with traditional social rented units provided on the west site as opposed to the previous offer which was for social rent equivalent units as envisaged in draft policy P4. The table below sets out the applicant's proposed affordable housing offer, set out against the requirements of the current adopted policy in the Core Strategy and those of the emerging policy in the draft NSP. The proposal is for 35% affordable housing based on habitable rooms.

Overall affordable housing offer (east and west sites combined)

361.

	Proposal (units)	% of AH in hab rooms	SP6 requirement	P4 requirement
Social rent	116	38%	50%	34%
London Living Rent	53	14%	50% for LLR/DMR combined	52%
Discount Market Rent	161	47.0%		14%
TOTAL	330	99%	100%	100%

362. OR

	Social rent	London Living Rent	Discount Market Rent	Total
East site				
1b	0	18	35	53
2b	0	23	89	112
3b	0	0	0	0
West site				
1b	22	2	10	34
2b	66	10	27	103
3b	28	0	0	28
Total units	116	53	161	
% of AH in hab rooms	38%	14%	47%	99%
SP6 require ment	50%	50% for LLR and DMR combined		
P4 require ment	34%	52%	14%	100%

363. *Whilst the proposal would comply with the policy requirement to provide a minimum of 35% affordable housing by habitable room, the above demonstrates that it would not comply with the adopted core strategy policy which requires the affordable housing to be a 50/50 split between social rented and intermediate units. It would also not*

comply with emerging policy P4 because, whilst the social rented units would just exceed the minimum requirement, there would be too much Discount Market Rent and too little London Living Rent.

364. *The affordable housing proposed would also not be evenly distributed across both sites, with the social rented units all being delivered on the west site. The s106 agreement would therefore stipulate that if the development on the west site has not substantially commenced within 10 years of the east site commencing, the land and sum of money sufficient for construction and completion of the social rented units would be transferred to the council, to deliver the social rented units.*

Fall-back position

365. *The applicant also wishes to retain a fall-back position whereby the west site could be delivered as traditional build-to-sell units. The exception to this would be the social rented units in the mansion blocks which would be delivered in any event. The developer would notify the council, of the intention to develop the west site as build to sell, and the affordable housing requirement for this would be for 50% social rented and 50% intermediate. Some of the west site's social rented units would already be secured in the mansion blocks, albeit 38% rather than the 50% requirement, therefore a review mechanism would be required.*
366. The proposal is to provide 35% affordable housing based on habitable rooms but amounting to 330 units (165 on each of the east and west sites). On the east site this would be provided as London Living Rent: 25% and Discount Market Rent (DMR): 75%. On the west site provision would be: Social Rent 45%, LLR 33% and DMR 22%. The Social Rented units would be operated by a Registered Provider or the council with standard Social rented terms. This represents a reduction of 12 in the overall number of units compared to the previous proposal i.e. 342 units down to 330.
367. All affordable housing would be provided 'in perpetuity' as confirmed in the Affordable Housing Statement addendum July 2017.
368. Core Strategy SP6 did not envisage PRS as a form of housing and consequently it does not address affordable housing requirements for this type of housing tenure. The proposal therefore in this respect does not accord with this part of the adopted development plan in Southwark. The NSP will address this specifically in draft policy P4. However, this emerging policy has limited weight given the current state of the plan process, The development plan includes the London Plan which advocates some flexibility in approach to ensure the maximum reasonable affordable housing.
369. The Mayor's Affordable Housing and Viability SPG explicitly recognises that discount market rent (DMR) is an appropriate affordable housing tenure to be provided in PRS developments. The Mayor considers the rent level on DMR should 'preferably' be pegged to London Living Rent (which is intended to be affordable to households with an income up to £60,000). The Mayor's household income threshold for affordable housing spans incomes up to a maximum of £90,000. However, the 2016/17 Annual Monitoring Review (AMR) states households with incomes between £60,000 and £90,000 should have their affordable housing needs met through intermediate for sale housing (i.e. shared ownership and discount market sale). The costs, including service charges for all intermediate rented products (including London Living Rent, Discounted Market Rent, Affordable Private Rent and Intermediate Rent) should be affordable to households on incomes of £60,000 or less. Officers recognise the emerging policy P4 is not consistent with the Mayor's position on intermediate rent.

370. The proposal as amended meets the policy requirement of 35%.
371. In contrast to the original submission the revised proposal includes the provision of traditional Social Rented housing – 116 units which would be located on the west site within 3 Mansion blocks. This amounts to 38 % of the affordable which set against policy SP6 is below the required 50%. In relation to the east site the rental levels do not conform to the distribution requirement set out in emerging policy P4. The proposal reflects GLA grant funding, recently confirmed, which has facilitated an increase in the number of social rented units from 74 to 116.
372. The revised tenure split on the west site substantially meets the policy requirements set out in SP6 as social rented accommodation is now provided. However on the east site the distribution of rental levels does not conform to either emerging policy P4 or the Mayor's preference for a majority of rents at London Living rent levels but not in excess i.e. not in the £60,000-£90,000 household income bracket.
373. The social rented units would be transferred to an RSL or the council whereas the ownership and management of the DMR (incl LLR) affordable housing would be retained by the applicant's shareholders, as long term investors.
374. The proposal is for the affordable housing to be distributed equally, in numerical terms, across both the east (first phase) and west (second phase) parts of the application site i.e. the existing shopping centre site and the LCC site respectively. On the east site the LLR affordable units (41) would be provided in two towers on the southern 'block' E3. The remaining DMR affordable units would be provided across each of the 3 towers providing a total of 161 units. These would be a mix of one and two bedroom flats.
375. Within the second phase, west site, a total of 165 units would be provided. These units would be located in the mansion blocks on Oswin Street – where the units would be social rented and also in one of the towers where the units would be a mix of London Living Rent and Discounted Market Rent. The mix includes 34x1 bed, 103x2 bed and 28x3 bed units.
376. The overall provision of affordable housing would be as follows:

Unit Type	Units	Unit Mix
1 bed	87 (98)	26.3% (29%)
2 bed	215 (217)	65.1% (63%)
3 bed	28 (27)	8.4% (8%)

() = previous proposal

377. The units would be tenure blind and the facilities provided, e.g amenity space, childrens' play space, refuse, cycle storage etc will be equally available to all residents.

Rents and Income Thresholds

378. Previously there was a range of rental levels proposed, 7 in total, linked to household incomes, in bands of £10,000, up to £90,000 (GLA income threshold). Broadly speaking jointly Bands B,C & D equate to London Living Rent. As revised the units are proposed as LLR – income bands B & C and DMR which would be income band G

(£80,000 - £90,000). In effect, as a result of the provision of 74 social rented units, the proposal now makes no provision for DMR to households in income bands between £50,000 + £80,000.

Household Income Bands

379.

	A Social rent equiv	B LLR	C LLR	D rent	E	F	G
Low	-	-	-	£50,001	£60,001	£70,001	£80,001
Mid	-	£30,000	£40,000	£55,000	£65,000	£75,000	£85,000
High	-	-	-	£60,000	£70,000	£80,000	£90,000
Units	116 (33)	33 (53)	20 (53)	0 (33)	0 (59)	0 (52)	161(59)
AH% units	35% (10%)	10% (15%)	6% (15%)	0% (10%)	0% (17%)	0% (15%)	49% (17%)
Hab room	38%	9%	5%	0%	0%	0%	47%
P4 req	34%	B+C+D	(LLR)	52%	E +	F+G	14%

() – previous proposal

380. Within the Elephant and Castle Opportunity Area the policy requirement as set out in Core Strategy SP6 is for a tenure split of 50:50 between social rented and intermediate. The rental distribution set out above does not accord with this stipulation.
381. As a DMR product it is possible to compare the proposed tenure in terms of rent levels but the tenancies are not comparable as many of the terms vary. The tenancies are based on three year leases which can be renewed. These are assured shorthold tenancies but with more favourable terms than the minimum requirement where there is no right to renew or requirement for a lease longer than 12 months.
382. *The social rent units now proposed on the west site within the mansion blocks would have standard SR tenancies as the units would be managed by either the council or an RSL.*
383. Although the DMR units would be comparable to other affordable units in terms of rent levels the nature of the tenancies is somewhat different. All the DMR tenancies will be based on 3 year leases which can be renewed and with a tenant only break. One other key distinction proposed is that eligibility based on income would be reviewed on renewal of leases (other than for the social rented equivalent units). Whilst this is different to tenancy terms with affordable housing providers it does provide the benefit of ensuring more turnover and availability within this tenure. It will also assist the application of any clawback to increase number of units in the lower rental bands (see below).
384. The rents themselves would be inclusive of service charges. Indicative typical rents for the scheme have been identified as follows:

	Social Rent	London Living Rent	DMR
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West	A	B	C	D	E	F	G
1 bed	£ 155	£ 258	£ 258				£ 522
2 bed	£ 182	£ 287	£ 287				£ 539
3 bed	£ 216	£ 316	£ 316				£ 539
East							
1 bed		£ 208	£ 208				£ 407
2 bed		£ 231	£ 231				£ 526
3 bed		£ 254	£ 254				£ 539

385. Acknowledging the limited weight to be applied to emerging policy P4 and in the absence of an adopted policy (in the Core Strategy) that addresses PRS and DMR as a means of Housing and Affordable housing provision, nonetheless it is worth considering the proposal against these emerging tenure split requirements. As drafted, in relation to affordable provision requirements of a minimum 35%, the policy seeks a breakdown of 34% Social rent equivalent; 52% London Living Rent equivalent and 14% GLA income levels.
386. *The application as revised now proposes 52.8% of the affordable habitable rooms to be at rents consistent with or below the LLR. The majority of that accommodation would be at social rent levels.*
387. Hence overall the breakdown of the affordable component would be:
- 38% social rent
14% LLR and
48% at 80% market rent for household incomes between £80,000 - £90,000 (reflecting the upper limit of the Mayor's income threshold for intermediate housing.)
388. This fails to meet the requirements of the emerging policy tenure split requirements. The applicant has sought to ensure that a minimum of 35% policy compliant affordable is provided but for viability reasons it is submitted that the tenure split as proposed by emerging policy P4 cannot be met. The applicant states that adhering to the proposed P4 tenure split would result in a reduction in the overall quantum of affordable housing based on viability.
389. The above analysis therefore indicates that, subject to consideration of viability, there would be a material conflict with the development plan in respect of the form and mix of the affordable housing offer. *However, it is of note that the main improvement that arises from the revised proposal is the provision of social rented accommodation to be operated by the council or a RSL. The tenure split breakdown is also out of step with the expectations in the emerging policy.*

Viability

390. Before reaching an overall assessment of the affordable housing offer against the development plan policy expectations and other material considerations in emerging policy, it is necessary to consider viability.
391. A Financial Viability Appraisal (FVA) was submitted by the applicant to support this position and the council engaged its own experts to scrutinise and assess the submitted FVA. As part of that exercise and following extensive discussions and negotiations an agreed position has been reached and a revised FVA submitted. On the basis of the revised FVA the conclusion is that the applicant's Affordable Housing proposal, as set out above, is the maximum amount of affordable housing that is

financially viable.

392. Extensive discussions have taken place in order to arrive at an agreed position in relation to the financial viability of the scheme. Much of this has centred on matters relating to the Internal Rate of Return (IRR) the comparable expression of profit level for a Build to Rent development as opposed to build for sale. Other issues which have been the subject of discussion have been the valuation of the shopping centre itself and construction costs to name but two.
393. The council's valuation experts have advised that the applicant's offer of 36% affordable housing (DMR) could be achieved with a fully compliant tenure mix but predicated upon an initial IRR of 6.50%, which, *through rental growth and cost management* over the construction period, would be in the order of 10 to 12 % upon practical completion.
394. The applicant's approach is to base the offer on an initial IRR of 7.15% (applicant's view of current rate vs 6.5% advised above) which will allow for 36% affordable housing but with a tenure mix that has just 50% in the lowest 4 income bands. To increase this affordability to 86% in these income bands, in accordance with emerging policy P4, the IRR would need to increase over time to 10 -12%. The applicant's position is for this predicted uplift to be secured by a clawback review mechanism in the S106 agreement. Such a review mechanism would need to be both sophisticated and robust to maximise the level of affordable units, in the lower rental bands, that is both reasonable and viable.
395. The Applicant has conceded that 7.15% initial IRR plus annual growth to 11.00% over the construction period is acceptable. All current forecasts suggest that this growth in IRR over the construction period is achievable and possibly conservative. Based upon current market data the advice is that there appears to be no reason why this approach could not deliver a fully compliant scheme. This is based on predicted growth rates and because it is predicted rather than actual the applicant therefore wishes to rely on the review mechanism due to the risk involved where the affordable housing would be based on a predicted IRR.
396. The essential difference concerns the burden of risk. A policy compliant scheme is not viable at an IRR of 6.50 - 7.00 % whereas it is at 11.00 %.
397. It is clear that the development plan expectations for affordable housing need to take account of viability. The maximum reasonable amount of affordable housing is assessed taking account of viability.
398. Officers are satisfied in the light of the viability testing outlined above that the Applicant's affordable housing offer (coupled with the securing of an appropriate review mechanism – see below) represents the maximum reasonable affordable housing provision taking account of the need for the council to apply its affordable housing requirements with some appropriate flexibility in accordance with the Mayor's emphasis in the London Plan to ensure that the scheme as a whole is deliverable. In respect of the revised offer, the council's experts are reviewing the increased social rented provision and the reconfiguration of rents. Officers are seeking their confirmation that it produces the same outturn as the previous mix and whether they remain of the view that it also represents the maximum reasonable quantum of affordable housing.
399. The full financial viability appraisal that supports the offer, together with the executive

summary, is published in full prior to the determination of the application by Planning Committee.

Covenant

400. The emerging policy P4 requires that the housing be secured for the rental market for a minimum 30 year term. This is a longer term to secure than the Mayor's 15 year minimum. Sale of any private rented homes from the PRS within this 30 year period would trigger a clawback mechanism resulting in a penalty charge towards affordable housing. The objective of this penalty is as set out in the Mayor's SPG noted above.
401. The objective of the covenant which is to ensure the borough benefits from the high quality PRS stock for a minimum period and to discourage investors without a genuine long-term commitment to the private rental market would still be met in that event. The revised offer confirms a 30 year covenant.

Viability review

402. In view of the fact that the affordable housing provides a compliant quantum of 35% but has a non-compliant tenure split, and in line with the council's Development Viability SPD, a viability review (VR) would be required. This is to ensure that if the economic circumstances of the scheme change in the future an improved tenure split can be achieved in order to be more closely if not fully compliant with policy. The detailed requirements for the viability reviews will be secured within the S106 legal agreement.
403. *As with any development of this nature a viability review will be triggered in the event that development has not substantially commenced within 36 months of the grant of planning permission. This is 12 months longer than the norm to allow for the extended clearance and preparatory works that a scheme of this scale entails. In these circumstances 36 months is considered to be justified. There will be a post implementation review for each site to be undertaken at 75% occupancy. Any uplift, at 50% to the council, would be applied to adjust rental levels downwards towards meeting the distribution set out in emerging policy P4.*
404. *In the event that the West site is delivered as open market for sale the review will need to take into account the policy requirement for a different tenure split of 50:50 social rented and intermediate. In addition it should be noted that regardless of whether the west site comes forward as build for sale, or if for any reason the development stalled and ultimately failed to proceed, the applicant has confirmed that the social rented units will be delivered. This will be secured with the legal agreement.*
405. The council's Development Viability SPD suggests that the apportionment of any uplift would be based on a 50:50 split. Any uplift above the agreed IRR of 11% as set out in the final FVA would be applied to increase the percentage of affordable units at the social rent equivalent and London Living rent equivalent units with the aim of getting closer to a policy compliant level.
406. The DMR/LLR units will be filled from a new Intermediate housing list which is currently being consulted on but should be in place well in advance of the completion of the first phase which is 3 – 5 years away.

OBJECTIONS

407. A number of objections have been received in respect of the provision of PRS/ DMR as affordable housing suggesting that there is an unproven need for this form of housing. The council recognises that there is support for an institutional private rented sector (BtR – Build to rent) at the national, regional and local level. The Government's White Paper *Fixing Our Broken Housing Market* (2017) made a clear commitment to support the growth of the B2R sector. The adopted London Plan (2016) and Affordable Housing and Viability SPG (2017) both state clear support for the BtR sector. Southwark Council's Housing Strategy (2015) and emerging New Southwark Plan both encourage and support the institutional private rented landlords where this provides better standards. Linked to this is an acknowledgement that the proportion of households which rent privately has grown considerably over the last couple of decades. The support for the institutional private rented sector is to drive up standards in the private rented sector and to allow more choice to private renters. The council only supports BtR schemes where clear benefits for renters such as longer tenancies than the statutory minimum are offered.
408. A further benefit of supporting BtR is that it will contribute additional homes towards Southwark's housing supply. Southwark has a housing target of 2,736 homes per year. Despite granting enough planning permissions, the average number of homes completed is closer to 1,500 homes per year.
409. As private rents and house prices inflation have outpaced wage growth, the number and proportion of households in need of affordable intermediate housing has grown. This has resulted in the local household income eligibility criteria for intermediate housing in London to qualify households with household incomes up to £90,000.
410. The South East London Borough Strategic Housing Market Assessment (2014) makes a clear case for the need for more intermediate tenure homes. Due to high house prices on the open market the intermediate "gap" between social rented and open market prices is very wide in Southwark. This is particularly the case for three- and four bedroomed dwellings. The report found net annual affordable housing need is assessed at close to 800 units per annum. More than half of the requirement for affordable housing is estimated to be for the intermediate segment (57%). This clearly supports the position that DMR meets an affordable housing need in Southwark.
411. The objection further argues that the affordable housing element of the proposed scheme does not meet the Core Strategy requirement because it does not provide conventional social rent homes as required by the Core Strategy. The revised proposal now specifically provides 116 social rented units.
412. The representation further argues that the proposal does not meet the affordable housing requirement for BtR schemes as set out in the New Southwark Plan. This is dealt with above and whilst it is correct that the proposal does not meet the DMR affordable housing requirement in terms of distribution of discounts, it does provide 36% affordable housing overall. The proposed distribution of discounts has been adjusted to account for the viability of the scheme and, as revised, has now included traditional social rented accommodation to a greater level than the previously proposed social rented equivalent units. The affordable housing requirements set through local plans are, as required by the NPPF, subject to viability. Any grant of planning permission would be subject to a viability review that would seek to improve the affordable housing offer to reflect any improvement in scheme viability.
413. The representation argues that the eligibility requirement for affordable housing is inequitable because it restricts access to 'economically active' households. The now

proposed social rented units will be available to those on the housing list on the same terms as any other council or any other council or Housing Association social rented accommodation. The DMR homes with shallower discounts are intermediate households intended to meet the needs of households who fall into the 'gap' between social housing and market housing. Eligibility will be determined in accordance with Southwark's Intermediate Housing List. There is a requirement for households to be 'economically active' in order to ensure they are able to afford the rent. This principle applies to other types of intermediate housing including shared ownership.

414. The representation argues that the difference in rental levels within the DMR element based on tenants' incomes is inequitable. Access to DMR homes provided at social rent equivalent will not be means-tested. Access to the less heavily discounted homes will be. This improves the viability of the scheme, thereby enabling a greater overall proportion of affordable homes to be provided. It also ensures that suitable affordable homes can be provided for households on a range of incomes which cannot afford full market value and may not access social rent or social rent equivalent housing.

Conclusion on affordable housing

415. The proposal is for a new form of affordable housing which has not previously been provided in Southwark. However it is a form of affordable provision which is being recognised as making a useful contribution to addressing housing need. Notwithstanding the extent to which the affordable housing provision is contrary to some elements of the development plan notably the Core Strategy, officers are satisfied that the provision, as revised, is the maximum reasonable and that it is in overall conformity with the development plan taking account of scheme viability.

Mix of dwellings

416. Policy 3.8 of the London Plan 'Housing choice' requires new developments to offer a range of housing choices in terms of the mix, housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these. Strategic policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% of the units with two or more bedrooms, at least 10% of the units with three or more bedrooms within the opportunity area, and no more than 5% studio units which can only be for private housing. The proposal would deliver the following mix of units:

417.

Mix	Units	%
Studio	16	1.6
1-bed	316	32.3
2-bed	528	53.9
3-bed	117	12
4-bed	2	0.2
Total	979	100

418. The proposed development would be policy compliant in terms of its unit mix, with 1.6% studio units, 66% 2+ bed units and 12% 3+ bed units.
419. Both parts of the site would also be policy compliant in terms of its mix; the east site would comprise 2.5% studios, 61.3% 2+bed units and 13.1% 3+bed units, and the west site would comprise 0.8% studio units, 70.6% 2+ bed units and 11.2% 3+ bed units.

Wheelchair accessible Housing

420. Policy 3.8 of the London Plan 'Housing choice' requires ninety percent of new housing to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings', and ten per cent of new housing to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. Designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
421. The proposed development would comply with the London Plan requirement, and a condition to secure this is recommended. Each site would also be policy compliant in respect of wheelchair accessible and adaptable housing.

Quality of accommodation

422. Policy 3.5 of the London Plan requires housing developments to be of the highest quality internally, externally, and in relation to their context and to the wider environment. They should enhance the quality of local places, incorporate requirements for accessibility and adaptability, and minimum space standards. In terms of Southwark policy, saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. The council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels and the units should be dual aspect to allow for good levels of light, outlook and cross-ventilation.

Privacy

423. The council's Residential Design Standards SPD recommends a minimum of 21m distance between the rear elevation of properties and 12m distance between properties that face one another, including across a highway.

East site

424. There would be acceptable levels of privacy, with 12m between towers 1 and 2 and 20m between towers 2 and 3. The towers would face each other across Park Route and a communal garden.

West site

425. The relationships between the proposed residential blocks on the west site would be closer, the closest of which being 8m between tower W1 and the proposed mansion block. A combination of bedrooms and living spaces would face each other across what would become a new street, and the separation distance would be below the SPD recommendation. As such a condition is recommended requiring details of obscure glazing or another device to maintain light levels and privacy to be submitted for approval. There would be 11m between towers W1 and W2 and between residential windows facing each other across Pastor Street, only just below the recommended 12m which is considered to be acceptable. There would be 18m between towers W2 and W3, which would face each other across a communal garden.

Aspect

East site

426. The majority of units (60.3%) on the east site would be dual aspect, comprising 70.5% dual aspect units to tower 1, 54.4% to tower 2 and 50.7% to tower 3. The single-aspect units would predominantly face south and west, and none would be north-facing. It is noted that within towers 2 and Tower 3 some units have been identified as single aspect, which would have a dual aspect room.

West site

427. Again the majority of units (80.6%) on the west site would be dual aspect, comprising 96% dual aspect for tower W1, 95% for towers W2 and W3, and 67.2% for the mansion block. None of the single-aspect units would be north-facing.

Unit sizes

428. East Site

Units	Overall unit size sqm	SPD minimum sqm	Amenity space sqm	SPD minimum sqm
1-bed	50 – 69.7	50	0 – 4.4	10
2-bed	69.8 - 106	61-70	0 – 4.4	10
3-bed	100.4 – 115.5	74-95	4.4	10

429. West Site

Units	Overall unit size sqm	SPD minimum sqm	Amenity space sqm	SPD minimum sqm
1-bed	50 – 70.6	50	0 – 36.6	10
2-bed	63.9 – 87.1	61-70	0 – 22.8	10
3-bed	87.5 – 110	74-95	5 - 38.8	10
4-bed	133.2	90-117	7.7	10

430. All of the units would comply with the minimum floor areas set out in the Residential Design Standards SPD, including for storage space. There would also be a number of internal communal spaces to serve the proposed units, which could potentially be used as lounges, shared kitchens or fitness centres.

Internal light levels

431. A Daylight Assessment based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. For APSH the BRE guidance notes that the main requirement for sunlight is in livingrooms, and recommends that they receive at least 25% of the total annual total, 5% of which should be received during the winter months. Given that the results would improve higher up the buildings, only the lower floors (approximately a third of each building) have been tested.

East site

432. Of the windows tested, 81.6% on the east site would comply. Those which would not meet the recommended level would be open plan living spaces with ADFs ranging from 0.74% to 1.98%.

West site

433. 63.3% of the windows tested would pass in relation to ADF. Those which would not would be open plan living spaces with ADFs ranging from 0.41% to 1.95% and bedrooms ranging from 0.2% to 0.93%.

Annual Probable Sunlight Hours

East site

434. Of the windows tested, 34% would comply with the guidance in relation to APSH and 67% for the winter hours. Of those which would not comply this would be caused by shading from the balconies and from surrounding buildings. There would be no rooms which would not receive any sunlight.

West site

435. Of the windows tested, 72% would comply with the guidance in relation to APSH and 76% for the winter hours. Of those which would not comply there would be seven livingrooms which would not receive any sunlight, owing to the rooms being served by deep balconies and their window positions relative to one of the neighbouring proposed buildings.
436. Given the highly urbanised location of the site and the number of units proposed it is recognised that not all units would comply with the BRE guidance. However, these would be a limited number on the lower floors and some would be affected by balconies to the units.

Amenity space

437. Section 3 of the Residential Design Standards SPD sets out the council's amenity space requirements for residential developments and states that all flat developments must meet the following minimum standards and seek to exceed these where possible:

50sqm communal amenity space per development;

For units containing three or more bedrooms, 10sqm of private amenity space;

For units containing two or less bedrooms, 10sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement;

Balconies, terraces and roof gardens must be a minimum of 3sqm to count towards private amenity space.

East site

438. The majority of the units would have access to private amenity space in the form of balconies, although the 3-bed units would only have 4.4sqm of amenity space and 10sqm is required, and 16 units would have no private amenity space at all. The overall shortfall in private amenity space across this part of the site would be

454.7sqm which would be made up for in the communal provision, with 4,506sqm proposed for this part of the site which is described in the Trees and Landscaping section of this report.

West site

439. Again, the majority of the units would have private amenity space in the form of balconies, terrace and private gardens to the mansion block units fronting Oswin Street. It is noted that 17 of the 3+bed units would have less than 10sqm of private amenity space, ranging from 5sqm-9.9sqm, and 20 units would have no private amenity space at all. The shortfall in private amenity space would be 386.4sqm on this part of the site which would be made up for through the communal provision in accordance with the approach set out in the Residential Design Standards SPD; there would be 1,640sqm of communal amenity space for this part of the site.

Childrens' playspace

East site

440. All of the children's playspace requirements for the east site would be met on-site, in accordance with guidance in the GLA's Informal Play and Recreation SPG. A condition requiring details of the play equipment to be submitted for approval is recommended, which would need to be provided prior to the occupation of the dwellings.

West site

441. There would be a shortfall of 780 sqm of children's playspace on the west site, therefore in accordance with the council's Planning Obligations and CIL SPD a contribution of £117,780 would be required, and this has been included in the draft s106 agreement. *The contribution amount has increased to reflect the increased number of social rented units now proposed.*

Units per core

442. The London Housing Design Guide advises that there should be no more than 8 units per core, with two lifts per core from seventh floor level upwards.

East site

443. Tower 1 would have a maximum of 9 units per core, although it would be served by three lifts and the interlocking square footprint which would form the tower means that there would be no long corridors. Towers 2 and 3 would have a maximum of 8 units per core, both served by two lifts.

West Site

444. Towers W1 and W2 would have a maximum of 6 units per core, served by two lifts; tower W3 would have a maximum of 6 units per core, served by 3 lifts. The mansion block would have a maximum of 8 units per core served by two lifts.

Internal noise levels and vibration

445. Chapter 9 of the ES considers noise and vibration. It has two strands, the first of which

considers the suitability of the site for residential and educational uses which is relevant to the quality of the proposed accommodation. The second strand is an assessment of the likely significant noise and vibration effects which would arise from the proposed development, and this is considered separately below.

446. With regard to *noise levels*, British Standard and World Health Organisation guidelines have been used to determine appropriate noise levels within the residential units, and best practice guidance has been used in relation to the proposed new LCC building. Baseline noise levels were established through surveys conducted in 2014, 2015 and 2016, and the latter took into account the effects of the reconfigured road layout. The survey data does not take into account an increase in train frequency from the overground station. The ES advises that this is because the change in rail movements is not yet known, and that in the long term a change in noise levels of less than 3dB would be imperceptible, which would equate to a doubling in the number of train movements. The survey methodology was agreed with the council's Environmental Protection Team (EPT) as part of the EIA scoping process, and the results show that the site is dominated by road traffic noise, with some rail noise on the east site.

East site internal noise levels

447. The ES advises that maximum acceptable noise levels would be exceeded on the facades of towers E1, E2 and E3 during both the day and night except for the rail façade of tower 3 which would fall within acceptable limits overnight. In light of this the ES advises that a mechanical ventilation system should be employed which would remove the need for residents to open their windows other than for purge ventilation. This would ensure that noise within the flats should fall within acceptable limits and EPT has recommended a condition to secure this which forms part of the draft recommendation – it is possible that the first five floors would need their windows fixed, but further modelling would confirm this. If the windows to the units were open, the recommended noise levels within the flats would be exceeded. A glazing specification has been provided, although this would likely change as the scheme progresses, and further testing has also been carried out in relation to noise from Corsica Studios which is considered separately below. The ES advises that if a mechanical ventilation strategy were also implemented for the new LCC building, noise levels to the teaching areas would fall within acceptable limits.
448. A condition is also recommended limiting noise from plant associated with the proposed development, which could impact upon both existing neighbouring occupiers and future occupiers of the development. A condition for good levels of sound proofing between residential and non-residential uses within the proposed development would be required, to prevent any undue noise and disturbance.

Potential noise from Corsica Studios

449. Corsica Studios is divided into two spaces, a live music area and bar, and a second, smaller studio next door, and there is an external smoking area at the rear of approximately 45sqm. Hours of operation are understood to be Sunday to Thursday 8pm to 3am and Friday and Saturday 8pm to 6am, and a review of its listings reveals that it holds events most nights of the week. The proposed development would introduce a large number of new residential units as close as 10m from the rear of Corsica Studios, and noise from the venue could cause noise and disturbance to the occupiers of the new flats. This in turn could result in noise complaints against the venue, harming its long term operation which would not be acceptable.

450. This issue is recognised in paragraph 123 of the NPPF which advises that planning policies and decisions should aim to recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established. This is reinforced by policy 7.15b of the London Plan which advises that development proposals should seek to manage noise by mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses. Further guidance is contained in the Mayor's Central Activities Zone SPG and the Culture and the Night Time Economy SPG. The latter document introduces the 'Agent of Change' concept which is the principle that the person or business responsible for the change is responsible for managing the impact of the change. This means that a residential development to be built near a live music venue, for example, would have to pay for soundproofing, while a live music venue opening in a residential area would be responsible for the costs. Responsibility for noise management is therefore placed on the 'agent of the change'.
451. The surveys undertaken to establish existing noise levels at the site including a location close to Corsica Studios. However, Corsica Studios has raised concerns that noisier events may have been taking place at other times which the surveying would not have picked up on. As such a further period of monitoring was agreed between the applicant and Corsica Studios to ensure that the most noisy events i.e. the worst case scenario, were captured. Additional surveying was undertaken in March and again in November this year to pick up its noisiest events, and given that higher noise levels have been recorded it is now proposed to address this issue by way of high performance glazing to the proposed flats together with sound-proofing works to Corsica Studios. Internal noise levels within the flats would be secured by way of a condition, and the applicant has agreed to a contribution of £125k to pay for a scheme of soundproofing to Corsica Studios, which would be secured through the s106 agreement.

East site external amenity areas noise levels

452. Noise to external spaces within the development has also been considered, including the areas of public realm and communal residential gardens. The ES predicts that some of the external communal gardens including part of the garden between towers E2 and E3 facing Walworth Road would experience noise levels slightly in excess of the recommended guidance, even with mitigation through solid balustrades and planting for example. Whilst this is noted, the site is located at a transport hub in the heart of a busy town centre and in close proximity to a railway line and busy roads it is therefore unsurprising that noise levels are high. It is also noted that future residents could use the new public park being delivered to the east of the site which is further away from the hustle and bustle of the transport hub. Noise levels within The Court have been tested and it is predicted that they would fall within acceptable levels, largely owing to the shielding which would be afforded by the new buildings which would surround it.

East site vibration and structure borne noise

453. A site wide vibration report has been submitted which forms part of the ES. Potential sources of vibration include the elevated railway line and railway station, and the Northern and Bakerloo underground lines.

454. The ES predicts that although levels of tactile vibration would be low, there may be the potential for structure-borne noise to rise above acceptable levels. Physical vibration control measures have therefore been incorporated into the structural design of the east site development and with these in place, potential effects from London Underground lines and overground rail vibration would be imperceptible by future residents of the proposed development.

West site internal noise levels

455. The ES predicts that noise levels on the tower facades facing the major roads would exceed acceptable levels. Again, this could be mitigated through a mechanical ventilation strategy, details of which should be secured by way of a condition. The proposed cultural venue would need to be adequately sound-proofed which again, could be secured by way of a condition.

West site external amenity areas noise levels

456. The ES predicts that with no mitigation in place, some of the private balconies and communal terraces facing major transport noise sources would experience noise in excess of recommended levels. It advises that recessive balconies and solid balustrades around these areas which are shown on the plans should bring noise to within acceptable limits and again, the town centre location of the site at a busy transport hub is noted.

West site vibration and structure borne noise

457. The ES predicts that this would be insignificant and that the site would provide a suitable level of residential amenity with regard to vibration.

Secure by Design

458. A condition is recommended requiring the proposed development to achieve secure by design certification. This would help to ensure that the safety and security objectives of policy 7.3 of the London Plan and saved policy 3.14 of the Southwark Plan would be met.

Air quality to the proposed development (both sites)

459. With the exception of plot W3 where it would face Oswin Street, all of the residential units within the proposed development would be located above ground floor level, away from the heavily trafficked roads. However, the ES advises that the first five floors of the residential units in all of the buildings would nonetheless need to be mechanically ventilated for air quality purposes. EPT has recommended a condition requiring further monitoring to be undertaken to establish whether the first five floors is the appropriate level, and this forms part of the draft recommendation.
460. The new LCC building would be both mechanically and naturally ventilated, and the other commercial uses within the proposed development would be fitted with louvres for mechanical ventilation.
461. The impact of the proposed heating equipment (combined heat and power – CHP) for the development on air quality has been taken into account. EPT has recommended a pre-commencement condition requiring details of the chimney stack heights and dispersal model for the CHP plant to be submitted for approval, and this forms part of

the draft recommendation.

Conclusion to quality of accommodation

462. As set out above there would be a number of instances where the quality of accommodation would not comply with guidance, including for amenity space and privacy distances on the west site. However, overall and subject to conditions it is considered that the proposal would provide a good standard of accommodation, and would comply with the provisions of the development plan in this regard.

Trees and landscaping

463. Policy 7.5 of the London Plan 'Public realm' advises that London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Policy 15 of the Elephant and Castle SPD sets out the way in which the public realm in the opportunity area should be improved, including ensuring that it is generously landscaped, inclusive, well lit, uses high quality and durable materials and street furniture, reduces micro-climate impacts, and incorporates and supports biodiversity. The SPD notes the poor quality public realm that currently exists at the east site, although this has recently been much improved by the Peninsula.
464. Concerns have been raised in response to consultation on the application that the proposal fails to adequately consider green space. A neighbouring resident has requested that granite setts are identified in the Elliott's Row Conservation Area Appraisal and should be used on Oswin Street, together with other improvements to the street.
465. An Arboricultural Impact Assessment (AIA) has been submitted with the application, and landscaping for the proposed development is set out in chapter 6 of the Design and Access Statement. Concerns have been raised that the proposal does not adequately consider or provide green space within the proposed development.

Trees

466. Across both parts of the site there are currently 27 individual trees and one group comprising seven trees. These have been categorised and there are 3 category A (high value), 12 category B (moderate value), 9 category C (low value) and 4 category U trees (unsuitable for retention). The AIA advises that 20 trees would need to be removed in order to facilitate the proposed development, resulting in a loss of 13.08 cubic metres. However, officers have since agreed with the applicant that one additional tree on the west site would be retained.

East site trees

467. There are 11 trees on the east site comprising one category A, 4 category B, 2 category C and 4 category U trees. They are around the southern and western edges of the site and the proposal would require the removal of 3 category B, 2 category C and 4 category U trees.
468. 27 new trees would be planted in the east site public realm, most of which would be street trees focussed along Elephant and Castle, some trees along Walworth Road and New Kent Road, and two feature trees within The Court. The new trees along

Elephant and Castle would help to soften the public realm and provide screening and shelter from the road.

West site trees

469. There are currently 17 individual trees on the west site comprising 2 category A, 8 category B and 7 category C trees, together with the group of seven trees which is categorised as C; these are located along St George's Road, Oswin Street and Brook Drive. The submission advises that 2 category B, 3 category C and the group of category C trees would need to be removed in order to facilitate the proposed development. However, it is considered that tree T13, a category B Beech which is located on the north-eastern side of the west site opposite the Faraday Memorial could be retained, and a condition to secure this is recommended.
470. 17 new trees would be planted in the public realm on the west site predominantly along Elephant and Castle and St George's Road, with a group of new trees at the northern end of Pastor Street to frame the entrance to this street. Two large existing London Planes on Oswin Street would be incorporated into two pocket gardens which would be created along this street (there would be three pocket parks in total). The proposed buildings would be set sufficiently far back not to compromise the retained trees, and a condition is recommended to ensure that they would be adequately protected during construction. It is recommended that clauses be included in the s106 agreement to secure the new tree planting, together with provisions for a financial contribution in the event that not all of the proposed trees can be planted following site investigations.
471. Whilst it is recognised that there would be some loss of existing trees as a result of the proposal including 4 category B trees, the most valuable would be retained, with no category A trees requiring removal. 10 additional trees would be planted in the public realm across both sites, together with 94 new trees the communal gardens on the east site and 81 on the west site, resulting in a significant increase in the number of trees on the site. They would add welcome greenery to the highly urbanised environment and would mitigate the loss of stem girth which is welcomed. It is recommended that all of the public realm tree planting be secured through the s106 agreement, and tree planting and landscaping to the communal amenity areas by way of a planning condition.

Landscaping

472. Public realm on both parts of the site is limited at present, particularly on the east site. Changes have been made in the wider area in recent years, including the removal of the southern roundabout and subways, reconfiguration of the northern roundabout, and the creation of the Peninsula. A new public square has been delivered to the east of the shopping centre beyond the railway arches, which connects with the recently opened first phase of Elephant Park. The proposed development on the east site would be well connected to these new public spaces.
473. The east site is a transport hub for tubes, trains and busses, and the new LCC building would be a destination for students. There would be large numbers of people moving through the site on a daily basis, therefore the public realm would need to be durable, and an attractive place both for moving through and congregating in. The height of the proposed buildings around The Court is such that this space would not comply with the BRE guidance regarding sun on the ground, although it would be less shaded during the summer months and would nonetheless be an attractive space. On the west site a

mews character is proposed for Oswin Street, including three pocket gardens and private gardens to the duplex units in the Mansion Block which would front the street. Pastor Street would be a shared space, but would predominantly be for pedestrians and cyclists.

474. The outline landscaping proposals submitted with the application are considered to be of a high standard, including the use of materials such as York stone paving and natural stone. The new streets would be well-lit and lined with active frontages, helping them to feel safe and secure. A number of amendments are required however, to ensure that the landscaping would create a coherent public realm across the town centre and that it would take into account the future, permanent design of the Peninsula. There is considered to be scope for further greening of the internal streets, improvements to the planting palette and the provision of green walls, and these could be secured through the s106 agreement.

East site communal gardens

475. These would be on podiums for plots E2 and E3 and would be landscaped to form a variety of different spaces. The gardens for plot E2 would be split into different character zones including areas of tree planting, lawn and play areas, and BBQ terrace. The gardens for plot E3 would be more formal in character, and would include an outdoor gym, formal garden and sensory garden. The gardens for the two plots would be connected by a footbridge allowing residents to use both, and they would comply with the BRE guidance in relation to sun on the ground.

West site communal gardens

476. Communal gardens for tower W1 would be a terrace at level 15 which would wrap around the north-eastern corner of the building facing Oswin Street and St George's Road. Plot W2 would have a T-shaped communal garden at first floor level which would sit above the internal service yard and retail units and would be enclosed by the back of the cultural venue which would incorporate a green wall. It would serve towers W2 and W3 and would be landscaped to include a lawn and play area, groups of trees, terraces and seating areas. Both towers within this plot would also have terraces, tower W2 at 18th floor level facing the Peninsula and Pastor Street and tower W3 at 27th floor level facing the Peninsula and Newington Butts. Communal amenity space for plot W3 would be located at 5th floor level in a series of interconnected terraces. This space would be predominantly lawn, with paving and seating along the eastern side closest to Pastor Street. The west site communal gardens would comply with the BRE guidance in relation to sun on the ground.

Conclusion to trees and landscaping

477. A total of 20 trees would need to be removed in order to facilitate the proposed development, taking into account the tree shown for removal but which could actually be retained. Of these trees, none would be category A and only 5 would be category B. This tree loss would be more than compensated for by significant new tree planting, both in the public realm and within the communal gardens. New areas of high quality of public realm would be created, and overall it is considered that the proposal would comply with the provisions of the development plan in this respect.

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

478. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding 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 permission will not be granted for development where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
479. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.
480. Concerns have been raised by neighbouring residents and local groups that the level of residential accommodation proposed would lead to significant overcrowding in the area and an unacceptable impact upon local services. These matters are considered in the transport and community infrastructure levy sections of this report.

Impact of the proposed uses

East site

481. The proposed development on this part of the site would comprise a new shopping centre, leisure uses, a new building for the LCC, a new station box for the Northern Line ticket hall and significant new residential accommodation. The most significant change compared to the existing uses would be the new LCC building, and a significant quantum of residential accommodation.
482. Given its busy, town centre location it is not considered that the introduction of a new educational facility on the east site would result in any significant loss of amenity to neighbouring occupiers. There are already large numbers of students using this part of the site to access the existing LCC building on the west site. Student activity would transfer from the west site to the east site, and although their numbers would increase, it is considered that this would be satisfactorily absorbed into this town centre site and transport hub, in accordance with saved policy 5.1 of the Southwark Plan.
483. It is not also considered that the introduction of residential accommodation onto the east site would result in any significant loss of amenity to neighbouring occupiers. Residential is a town centre use and it would sit comfortably alongside the other uses in the vicinity. The one potential exception to this is Corsica Studios and the potential for noise complaints against the venue from future occupiers. This has been considered in the quality of accommodation section of this report.

West site

484. Concerns have been raised by neighbouring residents regarding noise and disturbance from the proposed cultural venue and from people using the pocket parks which would be provided along Oswin Street.

485. Again, given the town centre location with a broad range of uses and high levels of activity, it is not considered that the proposed uses on the west site would result in any significant loss of amenity to neighbouring occupiers. The proposed cultural venue would be positioned fronting Elephant and Castle and St Georges Road, away from the quieter residential streets to the west. It would nonetheless need to be adequately sound-proofed in order to contain amplified sound, and patrons would need to be managed when entering and leaving the premises; a sound-proofing condition is included in the draft recommendation, and a visitor management plan could be secured through the s106 agreement. *These measures would be sufficient to ensure no significant loss of amenity in the event that the leisure space on the west site were used either fully or in part to provide a bingo hall.*
486. The uses sitting opposite the houses on Oswin Street would predominately be residential units within plot W3, and the pocket parks would be modest in size (approximately 32sqm each) and are unlikely to be used late into the evening. Plot W1 which would be located on the northern part of Oswin Street would contain a small retail unit at ground floor level which would be serviced from Oswin Street.
487. The Metropolitan Tabernacle church has a congregation of approximately 1,000 people spread across various services, including a 300-strong Sunday school. A representation submitted by the Tabernacle advises that whilst congregations enter the building from the front (Elephant and Castle), its day-to-day entrance is from the side / rear closest to Pastor Street and facing proposed plot W2. Safety concerns have been raised regarding the proximity of proposed tower W3 to the Tabernacle, and that objects have fallen from balconies and roof terraces at One the Elephant which has damaged vehicles and causes a danger to pedestrians. The objection notes that tower W3 would be closer to the Tabernacle than One the Elephant, heightening this concern and notes that adults and children use the side entrance during the week. Concerns raised by the Tabernacle relating to wind microclimate, flooding and drainage are considered in the relevant sections of this report.
488. In response to the concern regarding balconies and a roof terrace, it is recommended that the detailed drawings condition be required to include safety features for those balconies which would face the Tabernacle. This could include higher balustrades, for the top of the balustrades to be curved rather than flat to prevent people putting objects on them, and for screening to the roof terrace.

Impact of the proposed buildings

Privacy and overlooking

489. Concerns have been raised by neighbouring residents that the proposed development would result in an unacceptable loss of privacy to neighbouring dwellings. Concerns have also been raised regarding loss of a view and impact upon property values, but these are not material planning considerations and cannot be taken into account.
490. As stated, in order to maintain privacy the council's Residential Design Standards SPD recommends a minimum separation distance of 12m between the fronts of buildings and any buildings which front a highway, and a minimum of 21m at the rear.

East site

Metro Central Heights

491. This predominantly residential complex is located directly opposite the east site on the northern side of New Kent Road. There are three blocks directly opposite the east site and the separation distances between these blocks and the closest development on the east site would be 42m, 37m and 31m, all well in excess of the SPD minimums. As such there would be no unacceptable loss of privacy to these dwellings. There would be a terrace on top of the LCC building and given the town centre location of the site with high existing background noise levels it is not considered that the terrace would result in any undue noise or disturbance.

Albert Barnes House

492. This part 4, part 6-storey building is located further east along New Kent Road, also on the northern side and contains a retail unit on the ground floor and flats above. The new LCC building would be located approximately 39m from this building and as such no loss of privacy would occur.

Railway Arches

493. There are no residential uses within the railway arches or other uses which are considered sensitive in relation to privacy.

Elephant One

494. This new building contains retail units and a gymnasium at ground and first floor levels, with three towers of 15, 18 and 23-storeys above containing residential and student accommodation. The new LCC building would be located 55m from this neighbouring building and as such would not result in any loss of privacy.

Strata

495. This 43 storey building is located to the south of the site on Walworth Road and contains commercial space on the ground floor and flats above. There would be a separation distance of 30m between Strata and tower 3 within plot E3, and approximately 35m between Strata and the communal gardens which would sit between towers E2 and E3. This would exceed the minimum distances set out in the Residential Design Standards SPD and given the separation distance and town centre location, it is not considered that any undue noise or disturbance would occur as a result of the communal gardens.
496. There is a 5-storey building next to Strata which contains commercial space on the ground floor and residential above. There would be a minimum separation distance of 54m between this building and proposed tower E2 and the communal gardens, well in excess of the SPD minimum standards.

Draper House

497. This 25-storey building is located to the south of the east site and contains retail space at ground floor level and flats above. There would be a minimum distance of 67m between Draper House and tower E2 and the communal gardens, well in excess of the SPD minimums.

West site

One the Elephant

498. This recently completed 37-storey building contains commercial space on the ground and first floor and flats above. There would be a separation distance of 47m between this building and windows at the rear of proposed plot W3. There would be a separation distance of 74m between this building and tower 3 within plot W2, well in excess of the SPD minimum standards.

Metropolitan Tabernacle

499. There is a flat at the rear of this building which is understood to be occupied by staff, and which has habitable room windows which would face proposed plot W3. The separation distance would be approximately 15m to windows and terraces at the rear of the mansion block, in excess of the SPD minimum where properties face each other across a street.

Oswin Street

500. There would be a separation distance of 15m between plot W1 and the Metropolis Building which is a 4-storey building at the northern end of Oswin Street which is in residential use. There would be a minimum separation distance of 19m between windows within plot W3 and the terraced houses and flats along the remainder of Oswin Street, which would exceed the SPD minimum standard.
501. *Concerns have been raised by a neighbouring resident that the proposal would create a direct route from Elephant and Castle to Oswin Street, between plots W1 (the northern-most tower) and W3 (the mansion blocks). The concerns relate to a potential for loss of privacy, loss of security, and increased noise and disturbance. Whilst it is noted that there would be a new route, it is not considered that this would result in any significant loss of privacy or security to the Oswin Street dwellings. Oswin Street is already a public street down which people can walk, and the main route through the west site is likely to be the extended Pastor Street, which would contain retail and commercial space. Additional daytime and nighttime sound testing has been undertaken, and this demonstrates that the impact of opening up this route would increase noise levels on Oswin Street by less than a decibel which would be imperceptible.*

21 St George's Road

502. This building appears to be in commercial use. In any event the separation distance between it and tower W1 would be approximately 15m, in excess of the SPD guidance. The proposed single-storey retail pavilion to the north of tower W1 would be a similar distance from this building.

Perronet House

503. This 11-storey building contains garages, a pharmacy and a doctors' surgery at ground floor level and flats above. The flats face east and west and have views towards the Peninsula and St George's Road. There would be a separation distance of approximately 30m between this neighbouring building and tower W1, well in excess of the SPD minimum standard.
504. All of the other surrounding buildings are further away from the site and as such would not experience any loss of privacy or overlooking as a result of the proposal.

505. *Physical impact upon surrounding businesses* (impact upon businesses within the red line is considered in full in the equality implications section of this report)

East Site

Corsica Studios

506. The proposed development would result a reduction in the size of a smoking area at the rear of this premises, which is also sometimes used as a cloakroom. The area immediately beyond the smoking area would become a new public route leading from Walworth Road to The Court. There are no standards in relation to the size of smoking areas, therefore this impact would need to be managed, to limit the number of people using the smaller area.

Railway arch 113 Elephant Road

507. This unit sits between the entrance to the railway station and the existing access to the shopping centre car park. It has been subdivided and the southern is occupied by Ria, a money transfer business, and the northern part by Faktory, a Columbian restaurant; planning permission for the restaurant use was granted in February 2015 (reference: 14-AP-3954). The restaurant does not sit within the red line for the planning application, but it has a smoking area on the western side of the viaduct which does sit within the site. This smoking area would be lost as a result of the proposal and the area turned into new public realm next to the opened up entrance to the railway station; no access from the existing restaurant onto this new area of public realm is shown on the plans. The proposal would therefore impact upon the arrangements of the restaurant, but given the significant benefits which would arise from the proposal, this would not warrant withholding planning permission.

West site

Castle Leisure Centre

508. It is not considered that the proposed development would impact upon the continued operation of the leisure centre. Servicing implications are considered in the transport issues section of this report.

Daylight, sunlight and overshadowing

Daylight

509. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
510. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within an area of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This area of Elephant and Castle has been identified as an area where tall buildings are appropriate, and there are existing buildings with heights of 43 storeys (Strata), 37 storeys (One the Elephant), 44 storeys (360 Tower), 25 storeys (Draper House), up to 23-storeys over a podium (Elephant One – described as

Tribeca Square in the daylight and sunlight report) and 9, 12 and 18-storeys (Metro Central Heights) within close proximity to the site.

511. The BRE sets out three detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight (VSC) can be reduced by about 20% of the original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows:

Reduction in VSC	Level of impact
0-20%	Insignificant
20-29.99%	Minor adverse
30-39.99%	Moderate adverse
40% +	Substantial adverse

512. This is supplemented by the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.
513. In considering the impact upon sunlight, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. The BRE guidelines require that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than a 20% loss of its former value.
514. The ES considers the impact on the following neighbouring buildings:

Cheam House
 Perronet House
 Brook Drive Nos. 171-193 (odd)
 Wardroper House, St George's Road
 One the Elephant
 Metro Central Heights (Public House)
 Alexander Fleming House (see note below re: address)
 Strata
 Draper House
 Elliott's Row Nos. 30-56 (inclusive), 58 and 61-68 (inclusive)
 St Georges Road Nos. 21, 35 and 58-60 (even)
 Gaywood Street Nos. 27-35 (odd)
 Princess Street Nos. 7-19 (odd)
 Oswin Street Nos. 1, 3-5 (inclusive) and 7-41 (odd)
 Hayles Building Nos. 1-84
 Metro Central Heights Nos 1-413
 Dante Road Nos. 2 and 6-10 (even)
 Walworth Road Nos. 80-92 (even)

Arch Street Nos. 26 and 28
 Tribeca Square West Tower (Elephant One)
 Tribeca Square South Tower (Elephant One)

515. The daylight report has considers a large number of rooms around the site. It assessed 6220 residential windows serving 4092 rooms. Of the 6220 windows assessed, 4751 (76%) would satisfy the BRE recommended levels for VSC.
516. Of the 4092 rooms assessed, 3667 (90%) would meet the BRE standards for NSL. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is set out below:
517. Existing baseline V. Proposed Vertical Sky Component and cumulative ()

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 30% reduction in VSC	No. with moderate adverse impact of between 30%-40% reduction in VSC	No. with substantial adverse impact of over 40% reduction in VSC
Cheam House	22	22 (22)	0 (0)	0 (0)	0 (0)
2 Dante Road	24	24 (24)	0 (0)	0 (0)	0 (0)
Perronet House	270	237 (195)	12 (38)	11 (21)	10 (16)
Brook Drive Nos. 171-193 (odd)	82	77 (77)	3 (3)	2 (2)	0 (0)
Wardroper House	15	15 (15)	0 (0)	0 (0)	0 (0)
One the Elephant	923	669 (649)	132 (128)	70 (77)	52 (69)
Metro Central Heights (Public House)	65	31 (24)	0 (4)	23 (23)	11 (14)
Alexander Fleming House	154	73 (67)	39 (36)	25 (27)	17 (24)
Strata	761	652 (562)	33 (40)	37 (100)	39 (59)
Draper House	574	571 (451)	2 (63)	0 (33)	1 (27)
Elliott's Row Nos. 30-56 (inclusive), 58 and 61-68 (inclusive)	267	263 (263)	4 (4)	0 (0)	0 (0)
St Georges Road Nos. 21, 35 and 58-60 (even)	66	61 (61)	5 (1)	0 (4)	0 (0)
Gaywood Street Nos. 27-35 (odd)	37	37 (37)	0 (0)	0 (0)	0 (0)
Princess Street Nos. 7-19 (odd)	49	49 (33)	0 (11)	0 (5)	0 (0)
Oswin Street Nos. 1, 3-5 (inclusive) and 7-41 (odd)	325	15 (14)	27 (28)	100 (97)	183 (186)
Hayles Building Nos. 1-84	300	39 (37)	46 (37)	29 (39)	186 (187)
Metro Central Heights Nos 1-413	1109	970 (781)	72 (112)	28 (122)	39 (94)
Dante Road Nos. 6-10 (even)	90	90 (14)	0 (10)	0 (14)	0 (52)
Walworth Road Nos. 80-92 (even)	113	111 (34)	0 (2)	2 (2)	0 (75)
Arch Street Nos. 26 and 28	172	102 (96)	54 (36)	3 (22)	13 (18)
Tribeca Square West Tower	551	470 (414)	34 (71)	47 (66)	0 (0)
Tribeca Square South Tower	251	173 (14)	56 (81)	7 (34)	15 (22)

Total	6220	4751 (3984)	519 (705)	384 (688)	566 (843)
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518. Existing baseline V. Proposed Daylight Distribution and cumulative ()

Property	No. of rooms tested	No. retaining at least 80% of their baseline NSL value	No. with minor adverse impact of up to 30% reduction in NSL	No. with moderate adverse impact of between 30%-40% reduction in NSL	No. with substantial adverse impact of over 40% reduction in NSL
Cheam House	22	22 (22)	0 (0)	0 (0)	0 (0)
2 Dante Road	16	16 (16)	0 (0)	0 (0)	0 (0)
Perronet House	192	188 (186)	1 (0)	0 (1)	3 (5)
Brook Drive Nos. 171-193 (odd)	50	48 (48)	1 (1)	0	1 (1)
Wardroper House	15	15 (15)	0 (0)	0 (0)	0 (0)
One the Elephant	584	551 (535)	18 (27)	10 (9)	5 (13)
Metro Central Heights (Public House)	39	27 (26)	1 (0)	7 (9)	4 (4)
Alexander Fleming House	114	110 (107)	2 (4)	0 (0)	2 (3)
Strata	639	616 (609)	9 (12)	11 (13)	3 (5)
Draper House	381	381 (356)	0 (18)	0 (5)	0 (2)
Elliott's Row Nos. 30-56 (inclusive), 58 and 61-68 (inclusive)	131	126 (126)	2 (2)	3 (3)	0 (0)
St Georges Road Nos. 21, 35 and 58-60 (even)	49	46 (47)	3 (2)	0 (0)	0 (0)
Gaywood Street Nos. 27-35 (odd)	25	25 (25)	0 (0)	0 (0)	0 (0)
Princess Street Nos. 7-19 (odd)	35	35 (23)	0 (6)	0 (5)	0 (1)
Oswin Street Nos. 1, 3-5 (inclusive) and 7-41 (odd)	139	14 (14)	16 (16)	30 (30)	79 (79)
Hayles Building Nos. 1-84	271	170 (166)	45 (45)	33 (32)	23 (25)
Metro Central Heights Nos 1-413	492	473 (467)	3 (6)	1 (4)	15 (15)
Dante Road Nos. 6-10 (even)	86	86 (12)	0 (10)	0 (7)	0 (57)
Walworth Road Nos. 80-92 (even)	57	57 (33)	0 (0)	0 (3)	0 (21)
Arch Street Nos. 26 and 28	123	116 (106)	3 (11)	1 (2)	3 (4)
Tribeca Square West Tower	449	375 (375)	22 (22)	23 (22)	29 (30)
Tribeca Square South Tower	183	170 (167)	12 (14)	1 (1)	0 (1)
Total	4092	3667	138	120	167

Perronet House

519. This building is situated directly to the north and west of the proposed development and has principal room windows facing onto the Peninsula. As can be seen from the tables above there will be a considerable number of windows that would see a reduction in VSC, nonetheless, 237 (88%) of the 270 assessed windows would continue to meet the BRE guidelines.

520. The remaining 33 windows would lose more than 20% VSC with 12 experiencing a 20% - 30% reduction and 11 windows experiencing a 30-40% reduction. A total of 10 windows would experience a loss of VSC in excess of 40%. Whilst not all of the room uses have been confirmed, it is worth noting that 19 of the affected windows serve rooms in which there are additional windows which would continue to receive BRE compliant VSC levels. It is noted that there is a window that would experience a 100% loss in VSC, however this window has a very low VSC to begin with at 0.3% because it sits beneath a very deep overhang. The remaining losses are also from low existing VSC levels. As such the small real terms reduction in VSC generates a disproportionate percentage figure.
521. In terms of NSL, 188 (98%) of the 192 assessed rooms would satisfy the BRE criteria. One room would experience a 20% - 30% reduction whilst three would experience reductions in excess of 40%. The most affected rooms are at ground floor and whilst the room uses have not been confirmed, it is noted that the level of NSL loss is attributable to the urbanised location. Whilst it is acknowledged that there would be some significant impacts to the dwellings at Perronet House on VSC, the overall impact in terms of daylight taking into account the positive NSL results at 98% compliance is considered to be acceptable on balance, within this central London location.

Brook Drive

522. Brook Drive lies immediately to the west of the proposed development, running perpendicular to Newington Butts. The daylight and sunlight assessment has considered properties 171-193 Brook Drive (odd). A total of 82 windows across 50 rooms have been assessed on this street. In terms of VSC, 77 windows (94%) would be compliant with the BRE guidance. Three windows would have reductions of 20%-30%, however these windows serve rooms which also benefit from unaffected windows and as such there would be no significant impact. Two windows would have reductions of between 30%-40%, however these windows serve a bedroom which is less sensitive to daylight reductions than principal living accommodation and as such the impact is considered to be minor.
523. Of the 50 rooms assessed for NSL 48 (96%) would retain BRE compliant daylight distribution. One room would have a reduction of 20%-30% and one a reduction in excess of 40%. Overall the impact on the properties on Brook Drive is considered to be minor.

One the Elephant

524. The recently completed residential tower at One the Elephant sits immediately on Elephant and Castle, to the south of proposed plots W2 and W3 and to the west of plots E2 and E3. 923 windows have been assessed for VSC, with 72% of windows (669) retaining at least 80% of their previous value and as such complying with the BRE guidance. 132 windows would have minor reductions of between 20%-30% VSC, 70 would have moderate reductions of 30%-40% loss and 52 windows would have substantial adverse reductions of more than 40% loss of VSC. The majority of the affected windows are located at lower levels on the north and east facades.
525. In terms of NSL, 551 of the 584 rooms that were assessed would meet the requirements of the BRE guidelines. This equates to 94% of all rooms which is considered to balance out the impact upon VSC.

Metro Central Heights (Public House)

526. This particular block of the Metro Central Heights complex sits to the north of the site immediately adjacent to the gyratory and New Kent Road, and opposite proposed plots E1 and E2. 65 windows were assessed serving 39 rooms, of which 31 windows (48%) would comply with the BRE guidance on VSC and 27 rooms (69%) would comply with the criteria regarding daylight distribution.
527. 23 windows would experience a moderate loss of VSC of between 30%-40% and 11 would record a substantial adverse impact of more than a 40% reduction in VSC. Generally, those rooms that would experience a greater than 40% reduction in VSC already have low existing VSC levels and as such the real terms reduction in VSC is not as significant as the percentage figure would allude to. Notwithstanding this, it is considered that there would be a moderate adverse impact upon this block, with some windows and rooms experiencing substantial reductions.

Alexander Fleming House

528. This is the address given in the applicant's daylight and sunlight report but it is incorrect. The building actually forms part of and is a later addition to the Metro Central Heights complex and sits immediately to the west of the railway viaduct. It would be opposite the proposed LCC building and this would result in only a 47% compliance level in terms of VSC (73 out of 154 windows). Whilst this would be a moderate to substantial adverse impact, the VSC results should be considered against the positive daylight distribution levels that would ensure good levels of sky visibility in what is a dense urban environment, with 110 of the 114 rooms assessed for NSL complying with the BRE guidance which equates to a 96% compliance rate for NSL.

Strata

529. Strata sits close to the southern gyratory on Walworth Road and lies to the south of the proposed development, facing directly onto proposed block E3. 761 windows and 639 rooms were assessed for VSC and NSL respectively. In terms of VSC, 652 windows would comply with the BRE criteria, equating to 86% of all assessed windows. The remaining 109 windows would experience a 20%-30% reduction (33 windows) and a 30%-40% reduction (37 windows). A total of 39 windows would experience reductions in excess of 40%. Whilst this would indicate a minor to moderate adverse impact in terms of the criteria set out in the ES, it should be noted that 96% of rooms, 616 of the 639 assessed for NSL, would continue to have BRE compliant daylight distribution which is positive.

Draper House

530. Draper House lies to the south of the proposed development on Newington Butts. The impact on this building would be very minor, with 571 of the 574 windows assessed against the VSC criteria complying with the BRE guidance, equating to a 99% compliance rate. It should also be noted that all 380 rooms assessed for daylight distribution would meet the BRE criteria for NSL.

Elliott's Row

531. Elliott's Row lies to the west of the proposed development and would be most directly affected by proposed plot W3 (mansion block). The daylight and sunlight assessment has considered the impact of the development on numbers 30-56 (inclusive), 58 and

61-68 (inclusive). Overall there would be a very high level of compliance with the BRE in terms of VSC, with 263 of the 267 assessed windows retaining BRE compliant VSC which equates to a 98% compliance rate. Additionally, 126 of the 131 rooms assessed for daylight distribution would retain BRE compliant NSL, equating to a 96% compliance rate which is positive. The impact on the dwellings on Elliott's Row is considered to be minor.

St George's Road

532. The properties at numbers 21, 35 and 61-68 (inclusive) St Georges Road have been assessed. St George's Road sites to the north-west of the proposed development and 66 windows across 49 rooms have been assessed for VSC and NSL respectively. Compliance rates for both criteria would be high at 92% for VSC and 94% for NSL indicating that the impact on these dwellings would be minor in significance.

Oswin Street

533. Oswin Street lies immediately to the west of the proposed development and would face onto plot W3. Numbers 1, 3-5 (inclusive) and 7-41 (odd) have been assessed comprising 325 windows for VSC and 139 rooms for NSL.
534. The impact on these properties would be significant, with only 15 (5%) of the assessed windows retaining BRE compliant levels of VSC. A total of 27 windows would experience a loss of between 20%-30% and there would be 100 windows with losses ranging from 30%-40%. There would be a total of 183 windows with reductions in VSC in excess of 40% and this is broken down further as detailed below:

Reduction	No. of windows affected
40% - 50%	68
50% - 60%	62
60% - 70%	52
70% - 80%	1
80% - 90%	0
>90%	0

535. Whilst not all of the room uses have been confirmed, it is worth noting that 78 of the windows which would experience a loss of VSC in excess of 40% serve 46 rooms which have an additional windows which would experience a more moderate loss of VSC of below 40%.
536. The impact upon NSL would be equally significant, with 14 (11%) of the 139 assessed rooms complying with the BRE criteria. The remaining 125 rooms would experience losses of between 20%-30% (16 rooms) and 30%-40% (30 rooms). A total of 79 rooms would record losses in excess of 40% NSL.

Hayles Building

537. Numbers 1-84 Hayles Buildings are immediately to the west of the proposed development, behind the properties on Oswin Street. These properties would be most affected by the development of proposed plot W3. A total of 300 windows and 271 rooms have been assessed for VSC and NSL respectively. With regards to VSC, 39 windows would continue to receive BRE compliant daylight levels, equating to 13%. Losses of 20%-30% would be recorded at 46 windows, and 29 windows would

experience a loss of between 30% and 40%. 186 windows would be subject to losses exceeding 40% VSC and this is broken down further in the table below:

Reduction	No. of windows affected
40% - 50%	21
50% - 60%	57
60% - 70%	30
70% - 80%	38
80% - 90%	18
>90%	22

538. It should be noted that there are 19 windows which would experience a 100% loss of VSC, although these windows already have very low existing VSC levels (1.6 – 0.1 VSC) and as such the actual real terms loss in VSC would be minor. This would also generally be the case for the majority of units that would experience in excess of a 40% reduction in VSC in that they already have very low existing VSC levels and whilst the percentage reduction may seem excessive, the actual real terms VSC reduction would be less significant.
539. The impact upon NSL would be more positive, with 170 of the 271 assessed rooms retaining BRE compliant daylight distribution, equating to 63% of the assessed rooms. The remaining 101 rooms would experience losses of between 20%-30% (45 rooms) and 30%-40% (33 rooms). A total of 23 rooms would record losses in excess of 40% NSL.

Metro Central Heights (Former Alexander Fleming House)

540. This is located on the northern side of New Kent Road and occupies a large site. It would be most directly affected by proposed blocks E1 and E2.
541. 1,109 windows across 492 rooms have been assessed against the VSC and NSL criteria respectively. In terms of VSC, 970 rooms would continue to meet the BRE guidance working out at an 87% compliance rate. Whilst it is acknowledged that there would be 39 windows recording a loss of VSC in excess of 40%, this should be looked at in conjunction with the positive daylight distribution results which show that 473 of the 492 rooms would continue to meet the BRE guidance. The NSL compliance rate is 96% which is considered positive and indicates that the impact on the buildings at Metro Central heights would be minor in the context of the proposed development and the criteria set out in the ES.

Walworth Road

542. Numbers 80-92 Walworth Road (even) lie to the south of the proposed development. The impact upon this building would be very minor, with 111 of the 113 windows assessed against the VSC criteria complying with the BRE guidance, equating to a 98% compliance rate. It should also be noted that all 57 rooms assessed for daylight distribution would meet the BRE criteria for NSL.

Arch Street

543. The dwellings at 26 and 28 Arch Street lie to the north/north east of the proposed development on the other side of the railway viaduct on New Kent Road. These buildings would be close to the larger components of the proposed development which

would result in only a 59% compliance rate in terms of VSC (102 out of 172 windows). Whilst this would be a moderate to substantial adverse impact, the VSC results should be considered against the positive daylight distribution levels which would ensure good levels of sky visibility in what is a dense urban environment; 116 of the 123 rooms assessed for NSL would comply with the BRE guidance for NSL and this equates to a 94% compliance rate.

Tribeca Square West (Elephant One)

544. This is part of a new development that lies to the east of the site and is bound by Elephant Road and New Kent Road. 85% of the assessed windows would continue to meet the BRE guidelines for VSC and 83% of the rooms would meet BRE criteria for NSL. Whilst 34 of the assessed windows would record losses of between 20%-30%, this is considered to be a minor impact in the context of the ES. It should also be noted that the remaining 47 windows would experience losses of between 30%-40% and whilst this could be considered a moderate adverse impact, it is considered that they would retain a reasonable level of daylight given the highly urbanised location.

Tribeca Square South (Elephant One)

545. This is part of the same development as Tribeca Square West outlined above. 69% of the assessed windows would continue to meet the BRE guidelines for VSC. However, the daylight distribution results would be more positive, with 93% of the assessed rooms meeting BRE criteria for NSL indicating that the overall impact on this block would be minor adverse.

Metropolitan Tabernacle

546. The initial daylight and sunlight assessment omitted the residential accommodation to the rear of the Metropolitan Tabernacle; an addendum has therefore been submitted assessing the impact of the proposal on this accommodation. Six windows serving habitable accommodation have been tested for Vertical Sky Component (VSC); one would comply with the BRE guidance and five would experience losses in excess of 20%, ranging from 21.3% to 26%. These losses would be minor adverse, only marginally in excess of the BRE recommendations. The windows would experience improved No Sky Line (NSL) results ranging from a 1.5% improvement to a 37.3% improvement. Four windows tested in relation to sunlight would comply with the BRE guidance. Officers are therefore satisfied that the daylight and sunlight impact upon the flat within the Tabernacle would be acceptable.

Cumulative impacts

547. The cumulative impacts on all properties in terms of VSC and NSL are set out in the tables above and the applicant has considered these impacts as part of the Environmental Statement. Concerns have been raised by neighbouring residents that the daylight / sunlight / overshadowing assessments do not take account of the impact of the new 360 tower which is largely complete, but the impact of this building has been included in the cumulative assessments. The cumulative assessment results in an additional 945 windows out of 6220 assessed falling short of the BRE criteria. Overall the compliance rate on VSC and NSL in the cumulative scenario would be 64% and 85% respectively balanced against a compliance rate of 76% (VSC) and 90% (NSL) when considering the impact of the proposed scheme in isolation. Whilst impacts of both moderate and substantial harm have been identified in the cumulative scenario, these are largely attributable to the combination of various developments

taking place in the surrounding area as opposed to the proposed development itself.

Skipton House

548. In 2016 the council resolved to grant planning permission for a large mixed-use development on the site of Skipton House which is beyond the northern roundabout, behind the entrance to the Bakerloo Line station.
549. The Skipton House scheme has been included in the daylight and sunlight assessment as part of the massing of the cumulative schemes and their potential impact on the daylight and sunlight of surrounding dwellings. In terms of the impact of the proposed development on Skipton House, it should be noted that the dwellings which this development would contain have not been included in the overall assessment. This is largely a consequence of the distance of the proposed residential blocks in the Skipton House scheme from the proposed development site. Additionally, the residential part of the Skipton House development would sit behind a commercial element until level 14, at which point the residential units would have good access to daylight and sunlight. As such, it is not considered necessary to assess the VSC and NSL impacts of the proposed scheme on the Skipton House proposal.

Sunlight

550. In considering the impact upon sunlight to residential properties, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. The BRE guidelines advise that a window should receive a minimum of 25% of the annual probable sunlight hours, of which 5% should be received during winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than 20% of its former value (amended table below).

551.

Property	No. of windows	BRE compliant	Non-Compliant () = cumulative					
			Winter APSH			Total APSH		
			20-30% Loss	30-40% Loss	>40% Loss	20-30% Loss	30-40% Loss	>40% Loss
Perronet House	158	144 (144)	0 (0)	0 (0)	11 (11)	1 (1)	2 (2)	4 (4)
Brook Drive Nos. 171-177 (odd), 183, 189, 193.	45	45 (45)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Wardroper House	15	15 (15)	0 (0)	0 (0)	0 (0)	0(0)	0 (0)	0 (0)
One the Elephant	540	537 (537)	0 (0)	0 (0)	0 (0)	3 (3)	0(0)	0 (0)
Metro Central Heights (Public House)	61	52 (43)	0 (0)	0(0)	6 (15)	0 (0)	1 (0)	6 (7)

Alexander Fleming House	154	93 (85)	0 (0)	0 (0)	61 (69)	5 (5)	8 (8)	25 (25)
Strata	87	87 (87)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Draper House	294	294 (294)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Elliott's Row Nos. 30-56 (inclusive), 58 and 61-68 (inclusive)	308	308 (308)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
St Georges Road Nos. 35 and 58-60 (even)	43	43 (43)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Gaywood Street Nos. 27-35 (odd)	37	37 (37)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Princess Street Nos.7-19 (odd)	49	49 (48)	0 (0)	0 (0)	0 (0)	0 (1)	0 (0)	0 (0)
Oswin Street Nos.1, 3-5 (inclusive) and 7-41 (odd)	325	170 (85)	4 (4)	19 (19)	52 (52)	28 (28)	39 (39)	171 (198)
Hayles Building Nos. 1-84	296	184 184)	4 (4)	6 (6)	56 (56)	4 (4)	11 (11)	97 (97)
Metro Central Heights Nos. 1-413	998	858 (789)	0 (0)	0 (1)	134 (148)	27 (27)	24 (21)	9 (24)
Dante Road Nos. 6-8 (even)	8	8 (7)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (1)
Walworth Road Nos. 84, 88, 92	20	20 (14)	0 (0)	0 (0)	0 (5)	0 (0)	0 (0)	0 (6)
Arch Street Nos. 26 and 28	77	70 (46)	0	1	52 (29)	0 (4)	0 (1)	1 (1)
Tribeca	161	161 (161)	0 (0)	0 (0)	0 (0)	0(0)	0(0)	0 (0)

Square West Tower								
Tribeca Square South Tower	97	84 (72)	0 (0)	12 (0)	0 (17)	1 (6)	4 (2)	1 (12)
Total	3728	3128 (3048)	8 (8)	38 (26)	325 (402)	69 (80)	89 (84)	315 (349)

552. The properties at Hayles Buildings and the dwellings on Oswin Street would experience a substantial adverse impact in relation to sunlight, whilst Alexander Fleming House and Metro Central Heights (1-413) would experience a moderate adverse impact. All of the remaining properties surveyed would have a minor adverse impact in terms of sunlight. Those buildings experiencing a substantial adverse impact have been considered in more detail below:

Hayles Buildings

553. A total of 97 windows would experience a reduction in sunlight in excess of 40%, with 56 windows having at least a 40% reduction in winter sun. This is acknowledged as a substantial adverse impact, however it is the case that many of these windows already have low sunlight values which has resulted in a disproportionate percentage reduction in comparison to the real terms reduction in sunlight.

Oswin Street

554. 171 of the assessed windows would experience a reduction in sunlight beyond 40%, with 52 windows having at least a 40% reduction in their winter sun. As with Hayles Buildings, this is considered to be a substantial adverse impact and it results from the eastern orientation of these properties and their location close to plot W3.

Overshadowing

555. The BRE guidance advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21st March. If the area receiving 2 hours sunlight is reduced by more than 20% it is considered that the change may be noticeable. Three existing amenity areas have been assessed:

Area1: Amenity space located at the end of Elliott's Row on the junction with St Georges Road;

Area 2: Courtyard within Metro Central Heights; and

Area 3 : Amenity space on the corner of Meadow Row and New Kent Road.

556. The overshadowing assessment demonstrates that these spaces would comply with the BRE guidance. In terms of transient overshadowing within the area there would be a small amount of additional overshadowing caused by the proposed development on March 21st, although this additional overshadowing would not affect the surrounding sensitive amenity areas.
557. Additionally, on June 21st there would be an increase in overshadowing to St Mary's Churchyard to the south-west of the site between 6am and 7am, but for the remainder of the day there would be no increase in overshadowing.

558. In winter there would be an increase in overshadowing on the courtyard within the London South Bank University Technopark building (at lunchtime). For the remainder of the day, the sensitive amenity areas would be unaffected by overshadowing from the proposal and the overall effect of the development on overshadowing would be minor.
559. It should also be noted that impacts upon the rear gardens of the dwellings on Oswin Street would comply with the BRE guidance in terms of overshadowing. Only one garden on the northern end of the street would experience a reduction in sun on the ground, but this would be less than 20%. Additional studies have been submitted assessing shadow to west square, and there would be no increase in permanent shadow to the garden in the centre of the square, either in the proposed or cumulative conditions. The proposal would result in some transient overshadowing to the north-west corner of the square between 8 and 9am. However, the proposal would comply with the BRE guidance in relation to sun on the ground.

Conclusions on daylight, sunlight and overshadowing

560. For daylight and sunlight it is noted that there would be significant adverse impacts to the properties at Oswin Street, Hayles Buildings, and to a lesser extent, Metro Central Heights. The proposal would not result in any significant overshadowing effects.
561. The impacts upon daylight and sunlight must be weighed in the balance with the location and planning framework for the site, and the regeneration benefits which this major regeneration scheme would bring forward. The site sits within the Central Area as defined by the Elephant and Castle SPD which recognises the potential for this area to become a fantastic town centre, with a dynamic community and a range of uses as well as becoming an attractive Central London destination. The regeneration of the site would deliver significant increases in retail, residential and education floorspace, new leisure facilities and public transport improvements. As acknowledged by both the London Plan and the Elephant and Castle SPD, opportunity areas are considered to be appropriate for tall buildings, and they are considered to be both key to achieving the vision for Elephant and Castle (including the uplift in floorspace and new homes) and to signalling the regeneration of the area.
562. The adverse impacts on daylight and sunlight identified in the ES are unfortunate, however the proposed development is considered to be in line with the vision for the area and the tall buildings proportionate in scale for an urbanised central London location. In this case, the impacts on the dwellings identified are considered to be acceptable on balance, given the significant benefits which would arise from the redevelopment of the site and the long term regeneration objectives set out in the Elephant and Castle SPD.

Solar glare

563. The BRE guidance advises that glare or solar dazzle can occur when sunlight is reflected from a glazed facade. It advises that this can affect road users outside and the occupants of adjoining buildings, and that the problem can occur either when there are large areas of reflective glass or cladding on the façade, or when there are areas of glass or cladding which slope back so that high altitude sunlight can be reflected along the ground. As such, solar dazzle is only a long term problem for some heavily glazed (or mirror clad) buildings.
564. Chapter 15 of the ES considers the impact of solar glare on road junctions and

pedestrian crossings, and this is considered in the transport issues section of this report. The ES does not consider the impact upon adjoining buildings on the basis that the proposed building facades would not be fully, or even heavily glazed and the facades would be vertical as opposed to sloping, and no mirrored glazing is proposed. In light of the above officers are satisfied that it is unlikely that the proposal would cause instances of solar glare into neighbouring buildings. Moreover, there is no guidance on appropriate levels of solar glare that would be considered acceptable, and solar glare assessments focus on *areas* of reflection at viewpoints that are considered the highest safety risks which ultimately are on the nearby roads and train lines as there is potential for solar glare effects to impair the vision of road users and train drivers. Whilst it is possible for nearby residents to use blinds or avert their gaze from any solar reflections, road users cannot always choose to look away from the glare.

Light pollution

565. The ES advises that because the proposal does not include a large expanse of commercial office space, a light pollution assessment is not considered necessary.
566. The towers within the proposed development would contain residential accommodation, and the tower cores containing the lifts and stairs and which would more than likely be permanently lit, would be located in the centre of the towers. As such any light emanating from the building would be from the individual flats, and it is likely that most of them would be turned off overnight and that people would have blinds and curtains at their windows. There would be external lighting to the buildings and to the public realm and non-residential uses on the lower floors of the development. As such a condition for details is recommended, to ensure that they would not result in any unacceptable light pollution to neighbouring properties.
567. The exception to the above is the proposed LCC building which could result in some light spillage towards Metro Central Heights and new residential accommodation at Elephant One. In light of this a condition is recommended requiring details of any likely light pollution and potential mitigation (if required) to be submitted for approval.

Temporary demolition / construction impacts

568. Concerns have been raised by neighbouring residents regarding demolition and construction impacts, including noise and disturbance, impact upon air quality and construction traffic. The Metropolitan Tabernacle which adjoins the west site has raised concerns that recent works being carried out at the LCC building has affected the use of their multi-media editing suite, concerns about lack of access to their site during construction, and that the developer should be adequately insured to cover any potential vibration impacts to the Tabernacle (insurance is not a material planning consideration and cannot be taken into account).
569. Key principles outlined in the application documents in relation to the management of the demolition and construction process include the need to minimise disturbance to neighbouring residents, businesses and those using the area, to ensure continuity of access to the Northern Line, and to allow for the movement of the LCC from its existing home on the west site to the proposed new building on the east site.
570. Chapter 6 of the ES specifically relates to the development programme, demolition and construction, and includes details of the sequence in which the individual plots would be constructed on the east and west sites. The impacts of demolition and

construction are also considered in the relevant chapters of the ES, i.e. demolition and construction impacts upon transport, upon air quality, upon noise and vibration and so on. It is noted that the phasing / sequencing could change, and a condition is recommended requiring a phasing plan to be submitted for approval.

571. A construction management plan (CMP) has also been submitted with the application which sets out how it is intended that the demolition and construction process would be implemented and managed; it is based on a standard proforma which has been produced by the council to assist people in formulating CMPs. There are a number of concerns regarding the details which have been submitted to date, namely:

Construction hours need to be agreed;

The construction of plot W3 as the last plot on the west site (it is considered that this should be constructed first as the completed building would act as a screen during the construction of plots W1 and W2);

Potential noise levels and the need to ensure new residential accommodation coming online on the Heygate Estate is adequately protected.

572. The above issues have been raised with the applicant with a view to establish whether they could be addressed. The ES recommends that a detailed Construction Environmental Management Plan be prepared for each part of the site to mitigate some of the adverse impacts, and these should be secured through a s106 agreement. Maintaining access to neighbouring buildings including the Tabernacle could be secured as part of the CEMP, together with vibration monitoring and measures to reduce noise.
573. Concerns have been raised by the Metropolitan Tabernacle that a condition for a construction management plan has not been included in the draft recommendation. However, as set out above, it is recommended that this be secured through the s106 agreement given the complexity of the proposals.

Conclusion on impact upon the amenity of neighbouring occupiers and surrounding area

574. The impacts of the proposed uses, impacts upon privacy, overshadowing, solar glare and light pollution are all considered to comply with the provisions of the development plan and relevant supporting guidance insofar as amenity is concerned. Areas of non-conformity with the development plan comprise daylight and sunlight impacts, particularly to properties in Oswin Street, Hayles Buildings and Metro Central Heights, together with impacts upon Corisca Studios and the Faktory restaurant which would see their external smoking areas reduced in size and lost altogether. There would also be temporary adverse impacts during construction, although these would be reduced through demolition and construction management plans. However, when weighed in the balance with the significant regeneration benefits which would arise from the proposal, it is not considered that these adverse impacts would warrant a refusal of planning permission in this instance, and that the benefits would outweigh the localised harm caused.

Noise and vibration

575. Noise and vibration is considered in chapter 9 of the ES, which considers impacts from demolition and construction activities, construction traffic, plant noise and servicing activities.

Demolition and construction

576. The ES predicts that demolition and construction work would increase noise levels and potentially cause vibration within and immediately adjacent to the site. This could have a temporary, short-term impacts upon neighbouring residents, particularly along Oswin Street, the northern part of which is a route proposed for construction vehicles. The ES also considers that some parts of the site could be occupied whilst others are being constructed. It advises that the implementation of noise and vibration control and management measures within a construction management plan would reduce this, such as the use of modern and quiet plant and machinery, the erection of hoardings around the site, setting noise and vibration limits and the use of construction techniques to minimise vibration. A construction management plan has been submitted in support of the application, but it is not sufficiently detailed at this stage and there are concerns regarding the use of Oswin Street by construction vehicles owing to potential noise and disturbance to dwellings along this street. A full construction management plan for each of the sites should therefore be secured through the s106 agreement. With mitigation in place the ES predicts that the impact of noise arising from construction and demolition activities would be insignificant to local, temporary, adverse and of moderate significance.
577. The ES identifies that vibration could occur during construction activities, which could impact upon the existing underground lines. It concludes that with mitigation measures in place including through a construction environmental management plan, vibration impacts during construction would be insignificant to local, temporary, adverse and of minor significance.
578. Further work has been undertaken to consider how demolishing the existing shopping centre would impact on how noise from Corsica Studios is experienced by neighbouring properties. This is set out in a Corsica Studios and Interim Construction Phase Technical Note. The shopping centre currently acts as a shield and removing it could result in neighbouring properties experiencing greater levels of noise from the venue, even though the noise levels themselves would not have increased. Strata and One the Elephant could potentially be affected in this way, and the technical note recommends that until the east site is completed a temporary acoustic screen should be erected at the rear of Corsica Studios. It advises that depending on the length of the interim construction period, other measures to further reduce break-out noise from Corsica Studios should be considered; a condition to secure this has been included in the draft recommendation.

Completed and operational development

579. The ES considers the impact of plant noise, noise from the various uses within the proposed development, servicing noise and road traffic noise and concludes that all of the impacts would be insignificant.
580. The cinema would need to be adequately sound-proofed so as not to cause any loss of amenity, including to the flats which would be located above it in plot E2. As stated in relation to quality of the proposed accommodation, plant noise from the proposed development and noise from the proposed cultural venue could be limited by way of a condition. This would protect both future occupiers of the proposed development and neighbouring residents from unacceptable levels of noise. Subject to this the ES advises that noise emanating from the proposed cultural venue would be insignificant provided the council's noise criteria are satisfied.

581. Servicing for the proposed development would largely be contained within the buildings on both parts of the site, and the ES advises that conditions on servicing hours could be imposed. Further details are set out below. The applicant has advised that servicing the shopping centre outside of peak hours would not result in noise issues because the impact upon the proposed residential accommodation has been considered and found to be acceptable, and the neighbouring accommodation would be further away.
582. Traffic noise from the completed development is predicted to be insignificant, which takes into account a reduction in vehicle trips compared with the existing situation owing to the reduction in car parking on the site.
583. Subject to the conditions and s106 obligations referred to above, the impact of the proposed development in terms of noise and vibration is considered to be acceptable.

Conclusion to noise and vibration

584. Subject to s106 obligations and conditions, it is concluded that the proposed development would comply with the development plan in relation to noise and vibration.

Transport issues

585. Elephant and Castle is a major transport node that accommodates a wide range of travel. The site has a public transport accessibility level (PTAL) of 6B (“excellent”), with access to the Northern and Bakerloo lines from within the east site. Elephant and Castle Railway Station adjoins the shopping centre to the east and can be accessed from Elephant Road or via a bridged access from the raised ground floor of the shopping centre. The railway station offers Thameslink services to north and south London and beyond, and is also used by South Eastern services.
586. The site is largely surrounded by major roads that form part of the Transport for London Road Network (TLRN), sits at the confluence of two tube stations and a rail station, is served by 29 bus routes and numerous designated cycle routes. The addition of a new shopping centre, university headquarters and almost 1,000 new homes, as well as the wider growth underway in the Opportunity Area, combine to present very challenging transport impacts, particularly for construction and servicing vehicle movements. The Transport Assessment anticipates that trip generation via all forms of travel will increase by around 4,000 daily trips on completion and this demands careful management and mitigation. These issues are most acute for the East Site, which, as a result of its boundary with the railway viaduct and the TLRN is effectively an ‘island site’. In addition, the proximity to existing residential properties on Oswin Street and the adjacency to the Metropolitan Tabernacle presents significant challenges on their own for the west site, both during demolition/construction and on completion.

Strategic Transport Infrastructure

Elephant and Castle Northern Line Ticket Hall (NLTH)

587. The redevelopment will include the delivery of a new station box, to allow London Underground (LU) to subsequently provide a new replacement ticket hall serving the Northern Line at Elephant and Castle. A Development Agreement between the applicant and Transport for London is being negotiated and this will set out the

detailed arrangements for its delivery. The station box will allow for a prominent new entrance and a new below ground ticket hall to be provided by LU. The entrance will front on to the peninsula in Block E1 ("the UAL Building") and from here the new 'Station Route' will extend into the centre of the site. From this new entrance, escalators will descend to a new ticket hall level where further escalators will link to platform level, allowing for the removal of the existing lifts and closure of the current ticket hall, which will in turn allow for redevelopment of that site, once acquired from London Underground.

588. TfL projections indicate that the existing Ticket Hall will reach full capacity by 2019 and with the increased frequency of Northern Line services also being pursued, congestion at the station is anticipated to increase in the future. *At present, TfL estimate that around 30% of passengers in the morning peak use the emergency spiral staircase to access platforms rather than wait for a lift. Crowd control measures, including temporarily restricting access to the station, are already required sporadically and forecast increases in demand will lead this to happen for greater duration and more regularly.* The works proposed will increase the operational capacity, *efficiency and accessibility* of the station and greatly improve the transition from street to platform level. This represents a significant improvement in strategic transport infrastructure at Elephant and Castle and is a key part of unlocking the growth set out in the Elephant and Castle SPD. The provision of the new ticket hall is strongly supported.
589. The new ticket hall will be delivered in discrete stages and requires considerable coordination between a number of stakeholders. The applicant will directly provide the below ground 'station box' as an integral part of initial works to the sub-structure and superstructure, before handing over to London Underground to complete the final fit-out. This solution can only be achieved through the proposed land transfer which the developer has agreed to facilitate *and TfL have underlined that there is no alternative plan to delivering the station upgrade without this scheme.* A significant financial contribution will be made from the council's CIL receipts and the strategic transport tariff that was levied on Major Developments in the Elephant and Castle Opportunity Area prior to the introduction of CIL.
590. A Development Agreement between TfL and the applicant will address the land transactions, funding, programme and logistics associated with the delivery of the new Ticket Hall. This process has been progressing in tandem with the planning process, but at the time of writing, the Agreement has not been fully agreed. At present, it is understood that there is a funding gap between the projected costs of construction and final fit out and the funding available for the project and this will need to be resolved in order to secure the timely delivery of the new station. However, all parties are committed to the delivery of the new station as an integral part of the development and are working closely to finalise the design. *TfL advise that securing planning permission is a necessary and key step that will allow the detailed design work to conclude and final costs be determined.* It is understood that partners have established a timetable to agree a fixed price for all works by the end of 2018.
591. Details of phasing and responsibilities for works associated with the new Ticket Hall will be set out in detailed s106 Schedules, which will tie in with the Development Agreement. This will include binding obligations on the applicant to deliver 'the station box' and on LU to complete the 'fit-out' within prescribed timescales. The s106 will make clear that planning permission cannot be implemented until the Development Agreement is in place and that the 'existing' ticket hall will not be demolished or its operation unduly compromised until the new ticket hall is operational.

National Rail station

592. The layout of the East Site has been carefully considered to improve the transition between the national rail station, the tube station and the wider town centre, improving the efficiency of this location as a major transport interchange.
593. The removal of the existing basement ramp allows for a new ground level access to be created between the shopping centre and the existing ticket hall (from which stairs go to the platforms above). The diagonal 'Station Route' forms an axis running from the peninsula to the heart of the site, providing a very direct link between the rail station and the Bakerloo/Northern line ticket halls and the wider town centre. The footprint of pavilion building at the centre of the East Site (E4) has been chamfered to improve the visibility of the rail station from various approaches. This provides a more coherent and legible layout and a future strategy for signage and passenger information will also be secured via the s106 agreement.
594. Given the relatively low projected increases in rail passengers as a result of this development and other improvements to sustainable transport arising from the scheme it is not proposed to seek further significant investment in the National Rail station itself. However, conversations between the applicant and Network Rail are ongoing about the need for changes to the western façade of the arches and the interface between these structures and the shopping centre consequent upon demolition for the scheme. Further details about an appropriate scheme of works will be secured in the legal agreement.

Servicing and deliveries

East Site

Background

595. The east site is bounded by roads forming part of the 'inner ring road' (Congestion Charge boundary) of the Transport for London Road Network (TLRN) and so is both busy throughout the day and particularly sensitive to interventions that might affect the efficient operation of the highway. With the future redevelopment of the Shopping Centre in mind, the opportunity for a shared, below ground servicing access was secured via the neighbouring development at Delancey's 50 New Kent Road in 2008 – "Elephant 1" (Application Ref: 08/AP/2403). The basement for the development was constructed with two knock-out panels on the western perimeter of the site that would enable a future connection between the piers of the railway viaduct into the Shopping Centre basement. This approach would remove the need for another ground level connection in close proximity to the roundabout and rail viaduct. Construction details were secured by condition and it was demonstrated that the basement had been adequately designed and the panels had been provided.
596. The feasibility of delivering this shared access route was explored as part of comprehensive pre-application discussions. Initial studies undertaken by the applicant team asserted that although the construction of a tunnel beneath the viaduct was technically feasible, the assumed dimensions between the individual Victorian piers of the railway viaduct meant that the envelope that could be created would not be sufficiently sized for delivery vehicles. The council commissioned Balfour Beatty to carry out an independent review that challenged a number of the assumptions that had been relied upon in reaching this conclusion. The Balfour Beatty investigation concluded that a sufficiently sized tunnel could be engineered by underpinning and

reinforcing the viaduct piers, however, the report did concede that the construction would be particularly complicated and require specialist piling and tunnelling machinery as a result of the spatial constraints and risk to the railway infrastructure. This was anticipated to have significant cost implications that would likely compromise the delivery of other aspects of the proposal, such as affordable housing. Numerous other options were presented by the applicant and having considered these, officers agreed that a new independent access from New Kent Road could be pursued.

597. As TfL is the Highway Authority for New Kent Road, any changes to the highway will need to be agreed by them and delivered via a s278 agreement. As such, TfL officers have also been closely involved in negotiations.

Servicing via New Kent Road

598. Servicing for the East Site will therefore mainly be accommodated at basement level, with a new two way ramped access created to the west of the railway viaduct. The basement will make provision for servicing, deliveries and refuse collection for the various land uses on this site and as such it includes:

4x bays for 10m rigid vehicles;
1x bay for 10m rigid vehicle for UAL;
3x residential waste compactors;
2x retail waste compactors;
1x UAL waste compactor.

599. Initial modelling presented in the Transport Assessment estimated up to 99 servicing vehicles requiring daily access to the basement, so 198 vehicle movements either entering or exiting the basement servicing yard. Of this, 46 trips were associated with the shopping centre, 18 with the residential elements and 35 to UAL. This excludes waste collection, which would add further trips. The management of the servicing yard would be predicated on a booking system of 20min delivery slots, monitored and enforced by a management company. It was initially assumed that these trips would be accommodated during the “inter-peak” period between 10am and 4pm. Assuming an even distribution of trips, this could equate to a vehicle entering or exiting the basement every 2 minutes.
600. Relative to the existing situation, this would represent a sizeable increase in the 50 servicing vehicles that are currently estimated to make use of the basement servicing yard on a daily basis. However, the existing servicing activity is currently compounded by a high number of daily trips associated with the 140 space public car park beneath the shopping centre. These spaces would not be re-provided in the proposed development, the result of which is that the overall number of daily vehicular trips to the East Site is likely to reduce.
601. Pedestrian surveys, data linked to bus passenger numbers and information on traffic flows presented in the Transport Assessment demonstrate that the roads bounding the site do not experience the typical drop-off in activity outside the morning and evening peaks and that activity remains high during the day. This being the case, despite an anticipated reduction in the overall use of the basement, the combination of bus passengers, pedestrians, cyclists and servicing vehicles present a significant challenge with potential impacts on both the safety of road users and the operation of the highway network. TfL in particular have underlined the need for the existing length of bus cage on the south side of New Kent Road to be maintained and unencumbered by servicing proposals, as well as the potential for queuing traffic to have a harmful

impact on the new pedestrian crossing to be delivered to the east of the viaduct. These factors have necessitated a range of design changes and the introduction of a stringent management regime for access to the basement.

Road safety audits

602. A series of road safety audits have been commissioned by the applicant and Transport for London to assess the risks associated with the new access point and identify a range of physical interventions to reduce them. They acknowledge the challenges presented by restricted visibility from the new basement access, including the potential for conflicts/collisions between different road users, and collectively they have resulted in physical changes that include: the relocation of bus cages/stops along New Kent Road and removal of a bus shelter beneath the viaduct; the imposition of a left-in/left-out system and a central median strip to enforce it; and a commitment to a scheme of works to improve the waiting environment and visibility immediately beneath the viaduct. These measures will be secured via the s106 agreement and delivered via a s278 agreement with TfL. As such, TfL will have final approval of the highway layout in consultation with the council. Though these interventions improve the situation, they do not eliminate the risk or fully mitigate the potential impacts of this access; however a range of mitigation measures has been negotiated so that this risk falls to what are considered acceptable levels. These measures are set out below.

Vehicle movements and hours of access

603. Protracted discussions between the applicant, officers and TfL have taken place with a view to avoiding access during the morning and evening peaks and minimising servicing trips during the busy “inter-peak”, while also acknowledging that the shopping centre, university and residential elements of the scheme each have bespoke servicing requirements that need to be catered for if the development is to operate successfully. Discussions have focussed on:

The number and type of vehicles requiring basement access;
The hours of access;
Management of this system.

604. The following arrangements are proposed:

Weekdays

Unrestricted access between 8pm and 6.30am;

No deliveries during morning peak (6.30am – 10am) and/or evening peak (3pm – 8pm) and numbers reduced significantly during the “inter peak” between 10am and 3pm - limited to 34 vehicles on a daily basis (68 movements) for the University only;

An increase for up to 50 vehicles on a maximum of 60 weekdays per year to accommodate exhibitions and end of year shows (an essential part of the University operation). Additional traffic management will be required on these days;

Vehicle sizes during the “inter peak” between 10am and 3pm will be limited to 7.5T;

Access will be granted for emergency maintenance vehicles at any time.

Weekends

Unrestricted access between midnight and 1pm and between 5pm and midnight;

Limited access between 1pm and 5pm for vehicles up to 7.5 tonnes to all land uses up to a maximum of 30 vehicles (60 movements)

No restrictions on Sundays.

Access will be granted for emergency maintenance vehicles at any time.

605. This represents a significant shift relative to the servicing arrangements that were presented on submission on the application. The reduction in vehicle movements during the hours where there is the greatest activity along New Kent Road reduces the risk of conflict between different road users and reduces the risk of obstruction and delay to the free flow of traffic around the peninsula. It also means that the basement has ample capacity to accommodate the servicing demands of the development, because the anticipated servicing trips can now be spread over a much longer period than was intending in the initial design. Tracking diagrams have been provided to demonstrate that the layout and size of the servicing yard is adequate to allow safe and convenient manoeuvring for the largest anticipated vehicles.
606. This arrangement represents a compromise that provides the necessary flexibility for the University in particular, who, given their focus of arts, film and photography, have stressed that daytime deliveries are essential to allow for the transfer of materials and equipment that are fundamental to the successful operation of the University. Though retail and leisure operators can more readily accommodate off-peak servicing, the additional flexibility at weekends within a defined capped number of trips is of commercial benefit.
607. The concessions agreed are such that officers and Transport for London are satisfied that this servicing regime is acceptable. However, it is undoubtedly management intensive and will require a robust monitoring and enforcement regime if it is to work.
608. The above conditions will be enshrined in a detailed Delivery and Servicing Management Plan (DSP), as well as being reflected in future lease agreements for residential and commercial occupiers. The DSP will also need to highlight ways in which the anticipated number of trips can be minimised further, whether through efficiencies in the supply chain or the use of on/off-site consolidation, for example. The DSP will need to establish a clear system of monitoring, feedback and review over the initial years of operation of the shopping centre. These arrangements, including enforcement, will be clearly detailed in the relevant s106 obligations. Further, the detailed design of the basement ramp access will be conditioned so that consideration can be given to the positioning of barriers and monitoring systems that will control access.
609. This arrangement does create a tension for daytime residential deliveries, particularly those from online retailers who offer more immediate delivery. Though it is anticipated that tenancy agreements will set out the limitations described above, the provision of a dedicated parcel 'drop off' facility on or in close proximity to the site is a necessary facility if adverse highway impacts are to be avoided. The applicant has committed to this provision either on or in close proximity to the site, potentially at the Elephant One development or an alternative location which is equally as accessible to residents of the scheme. This location will need to be confirmed in a Delivery and Servicing Management Plan prior to occupation of the residential units.
610. In addition, 3x disabled parking bays for existing members of staff at UAL will be provided to reflect the provision that they currently enjoy at the LCC site.
611. The removal of the residential car parking that was included in the initial basement design for the east site means that there is the potential for additional space to be dedicated to servicing and deliveries if warranted by further investigation and/or for storage or other purposes by UAL or other occupiers.

West Site

612. Servicing and deliveries for the west site will be split between a central servicing yard located at grade beneath the main residential towers and dedicated provision on Oswin Street. With the University relocating to the East Site, trip generation associated with servicing vehicles on this half of the site is actually projected to decrease from around 31 (62 movements) to 20 (40 movements) daily servicing vehicles.
613. The central servicing yard will be accessed via the southern end of Pastor Street, meaning that vehicles can approach either from Brook Drive or Oswin Street. Although this means that servicing vehicles are directed down smaller residential streets, this is tempered by the relatively low number and size of servicing vehicles and is considered the most pragmatic option given the potential impacts on the TLRN and the layout and public realm within the scheme. A direct access from the site to St Georges Road or Elephant and Castle would have introduced similar risks of conflict with pedestrians, buses and cyclists as have been discussed for the east site. Access to the basement car park is located at the northern end of Oswin Street and achieving a clear separation between this area and the servicing yard is considered a sensible and practical response.
614. The central servicing yard primarily caters for the two residential towers and the new music venue and will contain 3x loading bays, each containing a single compactor and each accommodating a single 10m rigid delivery vehicle or two smaller vans at any one time. The same management regime as proposed for the East Site is intended, with bookable 20min slots. Over a 6 hour window between the morning and evening peaks (10am to 4pm), this equates to between 54 and 108 delivery slots. The trip generation figures presented suggest that the servicing yard has ample capacity and swept path analysis demonstrates that there is sufficient manoeuvring space to accommodate vehicle movements. These figures do exclude refuse collection and trips associated with the disabled car parking contained at basement level (though no access to the private car park is provided via the servicing yard). These issues are assessed below.
615. On Oswin Street, it is proposed that 3x new dedicated servicing bays are provided on the eastern side of the carriageway to accommodate deliveries and refuse collection for the residential units and office floorspace located within the Mansion Block (W3). Officers have raised concern that such a deliberately engineered solution will create a lot of wasted kerbside space when the bays are not being used for deliveries or waste collection. Instead, it has been requested that the carriageway be widened to improve vehicular movement and that deliveries simply take place from the kerbside. A planning condition is proposed that will allow for a design to be developed at the appropriate stage in the development of the West Site, though the fine detail will be confirmed through the s278 Highways approval process.
616. *A supplementary note has been submitted which sets out the likely trip generation if a bingo facility were to be provided on the West Site in the building currently envisaged to be a music or leisure venue. The modelling takes into account the trips associated with other comparable bingo facilities in the TRICS database, the floorspace available in this building, feedback from a survey of the existing bingo users undertaken by AECOM in 2017 and the likely methods of transport for leisure facilities in a central London location. The note anticipates just under 500 daily people movements, with more than half of these being pedestrians, followed by just over 100 rail passengers and around 20 daily trips are anticipated to be by car. Given the absence of car*

parking in the development and local controlled parking zone restrictions, such trips would be in the form of quick 'drop-offs'. Should this be the case, the assessment anticipates around 2 trips per hour, which could very easily be accommodated at kerbside on the surrounding streets without harming the amenity of residents or being detrimental to the highway network.

617. As with the east site, a Delivery and Servicing Management Plan will be required that reflects the specified hours of access, demonstrates attempts to minimise servicing trips insofar as possible and establishes a robust, credible management and monitoring regime. This will be secured by via the s106 agreement.

Waste Management

618. The waste management strategy has been estimated through a combination of referencing the council's guidelines for general and recycling waste for residential units, an assessment of anticipated waste arisings for commercial space based on the land uses proposed and consideration of the existing waste requirements for UAL.
619. For the residential towers, a central waste chute will be provided that can be accessed from each floor. Residents will select whether they are depositing general or recycling waste and this will dictate which bin it is directed to. The applicant asserts that this system operates successfully in other high density residential schemes in London. The system includes a number of safeguards to ensure that it works effectively; the hopper on each floor is much smaller than the size of the chute to avoid the potential for blockages; the system will only operate on one floor at any one time; and when staff are rotating the bins at the base, the hoppers will not be operational at each floor. Commercial users (and UAL) will have access to dedicated bin stores in each of the servicing yards. Each building will make use of compactors to further reduce the volume of waste and, therefore, the required number of collections.
620. The exception to this system is the Mansion Block on the west site, which will instead contain 3x communal bin stores for each of the residential sections and 2x commercial bin stores. These will be collected from the kerbside on Oswin Street, whereas all other collection will occur within the service yards. Swept path analysis has been provided to demonstrate that servicing yards and kerbside spaces are all adequate for manoeuvring collection vehicles.
621. The vast majority of residents are within the recommended 30m between their properties and the waste chute/or bin store in the case of the Mansion Block on the west site.
622. The strategy is space efficient but very management intensive and will require considerable involvement of site based facilities management teams if it is to function effectively. FM staff will transfer waste to compactors located within the servicing yards of both sites where they will be ready for collection – twice a week in the case of residential units and daily in the case of commercial operators.
623. The approach follows the recommendations of the council's waste management team and is broadly supported.

Construction Management

624. An outline construction management plan (CMP) has been submitted that anticipates the overall programme and phasing of demolition/construction and the nature/intensity

of construction related activities at different stages over a projected 10 year period. The CMP highlights that progress on the East Site and West Site will occur independently, with a clear gap between completion of the East Site and commencement of enabling works on the West.

625. The CMP anticipates up to 6 separate access points for the East Site and 3 for the West Site, the majority of which will be operating in tandem when construction is underway on the respective sites. The use of the existing basement ramp from Elephant Road prioritised initially for demolition and the construction of the new sub-structure, which is supported given that this allows for access on to Elephant Road rather than directly on to the Elephant and Castle peninsula.
626. Trip generation has been projected for different types of construction vehicle on a quarterly basis for the entire programme. At its peak, the CMP estimates an average of 150 vehicles per day arriving at the East Site across a 6 month period, though between 80 and 100 vehicles per day are anticipated for the majority of the programme.
627. TfL have provided a range of detailed comments on the potential impacts on the highway network during demolition and construction, including on the specific challenges presented by each of the principal construction access points around the site. Each access will need to be carefully managed through a combination of banksmen, physical barriers and limitations of their hours of use to avoid morning and evening peaks. The precise location of the hoarding line will also need to be determined to ensure that bus stops and pedestrian footways can continue to function efficiently and safely. On the West Site, vehicular access points are focused to the north of the site adjacent to St Georges Road, which is beneficial from both a highways perspective and in limiting the amount of construction traffic accessing residential streets to the west of the peninsula- particularly Oswin Street.
628. At present, the draft document assumes the imposition of the council's standard construction hours that would apply on weekdays and Saturday mornings. However, the highways challenges detailed above and proximity to the railway viaduct will necessitate a much more detailed assessment of issues including the timings of vehicular arrivals to the site and particular demolition/construction related activities.
629. The submitted CMP focuses heavily of highways impacts as opposed to environmental mitigation to address potential contamination, noise, vibration and/or air quality impacts - though these issues are recognised and addressed as part of the Environmental Impact Assessment. Notwithstanding the legislative provisions that exist under the Control of Pollution Act 1974 (as amended), specific measures will need to be incorporated into more detailed CMPs to ensure that potential impacts on nearby residents and the town centre more generally are adequately addressed. Robust monitoring will be required for the duration of the demolition and construction programme.
630. Given the intensity and duration of construction activity, the applicant has underlined a commitment to adhere to a range of best practices schemes that focus on site safety, environmental mitigation and close liaison with affected residents, including the Considerate Constructors Scheme, FORS, CLOCS & WRRR. A specific commitment is made to hiring a Community Liaison Officer to act as a focal point for all resident/business and other interested parties that might have enquiries during the development programme.

631. A range of temporary highways works will be required to facilitate, or mitigate, construction activities. Such measures include the construction of reinforced crossovers and potentially the relocation of existing transport infrastructure such as bus stops and/or cycle parking. The scope of works will be set out in the s106 agreement, specific interventions set out in the CEMPs for the individual phases and their timely delivery secured via a s278 agreement.
632. At this stage, the CMP represents an informed but largely indicative management plan that adequately models the intensity of construction related activities and the potential highway impacts. Though it establishes some key principles. However, further detail on site layout and clear commitments to site management and monitoring regimes will be required for the individual phases once contractors are appointed. This point is acknowledged by the applicant and has been emphasised by officers in highways, environmental protection and by Transport for London through consultation. Further detailed demolition and construction management plans will need to be secured for both the East Site and the West Site via the s106 agreement.
633. Given the proximity of demolition/construction activities to existing infrastructure, TfL highlight that close co-ordination will be required with Network Rail and London Underground. It will be stipulated in the s106 that the complexity of construction and logistics necessitates regular, structured liaison with a range of stakeholders – indeed the submitted CMP commits to this – though separate asset protection agreements should be pursued outside of the statutory planning process, where necessary.

Cycle parking

634. The council's core strategy underlines a commitment to sustainable travel and London Plan Policy 6.9 establishes minimum cycle parking standards for various use classes. The proposal includes a substantial investment in cycling infrastructure within the buildings and the public realm amounting to 1,988 long-stay and 285 short-stay cycle parking spaces.
635. Residential cycle parking numbers meet those specified in the London Plan (776 for the East Site and 850 for the West Site) and all parking will be located within secure stores, principally within the basements of each site. Understandably, cycle storage is divided between numerous storage areas accessed directly via lifts in the various building cores, ensuring that it is convenient for residents. Ancillary spaces for cycle maintenance are also provided on each site.
636. Cycle parking for the university is based on the known number of staff and students and amounts to 291 long stay spaces, while those allocated to the cultural venue (7 spaces), retail (20 spaces) and leisure space (4 spaces) based on a combination of floor space or assumed capacity, as per the requirements of the London Plan. Provision is also made for showering and changing facilities close to the university and retail cycle parking areas.
637. Cycle parking will make use of a range of types of storage and though the precise split will be confirmed prior to occupation, it will conform to the following principles:

		Double Stacker	Upright	Sheffield (Horizontal)	Extra Large	Folding
LONG STAY	Residential	<80%	<5%	>15%	>1 per store	-
	Commercial	<80%	<5%	>15%	>1 per	-

					store	
	UAL	<90%	<5%	>5%	>1 per store	5%

638. All short stay parking for visitors will be provided within the public realm in the form of Sheffield stands or similar horizontal storage. In addition to a large dedicated external cycle parking area for UAL students located between the new university building and the viaduct, it is anticipated that a series of smaller cycle parking areas will be located around the periphery of the site, including at the top of Walworth Road, on the Peninsula and along St Georges Circus. Provision meets the London Plan standards with the exception of leisure (cinema) space. This is provided at 50% of the London Plan standard on the basis that cinema use will often be at evenings and weekends and so visitors can also make use of the short stay spaces allocated to retail and educational uses on the east site. This is considered a practical response that avoids the public realm from being inundated with cycle parking.
639. Locations for short-stay cycle parking have been suggested by the applicant, having considered the relationship with pedestrian movement, bus stops locations and the need to ensure convenient access to the various parts of the development. Final locations will be confirmed as part of the detailed Public Realm design and/or via s278 agreements with the relevant Highways Authorities and the delivery phased to reflect the gradual completion/occupation of the development.

Cycle Hire

640. The scheme will deliver an additional 60 cycle hire docking points, split between 2x new locations: one primarily serving the East Site and one the West. Broad locations have been identified as appropriate by the applicant, but the precise location and timing of delivery will be set out in the s106 agreement.
641. It is anticipated that the existing docking station south of the Shopping Centre on Walworth Road can be retained and remain operational during demolition and construction. However, in the event that more detailed analysis reveals that a temporary suspension is necessary, the s106 agreement will make clear that a replacement facility will need to be installed prior to the removal of this facility. It is anticipated that the alignment of this facility will be changed to reflect the new building line at the south of the shopping centre.
642. As a measure to stimulate use of cycle hire use and contribute to sustainable travel, it is proposed that membership of the cycle hire scheme is secured for each new property for a period of 3 years as part of the 'welcome package'. This will be secured via the s106 agreement.

Car Parking

643. A car free development is proposed with the exception of a limited amount of wheelchair accessible parking. It is not proposed to replace the existing car parks serving the shopping centre or the London College of Communication. This approach is very much consistent with the sustainable transport policies in the London Plan and Southwark Plan, both of which stress that private parking should be minimised in areas of high public transport accessibility and establish only 'maximum' car parking levels. This approach is also advocated in the Elephant and Castle SPD.
644. Concerns have been raised by a local resident and by the Metropolitan Tabernacle

regarding the loss of the existing car parks adjacent to the LCC and beneath the shopping centre. The points raised include the impacts on the operation of the Tabernacle (who currently utilise both car parks), on the removal of a facility that offers convenience for residents who are less mobile and on the loss of income to the council as a result of removing the shopping centre car park, specifically. While these concerns are noted, the Development Plan sets out a very strong policy presumption that sustainable methods of travel be pursued. The retention or re-provision of these car parks would not be consistent with this aim. The local area already benefits from excellent public transport options and the development will deliver substantial improvements in the quality of public realm, makes proper provision for active travel and will enable improved public transport, notably by virtue of facilitating a new ticket hall for the Northern Line. The existing shopping centre car park income goes to the applicant as owner, not the council. *It is also noted that the areas of hardstanding immediately west and south of the Tabernacle provide off-street storage for the majority of this fleet – site visits reveal up to 17 of the stated 20 minibuses can be parked on-site. Officers have previously offered to work with the Tabernacle to review their operation, to try to find efficiencies and/or new ways of accommodating their activities and this offer still stands.*

645. 34x wheelchair accessible parking spaces for residents will be provided in the basement of the western site, with access provided via a ramp at the northern end of Oswin Street. This provides convenient access to St Georges Road and limits the number of vehicles needing to drive down Oswin Street. The basement spans all three residential blocks on the west site and there is convenient access from the parking area to the lift cores serving each of the blocks. All spaces have been sized to meet the access requirements enshrined in Building Regulations, 20% (6 spaces) of these spaces will be active electric vehicle charging points and *the remaining 80% (28 spaces)* passive spaces, capable of being activated in future if demand arises. The initial proposal to include 13x accessible spaces in the basement on the east site for residents of the east site has been removed given the above mentioned concerns regarding basement access.
646. This level of parking provision equates to 35% of the total number of wheelchair user dwellings, or 68% of those on the West Site, and this is considered acceptable having regard to the London Plan and Elephant and Castle SPD, which both advise that *adequate* parking for disabled persons should be provided. Emerging New Southwark Plan policy P53 stipulates a maximum provision of 1 accessible parking space per unit with consideration given to anticipated demand given the tenure of housing; the quality and accessibility of local public transport and car ownership levels. Officers consider that these factors support a lower level of accessible parking provision at this site.
647. In addition to the above residential parking, 3x wheelchair accessible parking spaces are to be located in the basement of the east site for existing UAL staff members. This reflects the existing provision enjoyed by particular members of staff on the LCC site and is considered a reasonable provision. To avoid compromising the detailed servicing regime that is outlined above, automated number plate recognition will be installed at the basement access to allow unencumbered access for this very limited number of vehicles.
648. Further provision is made for the storage/charging of 8x mobility scooters on the mezzanine level of the east site. This storage space will be accessed via lifts in the residential core rather than via the basement. There is no policy requirement for such provision, but it is considered a reasonable facility given the scale of development proposed.

649. The site is located within a Controlled Parking Zone (CPZ) and as such new residents and commercial occupiers will be prevented from obtaining on-street parking permits in order to avoid parking stress. *Planning Committee Members previously raised concern that the development might lead to parking stress outside the hours of operation of the existing CPZ. The applicant has committed to a review of on-street parking prior to occupation of the West Site and, if this reveals that local streets have no spare capacity, to facilitate changes to the hours of operation of the CPZ to better prevent parking stress. This mechanism will be secured in the s106 agreement.*

Public realm and permeability

650. The redevelopment of the site provides an opportunity to greatly improve the public realm at the heart of Elephant and Castle with a dual focus on quality and connectivity.
651. The block structure of each half of the site has been designed to increase permeability and key desire lines around the peninsula. For the east site, this includes the creation of two key routes: the 'Station Route', which runs from the peninsula to the heart of the East Site and connects the two tube stations to the national rail station; and the 'Park Route', which runs from Elephant and Castle through the railway arches to Elephant Park. At the confluence of these routes is a new central court that could be used as a temporary events space. A further route to the east of the southern block has been opened up to improve direct access into the site from Walworth Road and from the bus stops to the south of the shopping centre. Active frontages have been pursued throughout to animate the public realm and 'back of house' facilities have been minimised or located in less prominent places.
652. These connections – particularly the Park Route – greatly improve the permeability of the site and by improving connections with the wider town centre, fulfil a key ambition of the Elephant and Castle SPD. The delivery of this route through the arches is subject to a commercial agreement between the applicant and Network Rail. Given its importance in improving east-west connections across the site and the Town Centre, a specific planning obligation is included in the s106 agreement that requires its delivery or an alternative.
653. For the west site, the existing servicing access to the LCC and Tabernacle – Pastor Street – is extended towards St Georges Circus and will act as a new hard landscaped shared space, bounded by commercial spaces at ground floor level but also accommodating some servicing access. The public realm here directs movement in a north/south direction, with the Mansion Block (Block W3) reinforcing the residential character of Oswin Street.
654. Surveys undertaken as the proposals emerged identified that pedestrian flows reach around 3,000 pedestrians an hour on Elephant and Castle and just in excess of 2,000 pedestrians an hour on New Kent Road during the peaks and given the quantum of development proposed within this scheme and within the wider Opportunity Area, this is expected to increase. These surveys have influenced the public realm design and underpin a Pedestrian Comfort Level (PCL) assessment, as advocated by TfL.
655. The PCL analysis is effectively an assessment of crowding; it considers the number of people in a given space. The analysis has been used to inform the design of individual routes and pavement widths around both sites. Footways widths have generally increased throughout – with minimums of 5m on the East Site where activity is likely to be greatest and both the Station and Park Routes designed with a 9m width. The

information presented demonstrates a significant improvement and that excellent pedestrian comfort levels will be achieved.

- 656. The quality of these spaces is contingent on a range of more detailed design issues, including landscaping treatments, tree planting and microclimate, and although these issues have influenced the current public realm proposals, it is recommended that a more detailed public realm strategy is secured in the legal agreement for approval prior to occupation.
- 657. This strategy – or a bespoke strategy – will also be required to set out details of the approach to signage, including the installation of Legible London signage. This may be undertaken directly by the applicant or via a payment made to TfL to deliver.
- 658. Despite the detailed design being deferred to a future strategy, it is clear that the development will deliver a more functional, efficient and higher quality public realm that is of great benefit to the wider town centre at Elephant and Castle.

Travel Plan

- 659. A draft Travel Plan Framework has been prepared and sets out a range of measures that will encourage future residents, employees and visitors to the site to make use of sustainable travel choices. The plan follows TfL guidance, establishing clear objectives, interventions and a monitoring framework to consider whether more sustainable travel has been achieved. It is noted that a work place travel plan is also in place for the UAL.
- 660. The Travel Plan summarises investment in physical infrastructure to facilitate more sustainable travel as follows:
 - Facilitation of New Northern Line Ticket Hall
 - 2,000+ cycle parking spaces;
 - 2x Cycle Hire Docking Stations (and retention/relocation of the existing one);
 - Significant public realm investment and improved permeability;
 - Signage and wayfinding strategy to be developed;
 - Bus stop upgrades and real-time public transport information;
 - Car free development.
- 661. A suite of softer measures will be offered both by the residential management company and the University, including the presentation of a resident travel pack as part of the broader 'Welcome Pack' for all new occupiers and the promotion to staff and students of the University's "Travel Pack", which maps the local area, local facilities and travel options, and includes information on carbon off-setting.
- 662. It is proposed to appoint a Travel Plan co-ordinator to act as a focal point for contact and to monitor and evaluate the success of these interventions over time. The approach to travel planning is acceptable and officers are content that the scheme comprises a range of interventions that will facilitate more sustainable travel to and from the site.

Highways works

- 663. The development requires a range of highways works to both reflect the quality of the new architecture and public realm and to mitigate the impacts of a development of this scale. The scope and phasing of the permanent highways works will be outlined in the

s106 agreement and their delivery ultimately secured through s278 Agreements with the council and Transport for London, where appropriate. These works are anticipated to include:

East Site:

Remodelling and paving of footpaths and kerblines around the perimeter of the site;
 Provision of a new servicing access and associated footway/carriageway works;
 Remodelling of the Elephant Road/New Kent Road junction;
 Installation of a raised table on Elephant Road between market square and 'route through the arches'.
 Relocation of bus stops on New Kent Road/Elephant and Castle;
 Realignment of existing cycle hire docking station to the south of the shopping centre;
 Installation of short stay cycle parking;
 Tree planting.

West Site:

Remodelling of footpaths and kerblines around the perimeter of the site;
 Re-design and landscaping of eastern side of Oswin Street;
 Installation/relocation of short stay cycle parking;
 Tree planting.

664. In addition to these permanent works, a series of temporary highways works will be required during demolition/construction to adequately mitigate the impacts of these processes. It is anticipated that such measures will be clearly identified in the relevant demolition/construction environmental management plans, which will be prepared for each Phase.

Adoption and Stopping Up of the Public Highway

665. The comprehensive redevelopment of the site creates a new relationship between the building footprints, public realm and land that is formally recognised as Public Highway. It is proposed that various parcels of land on both sides of the peninsula are 'adopted' and/or 'stopped up' so that anomalies linked to previous road layouts are addressed and a coherent area of land is recognised as forming part of the Public Highway. This is a formal process to be pursued separately under s247 of the Town and Country Planning Act. Detailed plans will be appended to the s106 agreement, but the changes can be summarised as follows:

East Site

Land to be stopped up	Land to be adopted
Two parcels of land south of the Shopping Centre at corner of Walworth Road	Land at back of footway on eastern side of Elephant and Castle;
Lower area around Shopping Centre perimeter	Land between Shopping Centre and new peninsula;

666. West Site

Land to be stopped up	Land to be adopted
Existing turning head off Pastor Street (currently LCC storage)	Land running along eastern side of Oswin Street;

Sliver of land adjacent to LCC public realm	Land along northern boundary of LCC building between peninsula and Oswin Street;
Triangular area of public realm between the LCC building and St Georges Road	

Transport conclusions

667. The characteristics of the site mean that anticipated trip generation, demolition/construction activities and servicing demands all present challenges. However, it is clear that the scheme secures significant improvements in public transport infrastructure and the public realm, both key ambitions of the Elephant and Castle SPD. The council and TfL are satisfied that through a combination of design and through the imposition of detailed planning conditions and obligations, the transport impacts described above can be successfully managed and/or mitigated, though this will in some instances require robust monitoring and enforcement. Subject to these measures being secured, the transport impacts are considered to be in accordance with the Development Plan.

Air quality

668. The site sits within an air quality management area. Policy 7.14 of the London Plan 'Improving Air Quality' seeks to minimise the impact of development on air quality, and sets a number of requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality. A number of neighbouring residents have raised impacts upon air quality as a concern following public consultation on the application.
669. Air quality is considered in chapter 10 of the ES; the acceptability of the air quality on the proposed uses within the development has been considered in the quality of accommodation section of this report.

Demolition and construction phase

670. The ES advises that the main impact upon local air quality during demolition and construction would relate to dust. Measures to reduce this would be secured through a construction management plan which could include damping down dusty materials. It could also include the use of low emission plant and machinery and with mitigation measures in place, the ES predicts that impacts on air quality during demolition and construction would be insignificant.

Completed and operational development

671. The impact of heating plant emissions and traffic have been considered within the ES. It concludes that the development would not give rise to significant air quality effects and that it would be air quality neutral, largely owing to a reduction in vehicle trips by way of reduced parking compared to the existing situation. As set out in the quality of accommodation section of this report, a condition is recommended requiring details of the heating plant chimney stack height and dispersal model to be submitted for approval. The ES concludes that the completed and operational development would have an insignificant impact upon air quality.

Conclusion to air quality

672. Subject to conditions, it is concluded that the proposal would comply with the development plan in relation to air quality.

Ground conditions and contamination

673. Policy 5.21 of the London Plan advises that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.
674. Ground conditions and contamination are considered in chapter 11 of the ES. Potential receptors for contamination include construction workers, users of the proposed development, current and future off-site users of the site, and shallow and deep ground waters.

Demolition and construction

675. Two desk-based preliminary risk assessments were carried out in July 2014 and August 2015, and were updated in 2016 to reflect the current planning application. The assessments identify the potential for contaminated land owing to past industrial uses on the site, and potential impacts during construction owing to storage of potentially contaminative materials on the site. A detailed site investigation would be undertaken prior to demolition and construction determine and quantify the level of any contamination present, and to inform any necessary remediation strategies. With mitigation measures in place the ES predicts that the impact of contamination would be insignificant.
676. The ES also identifies the potential for unexploded bombs, and recommends that a specialist engineer be present on site during below ground works. An informative to this effect is recommended, which advises that the Police and the council's Emergency Planning and Resilience Officer should be notified in the event that any anomalies are detected.
677. EPT has reviewed the application in relation to contamination, and conditions for further investigation have been included in the draft recommendation.

Completed and operational development

678. The ES advises that the construction process would result in the removal of a significant volume of contaminated material from the site.
679. Much of the completed development would comprise buildings and hardstanding which would create a barrier to any residual contamination in the remaining soil and groundwater beneath the site. Whilst ground level gardens are proposed for plot W3 (the mansion block), this part of the site is not recorded as having been used for industrial activities in the past and clean top soil would be imported to create the new gardens. Contamination impacts for the completed development are predicted to be insignificant. The only exception to this is in relation to groundwater where the impact is predicted to be long-term, local, minor and of beneficial significance, owing to the removal of large quantities of contaminated soil from the site.

Conclusion to ground conditions and contamination

680. Subject to conditions, it is concluded that the proposal would comply with the

development plan in relation to ground conditions and contamination.

Water resources and flood risk

681. Policy 5.13 of the London Plan advises that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Strategic policy 13 of the Core Strategy sets a target that major development should reduce surface water run-off by more than 50% and policy 15 of the Elephant and Castle SPD requires public realm to incorporate sustainable urban drainage systems.
682. Chapter 12 of the ES considers water resources and flood risk. In relation to water resources it considers the impact of the proposed development on the capacity of foul and potable water supply infrastructure. For flood risk it considers whether the proposed development would increase the risk of flooding on or off the site, together with surface water drainage. Concerns have been raised by the Metropolitan Tabernacle that they have experienced a number of floods in their basement in recent years, potentially linked to the significant redevelopment being undertaken in the area.

Water resources

Demolition and construction

683. The ES predicts that demolition and construction activities would result in a temporary, minor increase to foul water flows, but given the low volumes expected this is would have an insignificant effect upon the Thames Water network.

Completed and operational development

684. The ES advises that there would be an increased demand for water supply as a result of the proposal, but that the implementation of water efficiency measures such as low flow water fittings would be incorporated to minimise demand as far as possible. The ES predicts that there would be insignificant impacts upon foul and potable water infrastructure capacity.
685. Thames Water has reviewed the application and advised that the existing water supply infrastructure has insufficient capacity to meet the additional demands of the proposed development, and as such has requested that a condition for an impact study be imposed upon any forthcoming permission. This has been included in the draft recommendation, together with other conditions recommended by Thames Water including for piling method statements to protect existing infrastructure.

Flood risk

686. The site is located in flood zone 3 which is identified as having a high risk of flooding. Paragraph 100 of the NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. However, the council's Strategic Flood Risk Assessment acknowledges that development within flood zone 3 is required, and is allowed with the application of the Exception Test set out the NPPF.
687. For the Exception Test to be passed it must be demonstrated that the development

provides wider sustainability benefits to the community that outweigh flood risk, and that a site-specific flood risk assessment must demonstrate that no adverse impacts would occur.

688. The site is located on previously developed land and there are strong sustainability reasons why it should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall in housing in the area. The site has excellent access to public transport, and the proposed design is capable of providing good quality housing, with less vulnerable commercial space at ground floor level for all but plot W3 on the west site. The site is located within an opportunity area where significant new development is supported in principle, and the east site is designated a proposal site.

Demolition and construction phase

689. The ES identifies that demolition and construction work could result in a temporary risk of surface water flooding, and recommends that measures be put in place to prevent. It also identifies the potential for localised groundwater flooding during excavation works to construct the proposed basements. The submission advises that construction practices would be employed to prevent this and that with these in place, the impact would be insignificant.
690. The council's Flood and Drainage Team has reviewed the application and requested the submission of a Basement Impact Assessment which was duly submitted. The assessment has been considered by the Flood and Drainage Team and is generally acceptable, although a condition for further details is recommended.

Completed and operational development

691. Although flood zone 3 has a high risk of flooding, the site is protected by the Thames flood defences therefore the risk of flooding from the Thames is considered to be low. In the unlikely event that the Thames flood defences were breached coupled with an extreme water level, it is predicted that part of the site would experience flooding. As mitigation the ES recommends a condition for a flood evacuation plan, and this forms part of the draft recommendation.
692. The Environment Agency (EA) has considered the application and has no objections, but has issued advice relating to finished floor levels, measures relating to safe access to and from the proposed basements, and regarding flood evacuation plans and these have been included in the draft recommendation. The ES predicts that proposed development would not increase flood risk elsewhere and that flooding impacts would be insignificant. The objection received from the Tabernacle has been shared with both Thames Water and the council's Flood and Drainage Team, who are satisfied that the proposal would not result in any adverse flood risks.
693. A surface water drainage strategy has been submitted which includes measures to reduce water run-off from the site and takes into account potential future increases in rainfall owing to climate change. Surface water run-off from the site would be attenuated through the use of underground storage tanks and a green roof. Through these measures surface water run-off would be reduced by 50% over the existing situation. The ES predicts that this would have a long-term, local, beneficial impact of minor significance. Officers are satisfied with this conclusion given the responses statutory and internal consultees and having taken all other consultation responses into account.

694. The Metropolitan Tabernacle has requested that the s106 agreement includes a mechanism which protects the Tabernacle in the event that the church suffers any flooding impact as a result of the proposed development. However, other than construction impacts which could be managed, no significant adverse impacts have been identified, either in the Environmental Statement or by statutory or internal consultees.

Conclusion to water resources and flood risk

695. Subject to conditions, it is concluded that the proposal would comply with the development plan in relation to water resources and flood risk.

Sustainable development implications

696. 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. It states that where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere. 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. Of note is that residential buildings must now be carbon zero, and non-domestic buildings must comply with the Building Regulations in terms of their carbon dioxide emissions.
697. Policy 19 of the Elephant and Castle SPD 'Energy, water and waste' requires development to meet the highest possible environmental standards in line with the Core Strategy, the London Plan, Code for Sustainable Homes (now withdrawn) and BREEAM. Concerns have been raised in response to public consultation that the proposal would not comply with the council's energy policies.
698. The applicant has submitted an energy strategy in support of the application, based on the Mayor's energy hierarchy. A supplementary document has been in order to address concerns raised in the GLA's stage 1 report.

Be lean

699. The use of passive design energy efficiency measures such as high performance glazing and insulation and low energy lighting would result in a 4% reduction in carbon dioxide emissions compared to a scheme compliant with the Building Regulations.

Be clean

700. The site is within close proximity to the Elephant Park district heating network which is on the site of the former Heygate Estate. It has been designed to service all of the new homes being delivered on that site, and would have capacity to serve the proposed development as well. As the neighbouring energy centre has not yet been completed, the proposed development would be future-proofed so that it could connect to this network in the future, and clauses to secure this are required in the s106 agreement.
701. The development would have its own Decentralised Energy Network (DEN) served by an on-site energy centre within the basement of the east site. This would be run by

high efficiency gas-fired boilers and combined heat and power (CHP) engines. This would deliver all of the domestic hot water for the development and up to 45% of the space heating requirements, resulting in a 22% reduction in carbon dioxide emissions compared to a scheme compliant with the Building Regulations.

Be green

702. Solar photovoltaic panels are proposed on the roof of the proposed LCC building to provide electricity. This would result in a 1% reduction in carbon dioxide emissions compared to a scheme compliant with the Building Regulations.
703. A combination of the above measures would deliver a 27% reduction in CO₂ emissions across the entire development. A 35% reduction is required for the commercial space (24% would be achieved), and carbon zero is required for the residential units (a 31% reduction would be achieved). The proposal would therefore fall short of the policy requirement. A contribution of £2,234,600 towards the council's carbon off-set fund would therefore be required, comprising £1,213,473 for the east site and £1,021,127 for the west site and terms to secure this have been included in the draft s106 agreement, together with clauses to secure the on-site measures.
704. The GLA has reviewed the additional information submitted and is satisfied with the proposed energy strategy.
705. Southwark's strategic policy 13 of the Core Strategy 'High environmental standards' requires developments to meet the highest possible environmental standards, and sets the following targets relevant to the application:

Community facilities should include at least BREEAM 'very good'

All other non-residential development should achieve at least BREEAM 'excellent'

Major developments should achieve a 44% saving in carbon dioxide emissions above the building regulations from energy efficiency, efficient energy supply and renewable energy generation

Major development must achieve a reduction in carbon dioxide of 20% from using onsite

or local low and zero carbon sources of energy

Major developments must reduce surface water run-off by more than 50%

Major housing developments must achieve a potable water use target of 105 litres per person per day.

706. The submission advises that most of the non-residential elements of the development would be capable of achieving BREEAM 'excellent', although the retail floorspace and cultural venue would target 'very good', with an aspiration for excellent. This is because these facilities would be fitted out by the end users which is not within the applicant's control, and a number of the BREEAM credits are available at the fit-out stage. Whilst this is noted, the proposal is for a large new retail development, and if BREEAM excellent cannot be achieved on a proposal such as this, it is questionable where it could be achieved. Future tenants could be made aware of the requirements and plan accordingly, therefore a condition requiring BREEAM 'excellent' to be met for the retail space is recommended. The development would only achieve a 1% reduction in carbon dioxide emissions from renewables, well below the SP13 target which is predominantly due to limited available roofspace for PVs. Surface water run-off and water use have been seen considered in the water resources and flood risk section of this report.

Overheating assessment

707. This has been undertaken to evaluate the risk of overheating during the summer months. The findings are contained in the energy strategy, and no overheating risk has been identified.
708. Saved policy 3.3 of the Southwark Plan advises that planning permission will not be granted for major development unless the applicant demonstrates that the economic, environmental and social impacts of the proposal have been addressed through a sustainability assessment; the applicant has submitted a Sustainability Strategy to address this requirement. These issues are also considered in a number of the other planning application documents, including the ES, the Equalities Statement and the Energy Strategy.
709. The proposed development would generate a significant number of construction jobs and the construction process would give rise to expenditure in the local and regional economies. It is estimated that between 395 and 572 new jobs would be created in the completed development which would contribute to the regional economy. Existing businesses would be displaced as a result of the proposal, and measures to support them have been set out in the land use and equality implications section of this report. The provision of new retail, leisure and education floorspace would have positive social impacts. The provision of 797 new residential units would contribute to the stock of housing in the borough, and 36% affordable housing including social rent equivalent units (in terms of rent levels) would be provided. The new residential population (approximately 1,850 people) has the potential to contribute an additional spend of £1.6m per annum in the opportunity area and £3.6m per annum in the borough. This would have positive economic and social impacts within the borough. It is noted that borough CIL contributions would be secured to contribute towards the infrastructure required to support growth.
710. Measures relating to environmental sustainability have been set out above, including passive design measures, a site-wide energy centre, solar photovoltaics and a contribution towards the council's carbon off-set fund.

Conclusion to sustainable development implications

711. Subject to conditions and s106 obligations it is concluded that the proposal would comply with the development plan in relation to sustainable development implications.

Archaeology

712. Part of both the east and west sites sit within the Kennington Road and Elephant and Castle Archaeological Priority Zone (APZ). Policy 7.8 of the London Plan advises that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. Saved policy 3.19 of the Southwark Plan is also relevant, which sets out the council's approach to protecting and preserving archaeology within the borough.
713. Archaeology is considered in chapter 13 of the ES. It advises that the site has the potential for archaeological remains, and that the survival of these remains is varied and localised, with survival more likely in open areas than areas currently occupied by

basements. The likely effects arising from the proposed development would be from excavation and foundation works.

Demolition and construction

714. The ES advises that no buried heritage assets of very high significance which would merit in-situ preservation are anticipated, and that with an agreed programme of archaeological works including excavation and recording the impacts would be insignificant. However, as set out below additional archaeological information has been requested and submitted during the course of the application.

East site

715. The council's EIA scoping opinion advises that the most significant archaeological site within the Elephant and Castle area is the Newington Butts Theatre, which could be the earliest Shakespearian theatre in London. Its precise location is unknown, although the Survey of London locates the theatre on the east side of Walworth Road near the junction with the New Kent Road. Given the earlier junction arrangements at Elephant and Castle when the survey volume was written, it may well place the potential location of the theatre near to the Charlie Chaplin Pub or in the area to the north of the shopping centre. The scoping opinion advises that a desk-based assessment be undertaken which should examine records in an effort to locate this potentially nationally important site which if located, would likely be considered nationally important, requiring preservation in-situ.
716. The applicant has submitted a Desk Based Assessment which includes a thorough analysis of the likely location of the Shakespearian theatre. However, it did not contain sufficient information to establish whether the theatre could survive on the site. Additional information has subsequently been submitted, and it is recognised that most remains under the shopping centre are likely to have been removed, with only a few pockets where archaeology could potentially survive. As such conditions are recommended, including for details of the foundation and basement design to be submitted for approval. In the event that the theatre is located beneath the site, the foundation and basement designs would likely have to be amended to enable it to be preserved in-situ.
717. It is considered that both the Coronet and the Shopping Centre should be recorded prior to demolition, and a condition to secure this is recommended. Although the Coronet was not recommended for statutory listing, it is a significant theatre building with links to important theatre architects and performers and the Shopping Centre is generally referred to as one of the first enclosed shopping centres in the UK.

West site

718. The desk-based assessment also identified the possibility of there being a post-medieval burial ground on the west site, and officers requested that trenches be dug before the granting of any planning permission. However, following the submission of additional information it is recommended that this matter be addressed by way of conditions.
719. In accordance with the council's adopted Planning Obligations and CIL SPD a contribution of £11,171 towards archaeological mitigation is required, and a clause to secure this has been included in the draft s106 agreement. This should be split across both sites, with a requirement for £5,585.50 for each site.

Completed and operational development

720. The operational and completed development would not involve any ground disturbance, therefore there would be no additional archaeological effects.

Conclusion to archaeology

721. Subject to conditions and a planning obligation it is concluded that the proposed development would comply with the development plan in relation to archaeology.

Wind microclimate

722. This issue is covered in chapter 14 of the ES which considers the likely wind conditions as a result of the proposed development, and the suitability of those conditions for pedestrian comfort and cyclist safety. Measurements were taken at 452 locations on and around the site. Concerns have been raised by the Metropolitan Tabernacle that wind microclimate has not been adequately assessed in relation to their building. Whilst the congregation use the main entrance from Elephant and Castle, the day-to-day entrance is at the north-west corner of the building accessed by a pathway which sits between the Tabernacle and the existing LCC building.
723. This section considers the impact of the proposed development with the existing surrounding buildings in place, and mitigation measures incorporated. Separate testing has been undertaken to consider the cumulative scenario with the proposed development in place, and all buildings consented / under construction having been completed, and this is set out in the EIA section of this report under cumulative impacts.

Demolition and construction

724. The ES advises that during demolition and construction and with mitigation for the completed development in place before site hoarding is removed impacts would be insignificant and from temporary minor adverse to beneficial. As the assessment identifies the impacts are insignificant to minor adverse this indicates that mitigation is unlikely to be needed. Should areas that are temporarily exposed thought to be at additional risk, extra measures such as restricting access should be considered through the construction management plan.

Completed development

725. The ES predicts that for thoroughfares, the cycle superhighway, at bus stops and within proposed amenity space wind conditions would be acceptable, with impacts ranging from insignificant, and insignificant to moderate beneficial. This is on the basis that mitigation is in place including landscaping and tree planting, solid bus shelters and vertical baffles / screens; limited details of the baffles and screens have been provided, therefore a condition is recommended. At building entrances the ES predicts that with mitigation in place through recessing the entrances, impacts would be minor adverse to minor beneficial. The ES predicts that wind microclimate would have an acceptable impact upon cyclists, subject to screening being installed along areas of the cycle superhighway.
726. As stated, the council has appointed an independent consultant to review the wind microclimate information. The consultant has advised that a number of receptors

could experience some minor adverse effects, including potential impacts upon frail and elderly pedestrians, and that further mitigation is required. Areas where this could potentially occur include at the junction of Elephant Road and Walworth Road, close to the Metropolis Apartments on Oswin Street, and near the northern entrance to Pastor Street. Whilst predicted wind speeds are considered to be safe for cyclists, there remains a possibility, due to the limitations of the measurement locations in the wind tunnel testing, of cyclists being affected by gusts of wind, which could be addressed through additional mitigation. It is therefore recommended that the number screens for the cycle superhighway are increased along the stretch that goes from Newington Butts into St Georges Road. Currently, only three screens are proposed and there is a risk that these current screens would not provide sufficient sheltering from the strongest winds.

- 727. A condition has been included in the draft recommendation to secure the proposed and additional mitigation, and it is noted that any screens along the cycle superhighway are likely to require consent from TfL as Highway Authority. A number of new trees are proposed in the public realm which could be positioned to act as wind-breaks.
- 728. In response to concerns raised by the Metropolitan Tabernacle, the applicant has submitted some additional commentary advising receptors around the day-to-day entrance to the Tabernacle would fall within acceptable limits. However, the council's consultant has advised that two additional receptors should be tested, one at the entrance and one underneath the archway leading to the passageway to the northern side of the Tabernacle and this has been included in the draft condition.
- 729. The Metropolitan Tabernacle has commented that this issue has not been fully addressed, and question whether a condition would be sufficient if tower 3 has already been given planning permission. Any additional mitigation required could include measures installed on tower W3 or within the landscaping. A condition in the draft recommendation requires additional testing and details of any additional mitigation required to be submitted prior to the commencement of above grade works.

Conclusion to wind microclimate

- 730. Subject to conditions it is concluded that the proposal would comply with the development plan in relation to wind microclimate.

Health Impact Assessment

- 731. Policy 3.2 of the London Plan 'Improving health and addressing health inequalities' (c) states that 'The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA).' Improving health is a cross-cutting theme through many of Southwark's policies, particularly core strategy policies 2 (transport), 7 (family housing) and 11 (open spaces).
- 732. A Health Impact Assessment has been submitted with the application which considers the impact of the proposed development upon health and wellbeing. It concludes that the proposal would have mostly positive effects, and some uncertain effects because of uncertainty over relocation support and the employment policies of potential contractors need to be concluded.
- 733. A draft local business support and relocation strategy has subsequently been

submitted setting out measures to assist affected businesses. The employment policies of potential contractors are not known at this stage, but as set out in the planning obligations section of this report, jobs and training for unemployed Southwark residents would be secured through the s106 agreement.

734. The council's Public Health Team (PHT) has reviewed the HIA and advised that the affordable housing proposed would impact positively on health, and that taking economics into account, all segments of the community including older people who are not in full employment should be able to qualify as a tenant. The affordable housing which would be at rent levels equivalent to social rent would be available to all eligible segments of the community, including older people and there would be no requirement for tenants to be economically active. For the other discount market rent levels these would be available on the relevant intermediate housing list which is anticipated to be in place within the next 12 months. The PHT has commented that three year tenancies would be better than what is generally currently offered in the private rented sector, but would be less secure than social housing managed by the council and Housing Associations. PHT has requested further clarification on whether the tenancies could be renewed, and the criteria for doing so. As set out in the affordable housing section of this report, the three year tenancies could be renewed.
735. PHT has further commented that the loss of and lack of any affordable retail on site is such that the proposed shopping centre would not be as reflective of the diverse local community than at present, and that the applicant's Equalities Statement identifies a potential negative effect on BAME business owners and older business owners. However, affordable retail would now be provided on site, and a contribution towards off-site provision would be provided. Overall the health impacts of the proposed development are considered to be acceptable.

Conclusion to health impact assessment

736. Subject to conditions and planning obligations it is concluded that the proposal would comply with the development plan in relation to health.

Ecology

737. Policy 7.19 of the London Plan 'Biodiversity and access to nature' requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity wherever possible. Saved policy 3.28 of the Southwark Plan states that the Local Planning Authority will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, and will require an ecological assessment where relevant.
738. As part of the EIA scoping application an extended phase 1 habitat survey was undertaken, together with external building inspections for roosting bats, ground based tree inspections for roosting bats, an evening emergence bat survey, and black redstart survey. They demonstrated that the existing buildings on the site and areas of hard-standing are of negligible to low potential for roosting bats, and overall the site had negligible ecological value, with only the existing trees and an area of brown roof contributing to its ecological value. The survey concluded that the proposed development would not result in any adverse ecological effects, and it was agreed that ecology could be scoped out of the Environmental Statement.
739. The application has been reviewed by the council's Ecology Officer who has advised

that as the bat activity survey which was undertaken is now more than two years old, it should be re-done. This has been undertaken and no bats were recorded.

740. The site is large and has potential to offer significant ecological enhancements through new planting in the public realm and communal gardens. A number of conditions are recommended to enhance the ecological value of the development, including the inclusion of nesting boxes / bricks, details of the green wall on the west site, and for the submission of an ecological management plan. Only plot E1 is shown as having a green roof, and a condition requiring an additional green roof to one of the buildings on the west site is recommended.

Conclusion to ecology

741. Subject to conditions it is concluded that the proposal would comply with the development plan in relation to ecology.

Socio-economic impacts

742. The predicted socio-economic impacts of the proposed development are set out in chapter 7 of the ES. It advises that at present it is estimated that the existing development supports 1,418 full-time equivalent jobs. The majority of these (45%) are based in the office space in Hannibal House, followed by 32% at the LCC, 21% from retail and food / drink uses, and 1% from leisure uses. The proposal would deliver New Homes Bonus revenues of £9 million over 6 years, of which two thirds would go to the council and the remaining third to the GLA. It would also generate approximately £1.5m in council Tax revenue per year.

Demolition and construction

743. The ES identifies the adverse effects arising from the loss of the existing uses on the site during construction, some of which could be reduced through a relocation / support package for existing businesses, and others which could not including the loss of leisure floorspace during construction. There are alternative shopping facilities including for affordable food along Walworth Road and East Street Market. With regard to leisure, there are no other bowling or bingo facilities within close proximity to the site, although for retail, the shops and services along Walworth Road are in close proximity.
744. The ES predicts that for business and leisure floorspace there would be temporary, adverse effects of minor significance at a local level, which would be insignificant at a district level. The ES predicts that loss of community floorspace, owing to the possible location of some of these services, would be insignificant at a local and district level.
745. The ES estimates that there would be approximately 1,230 construction jobs per year for the 10 year build programme, with a predicted increase in the level of expenditure locally from construction workers. As stated clauses would be included in the s106 agreement to secure jobs, training and construction industry apprenticeships for unemployed Southwark residents, and it is recommended that this includes measures to ensure that residents sharing protected characteristics can fully share in these opportunities. The ES predicts that construction jobs would result in temporary, beneficial effects of moderate significance at both a local and district level.

Completed development

746. The completed development would positively contribute towards meeting local and regional housing targets and would create generate between 1,813 and 1,990 gross new jobs, depending on the exact nature of the commercial uses which would ultimately come forward; this would be an increase of between 395 and 572 and again, measures to secure jobs for unemployed borough residents through the s106 agreement are recommended. Whilst there would be a reduction in leisure floorspace, there would be increases in retail, education and residential. The ES acknowledges that the new population would result in further demand for education and health provision, but a substantial amount of CIL would be required which could be used to deliver additional facilities.
747. The ES notes that there is a shortage of open space both within the opportunity area and across the borough, and that the proposed development would result in additional pressure on existing open spaces. The ES therefore recommends a s106 contribution to improve or expand existing open space. It is noted however, that the ES does not take into account Elephant Park which is being delivered on the redeveloped Heygate Estate, the first phase of which is now open. A s106 contribution would be secured to mitigate the shortfall in childrens' play space on the west site, and this would be put towards local provision.
748. The ES advises that the proposed development could potentially contribute £1.6 million annually within the opportunity area and £3.6 million annually within the borough. The socio-economic benefits arising from the development are concluded to belong-term, beneficial, and of moderate and substantial significance at both local and district levels and would add to the overall regeneration benefits arising from the scheme. Officers concur with this conclusion.

Conclusion to socio-economic impacts

749. It is concluded that subject to s106 obligations the proposal would comply with the development plan in relation to socio-economic impacts.

Planning obligations (S.106 undertaking or agreement)

750. Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the council's adopted Planning Obligations and Community Infrastructure Levy SPD. A s106 agreement is currently being drafted. Given that TfL own some of the land which the development would be constructed on, they would be party to the agreement. Clauses to secure the following should be included.

East site

751. The following financial obligations should be secured through the s106 agreement:

Archaeology - £5,585.50
 Carbon Offset - £1,213,473
 Tree Shepherd funding £122,825 (the total budget is £145,900 but £23,075 has already been paid)
 Relocation fund £634,700
 Corsica Studios sound proofing £125,000
 Total £2,101,583.50
 2% monitoring fee £42,031.67
 Grand total £2,143,615.17

752. In addition to the above it is recommended that an affordable housing monitoring fee be secured through the s106 to monitor the complex affordable housing obligations.

Non-financial obligations

753. Demolition and construction environmental management plans;
 Clauses to secure the delivery of the shopping centre and leisure space before a certain proportion of the residential space can be occupied;
Terms to secure first right of refusal for some of the leisure space to a bingo operator (east or west site);
 Terms to secure the affordable housing units, including review mechanisms and restricting a proportion of the private units until / unless the affordable units have been completed;
 Clauses to maintain the housing as PRS for a minimum period or to pay a clawback contribution;
 Clauses to secure on-site affordable retail;
Clauses to require the developer to deliver a temporary retail facility in Castle Square at affordable rents in line with the standard of accommodation provided, and to be offered to existing traders in priority, subject to first obtaining planning permission and a land interest;
 Database of relocation opportunities for affected businesses;
 Clauses to secure a community use agreement including events / activities at the proposed leisure and education building relevant to people from BAME backgrounds and older people;
 Employment in during construction and in the completed development provisions, including measures to ensure that those sharing protected characteristics can fully engage with these opportunities;
 Clauses to secure the delivery of the station box for the Northern Line ticket hall;
 Clauses to secure a new pedestrian route from the Court through to Elephant Road, either as shown on the plans and including environmental improvements to the existing arches which give access to the shopping centre or an alternative route if that cannot be delivered if they are retained;
 Delivery of highway works and public realm, including management;
 Landscaping to communal gardens including management;
 Delivery of way-finding and signage;
 Provisions for public access through the site;
 Cycle hire provisions;
 Delivery and servicing management plan;
 A scheme of environmental improvements around Elephant and Castle Railway Station;
 Tree planting strategy.

West site financial obligations

754. Archaeology - £5,585.50
 Carbon Offset - £1,021,127
 Childrens' playspace £117,780
 Total: £1,144,492.50
 2% monitoring fee: £22,889.85
 Grand total: £1,167,382.35
755. An affordable housing monitoring fee should also be secured through the s106 agreement.

West site non-financial obligations

756. Demolition and construction environmental management plans;
 Completion of the new LCC building before the existing building can be demolished;
 Provision of the cultural venue before occupation of a certain proportion of the residential, and operational management plan for the cultural venue;
Terms to secure first right of refusal for some of the leisure space to a bingo operator (east or west site);
 On-site affordable retail;
 Provision of up to 10% affordable B1 space;
 Terms to secure the affordable housing units, including review mechanisms and restricting a proportion of the private units until / unless the affordable units have been completed;
 Clauses to maintain the housing as PRS for a minimum period or to pay a clawback contribution;
 Employment in during construction and in the completed development provisions, including measures to ensure that those sharing protected characteristics can fully engage with these opportunities;
 Delivery of highway works and public realm, including management;
 Landscaping to communal gardens including management;
 Provisions for public access through the site;
 Delivery of way-finding and signage;
 Cycle hire provisions;
 Delivery and servicing management plan;
 Tree planting strategy.
757. In the event that a satisfactory legal agreement has not been entered into by 18th December 2018 it is recommended that the Director of Planning be authorised to refuse planning permission, if appropriate, for the following reason:

The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2016) and the Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and Borough community infrastructure levy (CIL)

758. Section 143 of the Localism Act states that any financial contribution received as 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.

759. Concerns have been raised regarding pressure on local services as a result of the proposal. 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 the borough.
760. In this instance a Mayoral CIL payment (pre- affordable housing relief) of £3,762,975 and a Southwark CIL payment of £15,804,382 would be required.

Statement of Community Involvement

761. A Statement of Community Involvement (CSI) has been submitted, setting out the consultation undertaken by the applicant prior to the submission of the planning application.
762. The SCI advises that prior to the submission of the planning application, the applicant held 132 meetings with locally elected politicians, local community groups, local residents and businesses, and statutory bodies. Local groups meetings were held with include:

Latin Elephant;
The Walworth Society;
Plaza Latina/Carnival del Pueblo;
Southwark Cyclists;
Southwark Disablement Association;
Southwark Pensioners Centre;
Tenants and Residents Associations at Perronet House, Meadow Row, Lawson Estate, Hayles, Albert Barnes House, Draper and Newington TRAs;
Rockingham Community Association;
West Square Residents' Association;
Residents at Strata, Metro Central Heights, Oswin Street,
Metropolitan Tabernacle.

763. 50 meetings were held with tenants of the shopping centre; this was individual meetings with tenants as opposed to group meetings.

Consultation was undertaken in the following ways

764. A website was launched in July 2015 to provide information on the proposed development.
765. Holding/attending a series of 132 one-to-one meetings/public meetings between January 2014 and July 2016 to receive feedback from locally elected political representatives, local community groups and amenity organisations, and local businesses and landowners located near to the site.
766. Holding a series of drop-in sessions from June to September 2014 attended by 296 people at the shopping centre and other venues to allow users of the Existing Centre and interested parties to provide feedback through a questionnaire about what people like and dislike about the existing shopping centre and to help fashion the design process for its redevelopment.

767. Holding a three three-day public exhibition on July 2015 to publicise the initial plans for the proposed development which was attended by 839 people. This was publicised by writing to all residences and businesses within the opportunity area, of which there are approximately 8,880.
768. Holding a series of public workshops in November 2015 with elected political representatives, local community groups and amenity organisations and local businesses and landowners located around the site, including breakout groups chaired by independent facilitators on the themes of putting the pedestrian at the heart of the Elephant, the new town centre, and integration with London College of Communication.
769. Holding a three-day public exhibition in May 2016 to publicise the proposed development which was attended by 773 people.

Feedback received through questionnaires was as follows

770. The CSI advises that 83.4% of respondents at the second public exhibition supported the development proposals, and the CSI identifies the following broad themes:

More distinctive architecture required, particularly along Newington Butts and Walworth Road;
 Overshadowing, loss of light and the creation of wind tunnels;
 Pedestrian routes were identified as a key feature of the design, and attendees representing the disabled community were supportive of these elements of the design;
 Retail meanwhile uses – concerns about what would happen when the shopping centre is demolished and creating new retail opportunities in the interim period;
 Concerns about impacts upon existing traders and whether they would be priced out of the new development;
 The provision of rental residential accommodation with 3 year tenancies was supported;
 There were questions around the exact nature of the affordable housing, whether Southwark residents would benefit, what the discounted rents would be and the overall quantum of affordable housing;
 - Support for improved cultural facilities, particularly the cinema, cultural venue and gallery space in the proposed LCC building. Concerns were raised regarding the loss of the building containing the Coronet Theatre, owing to the architectural features therein.

771. The SCI advises that five main changes were made in response to pre-application consultation:

Relocation of the Northern Line ticket hall to better relate to the Peninsula;
 Changes to the Court to allow for better circulation at first floor level;
 Changes to the variety of the architecture;
 Changes to the service ramp / access;
 Introduction of the proposed cultural venue.

772. *The applicant has submitted an updated Statement of Community Involvement setting out what consultation with stakeholders has taken place since the application was deferred. It details how 10,000 flyers were distributed to local residents and businesses providing an update on the application, and press releases made to various media outlets.*

773. *A Community Engagement Centre has been set up in the shopping centre as a single point of contact with the applicant, and to advise on potential relocation opportunities that are and which will become available in the immediate area and the wider opportunity area. The centre opened on 12th February and initially operated between the hours of 10am to 4pm Monday to Friday and 11am to 8pm on Wednesdays. Owing to limited attendance these hours were reduced to midday to 3pm Monday to Friday and midday to 6pm on Wednesdays, based on the most popular hours from recorded attendance. The centre will remain open until the next planning committee meeting, and is manned by members of the applicant's project team including representatives from Delancey and LCC, including a Spanish speaker. There have been around 77 visitors per week to the centre since it opened.*
774. *A public exhibition was held at the shopping centre from 13th-16th and 19th-23rd February 2018.*
775. *The developer has held meetings with the following groups / representatives:*
- Walworth Society and West Square Residents on 8 February 2018;*
Cathedrals Ward Councillors on 12 February 2018;
Walworth Society on 14 February 2018;
Latin Elephant on 22 February 2018;
UAL staff and students on 22 February 2018;
Newington Ward Councillors on 2 March 2018 (telephone call);
Chaucer Ward Councillors on 2 March 2018;
Borough, Bankside and Walworth Community Council on 2 March 2018 (telephone call);
Castle Place project Lamlash Gardens on the week commencing 5 March 2018;
Rockingham Estate TRA on 5 March 2018;
Crossway Church on 9 March 2018;
East Walworth Ward Councillors on 12 March 2018;
35% Campaign on 13 March 2018;
Cathedrals Ward Councillors on 13 March 2018;
West Square Residents on 15 March 2018;
Borough, Bankside and Walworth Community Council on 19 March 2018;
Faraday Ward Community Council on 19 March 2018;
Newington Ward Community Council on 19 March 2018;
St Peter's Church on 19 March 2018;
Southwark Chamber of Commerce on 5 April 2018;
St George's Ward Councillors on 18 May 2018;
Perronet House residents on 22 May 2018.
776. *The updated SCI advises that meetings have also been offered to Southwark Pensioners, Elliot and Hayles TRA, Oswin Street residents and Draper House Residents' Association and a response is awaited.*
777. *A website has been set up and an email inbox made available for residents to ask questions or raise concerns, and a Twitter account has been set up.*

Trader engagement

778. *Shopping centre tenant information meetings were held on 26th February and 1st March at the shopping centre, with memos sent to tenants in advance. The first meeting was attended by 11 retailers and 4 market stall holders, but there were no*

attendees at the second meeting.

779. *Trader tours of relocation opportunities were held on 21st and 22nd March, 5th April and 17th May and were attended by 50 retailers. The tours included visits to St George's Pharmacy in Perronet House, to the Perronet House garages, Castle Square, Elephant One, a briefing by Lendlease on opportunities coming forward on Elephant Park, East Street, Manor Place Depot and a visit to Latin Bites by La Bodeguita which is an affordable retail unit in a new development on Walworth Road.*
780. *Two newsletters have been issued to traders, in February and May and tenant memos are issued with key updates.*

Trader Panels

781. *The updated SCI advises that if there is a resolution to grant planning permission, a trader panel would be set up to oversee the delivery of the relocation strategy for qualifying traders and businesses. Likely responsibilities for the panel would include:*

- help for qualifying traders and businesses affected by the proposal;*
- liaising with Delancey to update the strategy as necessary;*
- working to seek to minimise adverse impacts upon traders and maximise opportunities for them;*
- to work with the council and Tree Shepherd on the bidding process of applying for and allocation of affordable retail units, and the distribution and timing of payments from the relocation fund;*
- working to deliver the Castle Square temporary retail space;*
- to input into the clustering of affordable retail units;*
- Panel likely to meet monthly from July 2018 until 6 months after the east site development has been completed.*

No formal approaches have been made to appoint panel members at present, although the draft SCI advises that the panel could comprise:

- Two ward councillors;*
- A Regeneration Officer from the council;*
- 2 x traders;*
- Latin Elephant;*
- Representatives from Delancey.*

Feedback

782. *The updated SCI advises that feedback submitted to the consultation email inbox and Community Engagement Centre has been 40% positive, 39% neutral and 21% negative. Feedback comprised:*
- Support for additional retail and clustering of affordable retail units, but do not think there would be enough affordable retail and queried whether tenants would have a right to return;*
 - Majority of traders support the Castle Square proposals, but some believe communication with traders regarding relocation options could be improved;*
 - The majority of respondents support the design of the proposal, but 4% have concerns over its density and height;*
 - 9% of respondents believe the proposed development would contribute towards the gentrification of the area;*
 - 11% of respondents requested that the proposals protect the existing community,*

with specific concerns raised regarding the bingo hall, the proposed leisure building and the Elephant and Castle statue;

- The consultation exercise was described as 'informative' and that the applicant has addressed concerns throughout the application process and amended the scheme accordingly;*
- The Community Engagement Centre is supported.*
- Some respondents believe more social rented housing should be provided, including 18% of visitors to the Community Engagement Centre.*
- Some respondents questioned the committed and potential increases in affordable housing, specifically social rented housing.*
- 79% of respondents supported the scheme or made neutral comments.*
- The majority of respondents believed the proposal would be good for the area.*

783. Applicant's response to consultation feedback:

- 10% affordable retail provided;*
- Relocation fund of £634,700*
- Proposal for temporary retail space on Castle Square;*
- First refusal of a proportion of leisure space to a bingo operator;*
- The applicant is developing a feasibility study for a dedicated social and community space for the Latin American Community.*
- Lower floors of the education building designed to facilitate public use.*
- Traditional social rented units proposed, and the number increased from 33, to 74, and now to 116.*
- Developer to undertake a CZ review in relation to the west site.*

Other matters

Fire safety

784. Concerns have been raised during public consultation on the application that fire safety must be taken into account, and is too important an issue to be left to the Building Regulations. Whilst this is noted, fire safety continues to be a matter for the Building Regulations and a government-led review is being undertaken as to their adequacy in this respect. The fire safety design of the proposal would be considered by the Building Regulations service provider and the local fire authority, referencing current tall building design guidance.

Conclusion on planning issues

785. The heart of the Elephant and Castle Opportunity Area is undergoing a period of significant transformation, with many key sites within the opportunity core area having already been completed or are under construction. To the north of the site there is a resolution to grant planning permission for a new mixed use development at Skipton House including retail, office, cultural and residential space; to the east of the site there is a mixed-use development at Elephant One, and significant new housing, a new park and commercial uses are being delivered on the redeveloped Heygate Estate. The Strata Tower is to the south of the site which was completed in 2010 and signalled the beginning of the regeneration of the area. To the west are the recently completed One the Elephant development and Castle Centre, and the 360 Tower is currently being constructed further west again. The application site is the last piece in the puzzle, with the east site particularly pivotal given its location at a transport hub.
786. The application has been assessed against the relevant policies in development plan. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning

applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan, the Core Strategy, and the Saved Southwark Plan.

787. There are a number of areas where the proposed development would not conform with the development plan. The proposal would exceed the density threshold set out in the Core Strategy, and aspects of the affordable housing proposal would not be in conformity with the development plan. At 35% the proposal would comply with the minimum affordable housing requirement, but the proposed tenure split would not comply with the Saved Southwark Plan, the Core Strategy or the London Plan. However, as indicated in the assessment above officers are satisfied that the maximum reasonable affordable housing would be provided when viability is considered.
788. The proposal would result in significant adverse impacts to a number of properties in relation to daylight and sunlight, particularly those on Oswin Street, Hayles Building and Metro Central Heights. This would be contrary to the provisions of the development plan which seeks to ensure a good standard of amenity for neighbouring occupiers. It is noted however, that overall, 76% of the windows tested would comply with the BRE guidance in relation to Vertical Sky Component, 90% for No Sky Line and 84% in relation to sunlight.
789. Areas where the proposed development would comply with the development plan include land uses. The proposal would deliver increases in A and D class floorspace, with a vibrant and lively mix of uses proposed which would be appropriate to the town centre and CAZ location, and would help to meet the London Plan and Core Strategy requirements to strengthen the role of Elephant and Castle as a major town centre. It would include transport infrastructure in the form of a new station box to facilitate the delivery of a new ticket hall for the Northern Line, a key planning objective for the opportunity area. The delivery of a significant quantum of new housing would comply with the development plan, with the London Plan setting a target of a minimum of 5,000 new homes within the opportunity area.
790. A number of compromises would have to be made in relation to transport, but subject to mitigation through conditions and s106 obligations, the proposal is considered to be satisfactory and in overall conformity with the development plan in this respect.
791. The proposal would also comply with the development plan in relation to mix of dwellings including a policy compliant amount of 3+ bed units, wheelchair accessible housing, quality of accommodation, trees and landscaping, air quality and health impact, and subject to conditions, would comply with the development plan in relation to noise and vibration, ground conditions and contamination, water resources and flood risk, archaeology, wind microclimate, ecology, and socio-economic impacts. Subject to completion of a s106 agreement, the proposal would comply with the development plan in relation to sustainable development implications.
792. It is not necessarily realistic to expect that a proposal of this scale and complexity will satisfy every component of the development plan. Officers are satisfied that the proposal is overall in conformity with the development plan.
793. Given the duty in the Planning (Listed Building and Conservation Areas) Act (1990) to have special regard to the importance of preserving and enhancing the special historic and architectural interest of listed buildings, it is necessary to place substantial weight on the harm to the listed building which has been identified. Having reviewed the

application material together with consultation responses received, officers conclude that there would be harm to the setting of the Metropolitan Tabernacle, the front façade of which is listed. Notwithstanding the substantial weight given to it, officers consider that this harm would be outweighed by the significant public benefits which would arise from the proposal.

794. There would also be some adverse equality impacts in relation to age and race, both of which are protected characteristics under the 2010 Equality Act. Although it is considered that the mitigation proposed would be sufficient, reasonable and would go some way to mitigating potential impacts, the mitigation would not be enough to eradicate the adverse impacts. Some businesses may cease trading before the shopping centre closes or relocate outside the opportunity area or borough, and although being offered first refusal of some of the leisure space, there is no guarantee that a bingo operator would return to the site. Section 149 of the Equality Act places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers, and Members must be mindful of this duty in determining this application.
795. The concerns in respect of equality impacts and adverse impact on the listed Metropolitan Tabernacle do not alter officers' assessment that overall the proposal complies with the development plan.
796. The proposal would deliver a number of key objectives set out in the Elephant and Castle SPD including excellent shopping facilities, new leisure floorspace and a cultural venue (albeit that there is a net reduction in leisure floorspace), and increased educational floorspace, helping to strengthen the role of this area as Southwark's university quarter.
797. Overall the proposal would make a substantial and welcome contribution towards delivering the strategic and local objectives for the Elephant and Castle Opportunity Area. Given the significant public benefits which would arise from the proposal and its overall conformity with the development plan, it is recommended that planning permission be granted, subject to conditions and following the completion of a s106 agreement.

Community impact statement

798. 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.
 - b) The following issues relevant to particular communities/groups likely to be affected by the proposal have been identified above.
 - c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above. Specific actions to ameliorate these implications are set out above.

Consultations

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

Consultation replies

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

Summary of consultation responses

Environmental Protection Team

801. Approval with conditions. EPT have acknowledged the potential for disruption during demolition /construction and that control mechanisms identified are appropriate. A more comprehensive range of mitigation measures would need to be set out in demolition and construction management plans prior to the commencement of those works.

Flood and Drainage Team

802. Whilst an assessment of the risk of flooding from groundwater has been undertaken, given the size of the proposed basements, not enough detail is provided. Full basement impact assessment (BIA) is required, which should include more details of risk of impeding groundwater flows and levels, and the risk of flooding from surface water. Principles of the drainage strategy are acceptable, but further details are required (condition recommended).
803. Subsequent comments - Have reviewed the BIA, and are generally satisfied with the information provided. However, as the BIA states that 'specific site investigations shall be procured in RIBA stage 3. The general ground conditions and groundwater conditions shall be investigated' a condition is recommended

Waste Management

804. Minor modifications to proposed waste management strategy required.

Emergency Planning and Resilience Officer

805. Informative recommended that if any UXO anomalies are detected during survey work, the council and the Police must be informed.

Public Health Team

806. Affordable housing and 3 year tenancies welcomed. People not in full employment must be able to qualify as a tenant. Tenancies less secure than social rented housing. Further information required about whether the tenancies could be renewed and criteria for doing so. Lack of affordable retail is disappointing given the ethnic mix of retailers in the area and would result in a less vibrant and diverse mix of uses. This raises equalities issues. Mitigation is required.

Highways Development Management

807. Detailed comments provided on the scope and specification of highways works on Southwark roads. This will be referenced in the s106 agreement and delivered via the s278 process.

Ecology Officer

808. Updated bat survey required and conditions recommended. Subsequently confirmed that updated bat survey is acceptable.

Councillors Lury, Merrill and Seaton (East Walworth Ward)

809. Not opposed to the regeneration of the Elephant and Castle, and recognise the need for the replacement of the current shopping centre, but have concerns regarding the planning application which is due to go to committee on 18th December. Do not object in principle to the proposed design for the new shopping centre, but have concerns regarding the following:

Delivery of affordable housing. Delancey proposing a 36% affordable PRS housing development but there will only be 3% homes let at council social rents. Conversely, if you earn £80,000 it is possible to qualify for an affordable PRS flat, based on the current application. On a development of nearly 1000 homes, this equates to 33 properties at council social rents.

Delivery of affordable retail units. Delancey are policy compliant on the LCC site, offering 10% affordable retail, but the proposal for the current shopping centre site is 5%, with the other 5% provided through a payment in lieu to redevelopment the garages under Perronet House for the market traders to move to. Do not believe that this renders the application compliant, and it is far from certain that this proposed move can happen.

Equalities impact. Two protected groups, BAME individuals, and older people, are discriminated against with the removal of the bingo hall from the shopping centre. Space for a bingo hall should be re- provided within the new shopping centre development.

Breaking up existing communities. As Councillors will have heard at Council Assembly on 29 November 2017, the traders at Elephant and Castle Shopping Centre do not feel that they are being properly consulted about their futures. The current plans do not propose moving traders in a cluster, keeping the community together.

Legal enforceability. Is commendable that Southwark Council is looking to lead on the development of PRS schemes, but there is no Southwark Council agreed policy. The policy is currently being developed, and will form part of the new Southwark Plan which will be agreed towards the end of 2018. This application will likely help to set the policy going forward, and the current plans do not deliver what we want to achieve as a council. Are also concerned that with no existing policy, there may be implications about the legal enforcement of any proposal made by Delancey and passed by a planning committee.

810. Want to see regeneration at Elephant and Castle that delivers for those that live and work in the area, as well as those that we want to see moving into the area. However, do not believe that the current proposals are adequate to fulfil these criteria. Request that this application does not get approval until these outstanding matters are brought in line with Southwark's policies, and the detailed paper work for the PRS enforcement and traders compensation is fully completed so that the committee can take a judgement clearly knowing all the implications.

Representation from Councillor Flemming (Faraday Ward)

811. Object to the application for the following reasons:

- Proposal not compliant with the spirit or letter of the Council's planning policies;
- Shopping centre an important hub for the Walworth community including Latin American and Iberian communities. Any development must be carried out with community support and provide an improvement for the community – current application does not do this;
- Opaque / speculative proposals for relocating existing traders which would isolate them from the economic benefits of the scheme, away from passing trade;
- Proposal fails to create a sustainable future for affected businesses;
- Would not provide 10% affordable retail space or guarantee space for existing businesses;
- No re-provision of the bingo hall, an important cultural asset, particularly for older people;
- Adverse equality impacts;
- Low provision of social rented units and affordable housing offer would adversely impact upon women and people from BAME backgrounds;
- Support objections made by other Councillors.

Representation from Councillor Eastham (Chaucer Ward)

812. Object to the application for the following reasons:
- No opposition to the regeneration of the area but application does not meet the high standards the Council sets itself in planning policies. More effort should be made to make it policy compliant. Object on the following grounds:
 - Only 3% social rented homes would be provided, contrary to policy;
 - Concerned about PRS homes, and the proposal would not comply with the Council's emerging PRS policy;
 - Not acceptable to provide 5% affordable retail space in an underground area opposite the shopping centre. It is not within the site and shoppers would be attracted to the site not Perronet House;
 - There must be a requirement for a bingo hall in the new development owing to the impact upon protected groups – other councils have made similar requests where protected groups are affected;
 - Breaking up of the Latin American community.

Representation from Councillor Dennis (Chaucer Ward)

813. Object to the application on the following grounds:
- Not compliant with the council's affordable housing policies;
 - Overcrowding;
 - Lack of suitable housing for families and lack of social rented housing;
 - The scheme only provides 40% (of the 35% affordable housing) at London Living Rent or below;
 - 60% of the affordable housing would be aimed at households with relatively high incomes for individuals up to £80k and households up to £90k, way above the average for Southwark;
 - The NSP notes that only 8% of Southwark residents have a household income above £90k and 33% have an income of less than £20k;
 - Proposal would not comply with tenure split in emerging PRS policy;
 - Further information needed on business relocation strategy. Not clear if the 5% affordable retail contribution is sufficient to make the proposal policy compliant;
 - Condition required to secure re-provision of the bingo, as highlighted in the equalities impact assessment.

Representation from Councillor Linforth-Hall (Cathedrals Ward)

814. Object to the application on the following grounds:
- Not opposed to regeneration and would like to see development of the area, the proposals for the west site contravene planning policies;
 - Scale and massing would have a severe impact on the surrounding streets which are part of a conservation area and next to the listed Metropolitan Tabernacle;
 - Profound impact upon the residential amenity of residents in Cathedrals ward, particularly loss of daylight / sunlight, light pollution, overshadowing, privacy, construction / servicing traffic;
 - Application concludes there would be significant adverse impacts on daylight, sunlight and overshadowing to Oswin Street and Hayles Buildings;
 - Affordable housing mix not compliant with adopted or emerging policy;
 - Shopping centre traders have been given no concrete undertaking regarding their relocation and no assurance of being kept together as a cluster;
 - The use of Perronet House garages for retail hangs on decisions by TfL regarding the Bakerloo Line extension and has been objected to by residents;
 - Traders given insufficient time to react to the recent proposed compensation package and relocation suggestions;
 - Strategy does not provide for the wishes of BAME traders to remain clustered during relocation and in returning to the development as evidenced in a document produced by Latin Elephant;
 - Traders have not been given assurances regarding the affordability of space in the new development.

Additional representation from Councillor Linforth-Hall (Cathedrals Ward)

815. Officer report demonstrates significant adverse impacts upon daylight and sunlight to neighbouring properties, particularly Oswin Street and West Square.
- Impact of losing bingo hall on older people.
 - The council's viability advisors consider that more affordable housing could be provided. Is unacceptable to rely on review mechanisms to secure this . Details of review mechanisms should be agreed before committee and the final s106 approved by committee.
 - Officer report advises Members to give negative equality impacts serious consideration when determining the application. Report does not address equality implications that a Compulsory Purchase Order (CPO) on the bingo hall would entail, as demonstrated by the Aylesbury CPO decision.

Representation from Councillor Kerslake (Newington Ward)

816. Application discussed at the Borough, Bankside and Walworth Community Council meeting on 9th January 2018. Would like this treated as an objection to the application on the following grounds:
- Affordable housing – although 35% would be provided, less than 50% would be social rent equivalents, contrary to policy. Review mechanisms would not be guaranteed to improve this.
 - Management of the social rent equivalent units – the applicant is not a registered affordable housing provider, a 100% PRS scheme would set an unacceptable precedent, question what happens at the end of three year tenancies, and question why more social rent equivalent units would not be viable.
 - Bingo hall – concerns raised by the operator as it was not clear where the hall might

move in the interim and long term. Facility used by many hundreds, and sometimes thousands of people per week, and would have a negative impact upon older people and BME groups.

- Impact upon traders and their families, including the Latin American business community. No confidence in the development to date. Traders felt insecure about and unconvinced by current plans, including Perronet House proposals. 10% affordable retail space would not re-provide space for all of the traders which would need it.
- Unless the above issues are addressed the council should delay approval of the application until a fairer deal can be reached.
- Affordable housing must comply with the council's policy for social rented units;
- Applicant should sign up to fair terms on how the PRS would be managed and transfer the social rented units to the council if they cannot be managed by a housing association or equivalent. Social rented tenancies should be for life.
- The s106 agreement should come back to the Planning Committee to be publically scrutinised and improved by political representatives.
- A fair deal for traders. Trader panel should be established this week to involve traders at every level, and traders with long leases should have a right to return.
- The bingo hall is a thriving local business that brings people together and helps them have fun. A better plan for its long term future must be reached.
- A great scheme could help Elephant and Castle improve and thrive in the future. There is one opportunity to get this right for current and future residents and the council must secure a better deal.

Greater London Authority (GLA) stage 1 report

817. Principle of development – This mixed use scheme positively responds to strategic objectives for the regeneration of the Elephant and Castle Opportunity Area;
- Mix of uses – The mix of proposed residential, retail, leisure and educational uses is strongly supported for this CAZ location. The applicant, nevertheless, needs to work with Southwark and existing occupiers to progress the detail of its business relocation strategy.
- Housing – The proposed build to rent housing contribution (35% affordable housing) is strongly supported pending an independent viability review;
- Urban design – The scheme would significantly increase the permeability and legibility of the area, whilst successfully accommodating a rich mix of uses that would support the vibrancy and sustainability of Elephant and Castle town centre;
- Transport – The proposed enhancements to transport infrastructure are strongly supported. Notwithstanding this there are a number of transport issues to resolve, including a Northern Line Ticket Hall funding gap and the design of service access from New Kent Road.
- Recommendation – That Southwark Council be advised that, whilst the scheme is strongly supported in strategic planning terms, the application does not yet fully comply with the London Plan.

Transport for London

818. TfL has a direct interest in the scheme which will include a structural box for the new Northern Line station entrance, ticket hall and escalators which London Underground (LU) will fit out. This will replace the current lifts and ticket hall which are inadequate to cope with predicted increases in passenger demand. TfL also owns land within the red line, the site contains areas which are TfL operational land, and TfL is Highway Authority for New Kent Road, St George's Road and Newington Butts. The site is close to cycle superhighways 6 and 7.

Concept design for new ticket hall progressing well but there is a funding gap. If this cannot be resolved, further funding in the s106 agreement or Development Agreement with TfL will be required.

TfL has yet to agree the acquisition of land the applicant wishes to obtain from TfL. Would be desirable if both issues could be resolved prior to determination, otherwise Grampian conditions required to control the commencement of the development until they have been resolved.

Location – very suitable for a high density, mixed use development. Has a PTAL of 6B. Pedestrian permeability – would be improved, but are missed opportunities on the east site. Park Route would not link to a crossing on Elephant and Castle and planters and cycle parking in this location limit footway widths. Western arches would be closed off; at least the southern section should be opened up.

Measures to reduce 'through' pedestrian demand on the eastern side of Elephant and Castle would be supported; opening southern arch route would help with this.

Potential pinch point at south-west corner of plot E3 which would increase walking distances for pedestrians.

With layout proposed the use of the footway by cyclists may have to be rescinded, worsening conditions for cyclists – opening up the southern arch route would assist, or setting back the footprint of E3.

Plot W2 would create a pinchpoint next to cycle track which could create a pedestrian / cyclist conflict which would be unacceptable;

Wayfinding will be essential, and Legibile London funding should be secured through the s106 agreement;

Cycle parking would comply with the London Plan, although folding bike storage should not normally count towards this provision unless justified.

.If accessible car parking were removed, more cycle parking could be provided;

Some public realm cycle parking would be in inappropriate locations – a cycle hub should be provided.

Existing cycle hire docking station would need to be relocated or reprovided through a s106 agreement.

Lack of improvements to the overground station is a missed opportunity – funding for this should be secured.

Car-free development welcomed and parking permits should be restricted.

Unlikely to have an unacceptable impact on the public transport network provided new ticket hall, Thameslink improvements and Northern Line capacity improvements delivered.

Travel Plan with regular monitoring required through s106.

If west site servicing is inadequate it could impact upon Newington Butts and St George's Road.

Significant additional traffic on Brook Drive could impact cycle superhighway 7.

East site servicing access could adversely impact upon buses, pedestrians, bus passengers and cyclists raising safety concerns.

-Servicing for east site was included in the design of Elephant One.

Crossing needed on New Kent Road which could impact upon servicing arrangements.

East site servicing represents a safety and operational risk to the TfL road network.

Potential issues regarding construction management would need to be resolved.

No dedicated taxi rank is proposed.

Information will be required to ensure LU assets would be protected – condition for method statement recommended. Also applies to Network Rail.

Some areas of TfL highway would need to be stopped up.

S278 agreement required for highway works including street trees. A public realm strategy to secure this should be included in a s106 agreement.

Detailed s106 requirements provided including cycle hire membership.

819. Detailed comment latterly received on the draft Construction Management Plan (CMP). TfL acknowledge that the CMP is subject to change and emphasise that potential impacts on the TLRN need to be further investigated in future CMPs, particularly on issues including timing and management of site access, the cumulative impact of different site access/egress points operating in tandem and the nature and extent of mitigation measures. Reference is drawn to TfL's 2017 CLP guidance.

Transport for London additional comments:

820. *Are aware that discussions are still ongoing in relation to the proposed Delancey scheme and their planning application at Elephant & Castle. Understand that the issue of the station and the proposed improvements to the Northern Line Ticket Hall were raised during the Planning Committee's deliberations and by local communities, with questions about its delivery. Hope the following is helpful in this context:*

- The upgrade to Elephant and Castle station with a new Northern Line ticket hall - which is due to be delivered as an integrated part of the development scheme - is vital not only to mitigate impacts of this particular development and provide step free access to the Northern line but to support growth much more widely and help meet the significant projected forecast increases in demand from across the area.

- TfL is committed to working with partners to deliver these vital improvements to Elephant & Castle station. There is a funding agreement in place between TfL/GLA/Southwark that commits the parties to provide funding.

- It is usual at this stage of a project for discussions to be ongoing around detailed delivery, risk allocation etc. While the costs are currently higher than the committed funding of £130m, TfL are undertaking value engineering work to reduce costs and minimise any funding gap as well as exploring - with our partners - additional funding options. While this work and discussions are ongoing, TfL are confident that collectively with our partners, TfL should be able to resolve this.

- While the final budget has to be confirmed, this would be agreed once consent is in place which will enable further detailed design work etc. to be undertaken to inform a delivery agreement – including issues such as fixed price, programme and risk allocation between the parties. Resources are in place to complete the necessary design work.

- There are significant impacts if the station is not upgraded. Already it is operating in excess of its capacity limit - in the morning peak, some 30% of passengers entering the station are using the spiral emergency stairwell rather than queueing for one of only two lifts, and there are times when staff are required to manage congestion by 'holding' passengers outside the station. It is expected that such operational control measures will otherwise become much more frequent, more severe, and last for longer.

London Borough of Lambeth

821. No objection, subject to an analysis of transport impacts. Details of what analysis should take place have been provided.

London Borough of Islington

822. No comments.

City of London

823. No comments.

London Borough of Westminster

824. Objection - Insufficient information has been provided with regard to the visual assessment, particularly the view from 23A.1 and Serpentine Bridge Sequence, for the City Council to determine if there will be an impact on the setting of Westminster World Heritage Site. The graphics within the Townscape, Built Heritage and Visual Impact Assessment relating to views from the Serpentine Bridge gave us reason for concern. Higher resolution images where we can zoom in and that do not pixelate would be helpful. Would like to be able to clearly see the edges of the existing buildings versus the outlines of the proposed buildings (potentially the outlines for proposed could be turned a colour other than white for some contrast with the sky).

825. Subsequent comments following submission of additional information – Holding objection – response awaited.

London Borough of Bromley

826. No objections.

Royal Parks

827. Confirm that The Royal Parks would not object to this planning application. The highest proposed building stands at 124.5m AOD. Our guidance on Sky Space visible around the Parks shows a total acceptable height of 125mAOD, 0.5m over the proposed building.

Historic England

828. This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Environment Agency

829. No objections, but advise that flood resistance and resilience measures for the basement and ground floor levels be incorporated on both parts of the site and the basement car parks should be protected from inundation – can be dealt with by way of informatives.

Thames Water

830. Conditions and informatives recommended.

831. Subsequent comments further to them having reviewed Tabernacle objection - Developer is proposing to attenuate 50% of their peak surface water run-off. This will reduce flood risk in the area as the increase in foul water flow will be more than offset by the decrease in peak surface water flows. Request that the Tabernacle contacts Thames Water if any flooding occurs. Regarding sewerage, the London Plan states that brownfield developments within London should reduce their surface water run off

to greenfield run off rates (5l/s/ha). Thames Water do not have concerns regarding this application because we will ensure that the development follows policy 5.13 of the London Plan. As a result there will be betterment to this area of the sewerage network after the development is constructed.

Natural England

832. No objection. Standing advice referred to in relation to protected species.

Health and Safety Executive

833. No need to be consulted on this application and no comments to make.

Network Rail

834. As the site is adjacent to Network Rail's operational railway infrastructure and commercial estate property, NR's Asset Protection Team should be contacted. Advice provided regarding detailed construction matters and future maintenance access.

London Underground

835. Comments will be incorporated within wider TfL response.

Additional comments:

836. Applicant is in communication with London Underground engineers with regard to the development above. Have no comment to make on the application except that the developer should continue to work with LU engineers.

London Overground Infrastructure Protection

837. No comments.

Metropolitan Police

838. Initial request for space to be reserved on the east site for police facilities subsequently withdrawn. Secure by design condition required.

London Fire and Emergency Planning Authority

839. Pump appliance access and water supplies for the fire service were not specifically addressed in the supplied documentation, however they do appear adequate. In other respects this proposal should conform to the requirements of part B5 of Approved Document B.

Theatres Trust

840. Object to demolition and loss of the Coronet Theatre, a cultural destination for 140 years area on the Trust's Theatre Buildings at Risk register. Recognise need to regenerate the area, but not at expense of its diverse cultural mix. Coronet should be retained as a viable and valuable operation and one of the few music venues of this scale serving this need. Much of 1930s Art Deco auditorium remains and Art Deco street façade could be revealed. Is only venue that remains of Elephant and Castle's cultural heyday as the Piccadilly of South London'. To satisfy London and local policy

the council must be satisfied there is no longer a demand for this type or size of cultural facility.

841. Paragraphs 17, 27 and 70 of NPPF relevant to cultural facilities, and policies 4.6 of the London Plan and 4 of the Core Strategy. Is one of only four remaining music venues in the area in London's Grassroots Music Venues Rescue Plan. Would be no replacement facility of appropriate size or nature, and application fails to demonstrate the building is unviable or surplus. Southwark Playhouse and Skipton House venue are not replacements as Playhouse is replacement for another theatre, and Skipton House venue has no clear operator or purpose and would not be live music venue like the Coronet
842. Would be 8 years between loss of the Coronet and provision of small music venue which would not be an equivalent replacement. If permission is granted, council should ensure an operator for cultural venue is secured who is involved with its design. Is no clear statement about the vision or purpose of cultural facility or its operation. S106 agreement should secure cultural and operational management plan for new venue, funding for construction, fit-out and technical facilities, bar and ancillary facilities to be operated by venue operator, clarification on lease type, and affordable rent secured including associated bar/retail space.
843. Additional comment following re-consultation - the additional information submitted does not change our position and Theatres Trust continues to object to this application involving the demolition and complete loss of the Coronet Theatre.

Additional comments from the Theatres Trust

844. If permission is granted, request a condition for building recording of the Coronet Theatre.

Maintain objection to the plans due to the loss of the Coronet Theatre;
Inclusion of a bingo hall (first right of refusal) does not address the loss of the Coronet;
First right of refusal for a bingo operator is not sufficient;
The location and form of the bingo hall is not set out;
Concerns about compatibility of a space as both a bingo hall and music venue;
Proposal contrary to the NPPF, London Plan and Core Strategy as does not re-provide a facility of equal value and there is no evidence it is surplus to requirements;
Plans should be amended to include a separate bingo hall and arts venue of equal standard to the Coronet;
Conditions are required if permission is granted.
Recommend refusal.

6 Cinema Theatre Association

845. Object to the loss of the Coronet and support comments made by the Theatres Trust;
Coronet has value for its architectural quality and as a flourishing music venue;
Disagree with statement in the planning application that the shell of the Coronet has no architectural merit;
Planning policy documents for the area should, but do not, recognise the Coronet as a heritage asset or the contribution that it makes to cultural life in the area;
The planning application documents do not recognise the Coronet has having heritage value;
The value of the Coronet has been systematically understated and ignored to facilitate comprehensive redevelopment;

The Coronet makes a major contribution to the cultural and night life of inner south London;

The Coronet employs over 100 people and attracts 250,000 visitor each year and generates local revenue;

The Coronet is a major venue owing to its capacity and the replacements offered in the master plan would not be adequate;

The Coronet is shown as a large venue in the Mayor's 2015 'London Grass Roots Music Venue Rescue Plan' which recommended that the protection of music venues be built into the statutory planning process;

The GLA stage 1 report concludes that the loss of the Coronet is acceptable in the interests of the wider development but this undermines the music venue strategy;

The proposal would bring an abrupt end to a continuous 140 year long history of popular entertainment in Elephant and Castle;

The proposal would destroy a rare and important example of the cinema architecture of William R. Glen which retains art deco features;

The proposal would destroy a building of acknowledge local heritage importance which should be added to the council's local list of heritage assets;

The proposal would result in the closure of a flourishing music, cultural and performance venue;

- The proposal would contradict and undermine the London Music Venue Strategy, and would set a precedent.

Additional comments

846. Remain strongly opposed to the demolition of the Coronet cinema, for reasons set out in our objection letter of 16th June 2017. In the event that demolition is permitted, supports recording of the historic Coronet building at HE Level 3, as shown in the planning condition.

Twentieth Century Society

847. Object to the application. The Coronet is a remarkable example of surviving Art Deco auditorium decoration and retains original features externally. It is a non-designated local heritage asset and should be retained. NPPF requires the impacts upon the significance of heritage assets to be considered. Its demolition is not justified and contrary to the NPPF. Fully support comments from the Theatres Trust and the Cinema Theatre Association.

Elephant and Castle Traders' Association

848. Proposal contrary to SPD29: Land uses, SPD41, SPD45 and SPD53 and does not comply with the Core Strategy and Saved Southwark Plan policies;
Lack of any affordable commercial units, contrary to SPD1;
Lack of a relocation strategy for affected retailers – to minimise the impact upon BAME traders a strategy should be submitted which guarantees the retention of existing businesses;
Relocation strategy must be timely and before permission is granted, as relocation can take 12-24 months;
Lack of concessions to the diverse character of the area as a migrant and ethnic business centre;
Recommendations in the report 'The case for London's Latin Quarter: Retention, Growth, Sustainability' should be taken into account;
Recommendations in the report 'Participatory workshop in the context of the Elephant and Castle Town Centre Regeneration plan' should be taken into account when

drafting a relocation strategy;

The shopping centre is a meeting point for BAME groups and are set to lose the most from the proposed development;

An equalities statement submitted with the application concludes that there will be adverse impacts on BAME business groups but offers no mitigation. A full equalities impact assessment is required;

Application documents should be made available in Spanish, in the shopping centre and the council should accept responses made in Spanish – officer response - Current Government guidance advises against translating documents into foreign languages, other than for emergencies. The developer offered to present the proposals to interested parties in Spanish, and there is in-house Spanish at Tree Shepherd.

- Concerned about the opening up of arches 6 and 7. The applicant has no contractual relationship with them – question whether there have been discussions with Network Rail

Latin Elephant

849. Object to the application on the following grounds:

Proposal does not provide any affordable commercial units

Does not set a clear relocation strategy for retailers directly affected by the development.

Does not make any concessions to the diverse character of the area as a migrant and ethnic business centre.

Does not assess wider implications on the local economy

No Equalities Impact Assessment has been made to assess impact of the development for existing BAME traders in the Elephant and Castle commercial area.

Concerns over the development of the railway arches

Concerned about the timing and consultation process for the application.

The proposal ignores and thus not fulfils recommendations set in the Elephant and Castle SPD, policy 4.8 of the London Plan and the Elephant and Castle Traders' Charter (2007).

Equalities Impact Assessment should be carried out which considers impacts upon the local population and adjacent shopping parades.

Should be prioritised return for existing traders.

The viability and appropriateness of the scheme should consider impact of development for

existing arterial shopping parades.

-The Applicant should provide 10% affordable unit spaces, a timely relocation strategy, measures to maximise retention of existing businesses, particularly those of Latin American background.

Proposal should assess long term implications of the proposed development over the local economy.

Need clarity regarding consultation and arrangements made with property owners, lease holders

and traders in the railway arches.

Need greater compliance with statutory requirements in consultation process. e.g. availability of

documents in languages other than English and accessibility concerns and additional time in

the consultation process to allow those whose first language is not English time to digest proposals and formulate a response.

To retain character and continuity of the area as a diverse and multi-ethnic retail

centre.

For the Applicant to take into account the development proposals and the recommendations of the report 'The case for London's Latin Quarter: Retention, Growth, Sustainability'.

'Relocation Alternatives for EC Traders' and London's Latin Quarter.

Additional comments on draft local business support and relocation strategy

850. Does not consider equality impacts, account for diverse retail offer or guarantee continuity of the shopping centre as a specialist centre of economic activity catering to BAME groups.

Would not deliver 10% affordable retail across both parts of the site.

Not prepared in consultation with traders and local groups.

Does not prioritise a return for current independent and BAME traders to the new development.

Does not consider that BAME traders wish to remain clustered through relocation and in returning to the new development.

Should be amended to state that the applicant will take steps to help existing traders and businesses benefit from short and long term opportunities offered by the wider Elephant and Castle regeneration, not 'where practical' will take steps...

Existing traders should be given first choice or prioritised return over new start ups or independent retailers for affordable retail space.

References to mixed use retail space should consider London plan definition of diversity;

Traders and local groups should be involved in drafting the relocation strategy and should have an input into the s106.

Should be a separate compensation fund for loss of trading during relocation period.

Question the timing of the strategy ,when it would begin, including the allocation of funds.

Businesses have left the centre and missed out on funds and support.

Strategy and fund should be staggered so implementation can start as soon as possible. Should allow for a transition period before permission is granted to include traders who were tenants as of Delancey's take over in 2013 and are currently leaving the shopping centre.

All existing independent traders should be eligible for Tree Shepherd support;

No mention of process for disclosure of the database and for it to be publicly available.

Wording on database vague as does not specify where the units will be, only a broad indication. East Street too far and no mention of clustering.

Clarity over issues of transparency and equal access to information required.

Database should be available in different languages and formats;

No mention of the bidding process and allocation of affordable and vacant retail units or who would be in charge of this process.

Relocation fund should include reference to loss of trade and does not mention existing businesses returning to the site once the development is completed.

Prioritised return for existing traders should be incorporated into the plans;

Inequitable disposition of affordable retail across the two sites, resulting in less than 10% overall;

As east site would have more retail, 10% on-site provision should be provided on that site;

For the 'East Site' the Applicant's proposal offers a total of 25,720sqm of retail floorspace, which already means a loss of 1,484sqm compared to the current Shopping Centre floorspace (27,204sqm), or the equivalent loss of 5.5% in retail

floorspace;

The 5% shortfall in provision of affordable retail on the 'East Site' will mean a loss of 1,286 sqm, which counts for about 15+ units considering the current average unit sizes (estimated at 80sqm per unit).

Strategy states there will be around 1,200sqm of affordable retail space overall. If this figure is accurate, it would mean that not even the proposed 5% of affordable retail space (which does not to comply with Southwark's planning policy).

Affordable retail payment in lieu does not comply with the council's affordable retail policy and would be used for "the provision of affordable retail space elsewhere in the Opportunity Area" which is vague and broad.

It is considered necessary at this stage to stipulate the tariff set per square metre that will be paid in lieu.

Strategy advises that up to 10% of flexible commercial space on the west site would be affordable. This should be amended to no less than 10% otherwise there would be as little as 1% provided.

Tree Shepherd funded by the applicant, but appointed by the council. This is a confusion of roles and a conflict of interest raising suspicion and lack of trust from existing traders.

Urgently need a non-disclosure and confidentiality agreement between Tree Shepherd and the traders.

Additional comments:

851. *Despite changes to the proposals mitigation measures insufficient to protect BAME traders, customers and residents.*

Welcome efforts to increase affordable retail space, but have questions over the impact of the loss of space will have on traders' wish to remain clustered during and throughout the relocation process;

No certainties on security of tenancy for traders;

Amended relocation strategy includes space from other developments including Manor Place and East Street Market which were not consulted on with traders or Latin Elephant and are not suitable;

Proposal does not comply with the draft Southwark Plan to prepare a relocation strategy in written consultation with affected businesses;

Only 2,050sqm of affordable retail space would be available for immediate relocation, and 4,005sqm is needed;

Contrary to small shops policy 29 in the draft New Southwark Plan which requires like-for-like replacement;

Traders wishing to relocate in the short term will not have a secure lease and the applicant has not committed to a first refusal for existing traders wishing to return to the completed development – officer response – the s106 agreement would secure that existing traders within the east site line would have priority for affordable retail space within the development;

Loss of existing business clusters;

No guarantee that all SMEs will have access to the database of relocation opportunities or priority to bid for new units for immediate relocation and within the redeveloped site;

Clarity required over when the database would be available and certainty that traders would be able to choose where they want to be relocated to;

Would welcome close consultation with traders and local organisations (in the form of a retail strategy panel) to develop an acceptable relocation strategy;

The applicant claims not all independent traders wish to relocate, but of the 20 Tree Shepherd have engaged with, 85% wish to relocate.

Where traders do not wish to relocate, statements from them should be included in the

relocation strategy;

Request a specific Equalities Impact Assessment for the Latin American Community;

Equalities information is two years old and needs updating;

An updated equalities assessment taking account of all the changes to the application should be provided;

Sex is a protected characteristic and there is a large proportion of women using the bingo hall but no mitigation has been offered;

Request measures to mitigate the impact on women entrepreneurs, who are also of BAME background;

Relocation fund is insufficient and there are vague references to CIL money;

Mitigation strategies not sufficiently detailed and do not consider impact on secondary economies and supply chains;

Loss of covered community space currently above Tesco's and circulation space in shopping centre which is used for social purposes;

Loss of arches 6 and 7 which house 13 businesses. No clarity over their future;

Loss of La Bodeguita and Distriandina and alternative venues do not have late licences or are too far away;

Are currently 13 Latin American shops in the shopping centre and 13 businesses in the arches. The cluster would be reduced by a quarter.

Elephant Amenity Network and Southwark Law Centre

852. Object on the grounds that there has been insufficient and inadequate consideration of the impact on groups with protected characteristics. The council and applicant must provide evidence of having done so before the application goes to committee;

The council must have regard to its duties under the Equality Act;

The council should follow its own published policies or take these into account as material considerations unless there are strong reasons to the contrary including the council's Equalities Approach (2015), Elephant and Castle SPD, Statement of Community Involvement (2008) and emerging policies in the draft NSP and Old Kent Road Area Action Plan (AAP)

Draft NSP should be given weight by decision-makers unless material considerations indicate otherwise. Reasons should be given for not following the emerging policies.

Draft NSP and Old Kent Road AAP contain policies on business relocation and the AAP provides guidance on relocation strategies which should be considered in relation to the planning application.

The Council's 9 May 2017 cabinet report is flawed as it sets out the number of shopping centre tenants and operators which qualify for support, but does not include Hannibal House offices space, market stalls and businesses in the railway arches.

9 May 2017 cabinet report fails to explain how it has identified 86 shopping centre tenants which differs from the 77 identified by AECOM in its equality analysis;

9 May 2017 cabinet report does not make clear how the 27 local operators to be offered support has been reached.

Failure to explain where market stallholders would be relocated to contrary to Elephant and Castle SPD which support markets.

Cabinet report flawed as it does not make clear that equality duties relate to Council functions generally including planning decisions.

9 May 2017 cabinet report fails to consider equality issues arising from businesses not falling within the identified 27 including market stall holders, charities in Hannibal House, employees in shops and users of the bingo hall and bowling alley.

9 May 2017 cabinet report does not consider mitigation measures in relation to the Latin American community and there is no discussion about mitigation for other groups identified by AECOM.

Council has not identified with precision the full range of equality implications.

Council, developer and Tree Shepherd should confirm in writing that all businesses within the red line would be supported by Tree Shepherd.

9 May 2017 cabinet report does not seek to implement all mitigation measures recommended by AECOM including independent panel to provide business advice, transition strategy and monitoring of equality and diversity issues.

Mitigation measures in Cabinet report do not follow emerging policy in the Old Kent Road AAP which is a material consideration and would point towards refusal;

Database of vacant properties is not sufficient; should consider if they are viable relocation opportunities.

Businesses wishing to cease trading should provide a statement confirming to dispel fears pressure being exerted on businesses to cease trading.

The council put shopping centre traders on notice that there would be 4 weeks of consultation on equality issues and business relocation. None took place and all that has happened is the application has been revised.

Officers must ensure that meetings are held between the council and the traders to hear their views and ensure they are taken into account.

Proposal would provide 5% affordable retail on the west site with a 5% contribution and 10% on the east site. As would be more retail on the east site this results in an overall provision of only 5.48% affordable retail across both sites.

The council should insist upon 10% affordable retail on the site, avoiding setting a precedent for payments in lieu, and should provide off-site affordable retail in addition..

Failure to provide 10% on-site affordable retail raises equalities issues.

The council should facilitate opportunity for traders to explain their own priorities for a relocation strategy to the applicant.

The draft strategy should confirm that affordable rent is 40% below market value.

The strategy should be secured through a s106 agreement.

Affordable retail contribution should be put towards affordable retail space elsewhere in the opportunity area.

Additional equalities work should be undertaken before committee including an assessment of the impact upon all businesses within the red line application boundary and further work with existing traders to find out their priorities and concerns regarding relocation;

Councillors should take the final decision on any s106 agreement.

Additional objection from Southwark Law Society

853. An additional objection has been submitted by Southwark Law Centre raising the following concerns:

The equality analysis undertaken by AECOM focusses on a situation where a compulsory purchase order is needed, but no general analysis has been undertaken of the effect of granting planning permission.

The equality analysis is not up to date, having been carried out in February 2016;

An equalities analysis of the relocation strategy should be undertaken;

Actions taken by the developer since February 2016 but prior to any grant of planning permission should be undertaken such as not renewing leases, renewing leases on less favourable terms, and not maintaining the shopping centre ;

Leases for businesses in the shopping centre and Hannibal House are expiring imminently and they would miss out on the relocation fund;

There should be an equality analysis of the applicant's proposed mitigation, for example to ensure that film screenings at a new cinema would offer a real alternative to the current leisure offer;

Officer report advises that local young people and BAME groups may face barriers to

participating and be underrepresented but offers no mitigation;
 Affordable retail space within Strata and Dashwood has been occupied so is not relevant and should not be referred to;
 Walworth Road does not offer similar services used by the Latin American community at the site;
 No clarity about when the relocation fund would be available or how it has been calculated;
 Lack of support for market traders;
 Could be no affordable workspace on the site and may not be sufficient or suitable for existing charities which support the BAME community;
 Officer report suggests 50 traders meetings have been held with the applicant, but it was individual meetings with 50 traders;
 The loss of the 'Tesco' space and covered amenity space in the shopping centre have not been considered;
 The number of events held at the Coronet is understated in the officer report;
 The loss of dance venues La Bodeguita and Distriandina are not considered and alternatives given are not comparable;
 The bingo should be re-provided for equalities reasons;
 Suggested mitigation for the bingo may not be suitable;
 Equalities impacts relating to the bowling are incorrectly stated in the officer report;
 Loss of a language school and the LCC language school may not be comparable;
 The new housing is not required in order to comply with the London Plan because the minimum for the opportunity area has been met;
 Impact upon women not considered in the equalities assessment;
 No information of relocation support specifically tailored to the BAME community;
 Negative impacts are including in the positive impacts section of the equality assessment with no mitigation proposed;
 Lease for the United Voices of the World union due to expire shortly so they would miss out on relocation support, plus other Latin American organisations;
 Office space unlikely to be suitable for charities to relocate to;
 Inaccuracies in additional equalities information submitted by the applicant;
 Community engagement representative is bi-lingual not multi-lingual;
 Planning policy compliance does not mean equality act compliance;
 No evidence of how employment opportunities would benefit the BAME community;
 No evidence of accessibility of business and retail relocation options for disabled people, pregnant women or children with pushchairs.

Southwark Green Party

854. Lack of social rented housing, contrary to policy;
 Affordable housing should be managed by a housing association;
 Lack of affordable retail units;
 Lack of a relocation strategy for existing traders;
 Relocation of existing traders may not be the best option / applicant should think more creatively about alternative strategies to preserve and enhance current shops and cafes;
 Inadequate range of leisure facilities which would not cater for the whole community;
 Loss of the Coronet / support the view of the Theatres Trust;
 Harm to the listed Tabernacle and Metro Central Heights;
 Lack of attention to green spaces within the redevelopment;
 Loss of light / overbearing impact;
 Loss of privacy;
 Lack of an air quality assessment;
 Missed opportunity to enable active travel and reduce emissions;

Vague aspirations within the draft travel plan including for deliveries;
 Insufficient cycle parking;
 Specialist cycle parking provision for the mobility impaired, trailers and cargo bikes required.

Walworth Greens

855. Inappropriate height and massing, especially on the LCC site;
 Loss of light;
 Light pollution;
 Noise pollution;
 Creation of wind tunnels;
 Loss of privacy;
 Excess population density contrary to Southwark and London Plan policies;
 Undersized rooms;
 Lack of social housing and untenable account of affordable housing provision;
 Reduction of non-residential use leading to lack of amenities and limited leisure choices, especially for older citizens;
 Lack of low cost commercial units;
 Lack of relocation strategy for existing traders;
 Loss of identity, diversity, vibrancy and social mix;
 Disproportionate impact on BAME community;
 Overbearing, negative impact upon conservation areas;
 Overshadowing of listed Tabernacle and Metro Central Heights;
 Defective transport arrangements which fail to integrate the tube and railway stations;
 Poor aesthetic features including blank facades and skyline;
 Lack of greenery;
 Roof gardens must be accessible to the public;
 Insufficient use of renewable energy;
 Insufficient consultation with the BAME community, contrary to equalities duties and regarding the existing LCC area;
 - Does not address objections raised during public consultations.

Southwark Group of Tenants Organisations

856. Lack of social rented housing or an in lieu payment towards it;
 No provision for existing traders;
 No details of any relocation strategy;
 The area will become unaffordable and unwelcoming for ordinary Southwark citizens to live, work and shop;
 Promises over council housing and community facilities have been broken;
 Need to ensure that regeneration truly benefits local people.

Draper House Residents' Association

857. Concerned about footpath widths on east site;
 Concerned about quality of pedestrian street between block N and W;
 Development on west site overbearing on the Elliott's Row and West Square Conservation Areas and Perronet House and Princess Street;
 No information on formal consultation / engagement with local groups during the construction works;
 Concerned about impact of long demolition and construction periods resulting in loss of provision for the community;
 Older community members use the bingo hall and no relocation proposals have been

made;

Not clear what alternatives there will be for local shops;

Lack of low cost commercial units for existing traders, including those from the Latin American community;

Support Latin Elephant's work to create a Latin Quarter;

Agree with Latin Elephant and the Walworth Society that providing pedestrian crossings across New Kent Road from Elephant Road and across the Walworth Road from Elephant Road south to Eagle Yard and Draper Estate is important and would support the low line;

Lack of social rented accommodation in the development;

Only 40% of the affordable housing would be at London Living Rent levels;

The tenancies would be 3 year assured shorthold;

Walworth Society

858. Areas of publically accessible (for free) roofspace should be created to enable local people to gain from the development as widely as possible;
- Concerned that the two routes through the shopping centre site would be too narrow;
- Affordable housing viability assessment should be open to public scrutiny;
- Lack of information regarding improvement plans for the railway station. Works to it are crucial to ensure a successful transport interchange facility;
- Concerned regarding construction period, the impact this would have on traders, and meanwhile uses and engagement with local groups is required;
- Information required regarding ongoing support for local businesses which would be removed from the shopping centre and area surrounding it;
- Information required as to how the cultural identity of the area as a centre for Latin American culture and community would be maintained and supported;
- Unclear how the applicant will engage with the commercial future of the wider area including the north of Walworth Road;
- Trust that an assessment of the impact of the development on Walworth Road has been provided, including construction impacts;
- Need to ensure appropriate support is in place so that Walworth Road would be ready and able to be competitive when the new development is occupied;
- Arrangements should be made for groups which use the shopping centre, including older people who use the bingo, younger people who use the bowling, and the Bengali Women's group amongst a number of BME user groups;
- New crossings should be provided across New Kent Road and across Walworth Road to Eagle Yard;
- The terrace at 82-96 Walworth Road should be protected as it would be all that remains of the Piccadilly of the South;
- Recording of the Coronet and shopping centre via 3D imaging required. Note applicant's commitment to remove valuable artefacts from the Coronet for use in the new buildings
- Impact upon the Elliott's Row and West Square Conservation Areas;
- Loss of daylight and sunlight to neighbouring properties;
- The facades on the east site fronting Newington Butts and Walworth Road should be broken up to become more active in appearance;
- Inappropriate use of Corten steel for the cultural venue.

The Walworth Society – further comment

859. Do not object to the aim of improving the area, but object to the application on the following grounds:

- Proposed affordable housing would be contrary to adopted and emerging policy;
- Unreasonable that 10% on-site affordable retail would not be provided. Providing the 10% would help to protect existing communities including the Latin American community;
- Loss of bingo hall and impact upon older people and people from BAME backgrounds. A bingo hall and other leisure facilities should be included in the development;
- Harm to the setting of the Elliot's Row Conservation and West Square Conservation Areas, particularly from tower W1, and impacts upon dwellings on neighbouring streets;
- The application should not be heard by a committee so close to the holiday period and should be delayed until the new year so that everyone who wishes to attend can do so.

Walworth East Area Housing Forum

860. - Affordable housing still not policy compliant;
- Does not provide space for displaced traders or 10% affordable workspace.
 - Failure to make provision for bingo hall;
 - Loss of Coronet (not discussed at the meeting, personal view).

Rodney Road TRA

861. - Affordable housing still not policy compliant;
- Does not provide space for displaced traders or 10% affordable workspace.
 - Failure to make provision for bingo hall.

Hayles Street Tenants' and Residents' Association

862. Impact of tall buildings upon adjoining conservation areas and listed buildings,
Tall buildings will be viewed as a solid wall from some locations;
Overshadowing and loss of light;
Damaged views;
Light pollution;
Impact on wind microclimate;
Contrary to Southwark tall buildings SPD, local and national planning policy and English Heritage guidance;
Proposal will have more negative effects than positive effects;
Some of the towers would be outside the core area for tall buildings identified in the Core Strategy.
Misleading views from within West Square;
Loss of privacy;
Proposal would not meet energy requirements;
Off-setting / payments for carbon dioxide emissions should not be accepted;
Must allow for the needs of disabled people elderly people including more accessible car parking.

35% campaign

863. Object to the application on the grounds that:

The affordable housing is not in accordance with policy;
No affordable retail units are being offered;
No relocation strategy for existing traders;

consultation arrangements do not fulfil the council's equalities responsibilities.

Has been no objective assessment as to how build-to-rent meets any identified housing need or how discount market rent (DMR) meets any affordable housing need and the applicant's assessment cannot be considered objective;

Affordable rent which includes DMR is excluded from Southwark's Core Strategy and until June 2017 from the draft NSP;

The affordable housing offer excludes elderly people and those who are not economically active to make DMR seem more affordable, but this is contrary to equality legislation and other protected groups may be disproportionately represented in economically inactive households;

Lack of social rented housing, contrary to adopted policy;

Question whether affordable housing should be effectively controlled by an off-store company, established to avoid paying UK tax;

Social rent equivalent would not be managed by a Registered Provider or the council, contrary to the Core Strategy;

London Living Rent is not supported by the Core Strategy;

The proposed income bands would be contrary to the Mayor's preference that DMR unit are let at London Living Rent levels;

No information given on the rent levels for the market units. High rent levels would significantly change the social make up of the area and not maintaining a mixed and cohesive community;

The application should be determined in line with current, established policy. Clear reasons must be given for departing from this and none have been provided in the application;

An earlier version of the NSP excluded affordable rent as it fails to meet housing needs in Southwark. No justification or evidence has been provided for changing the policy position and it seems the policy has been amended to suit the proposal;

Would be premature to apply the NSP policy on DMR and it would be a significant departure from adopted policy;

Proposal does not comply with the emerging policy on DMR owing to the rent distribution and proposed 15 year covenant;

Exclusion of economically inactive people, unclear if this includes elderly, retired, unemployed and disabled people which raises equality issues;

Not clear what would happen if people become economically inactive after they have rented a unit;

Confirmation required as to whether the council is formulating an intermediate housing list;

Further information required regarding the possibility of GLA grant funding for the proposal. The application should not be determined until this is resolved as it would impact upon the amount and type of affordable housing;

Tenants would be means-tested and different rents would be paid for identical flats which is inequitable;

Means testing is objectionable as people would have to provide private financial information. Information required as to how it would be verified and who would have access to it;

Approving this application could encourage and promote off-shore arrangements in the Build to Rent sector;

The need for a clawback raises doubts about the housing remaining in the rented sector and the affordable housing remaining as such permanently. Unconvinced that claw-back mechanisms would be robust and effective enough;

The executive summary for the financial viability appraisal does not comply with the council's SPD because it gives no profit figure, no finance fees, no residual land value and aggregates construction costs, acquisition costs and professional fees;

Publishing financial information a week before determination frustrates any meaningful

public consultation. Request that it be released immediately.

Additional comments

864. Object to the developer being able to confirm the tenure of the west site dwellings after permission is granted;
 Unreasonable to expect the Planning Committee to decide the merits of the scheme without knowing the precise tenure of over half of the homes;
 The viability implications of a built to rent / build to sell scheme have not been addressed by the applicant;
 The affordable housing offer uses arguments in support of build to rent, which would not be relevant if half the scheme were build to sell;
 Object to the affordable housing offer being based on emerging policy P4 of the draft New Southwark Plan if half the units would be build to sell;
 Introducing build to sell will confuse the affordable housing requirement. Saved policy 4.4 should apply for the whole site, regardless of whether it is for sale or rent;
 Applicant does not elaborate on what other changes may be required to the west site if it is build to sell;
 Increased social rented units which would be owned by the council or a Registered Provider are welcomed, but social rented would still not reach 50% of the affordable housing needed to meet the local plan;
 The number of London Living Rent units has decreased and Discount Market Rents have increased, contrary to the Southwark Plan, Core Strategy and SPD;
 The proposal does not comply with the rental distribution in policy P4 of the draft New Southwark Plan;
 74 social rented units proposed which does not reply with applicant's letter to the council before the deferral at the last committee that it would seek to provide one third of the affordable housing, i.e. 116 units;
 Developer profit and residual value have not been included in the viability report executive summary, contrary to the Development Viability SPD;
 Object to in-lieu playspace payment on the west site. Should be provided on-site;
 Temporary retail space in Castle Square would be too small and disagree with the applicant's assertion that the majority of a cluster of Latin American businesses would not be affected by the proposal;
 Little provision for market stalls in the amended application which is an equalities consideration;
 Welcome commitment for a bingo facility, but there is no agreement yet on retaining the bingo hall and bowling alley.

Metropolitan Tabernacle

865. Principally support the appropriate redevelopment of the site but have a number of concerns;
 Impact upon the setting of the listed Tabernacle;
 Design of the cultural venue would challenge the dominance of the Tabernacle façade including inappropriate materials, window height and potential advertising windows;
 Lack of rendered views to show the impact upon the Tabernacle;
 Scale and location of W2 tower 3 would be harmful to the setting of the Tabernacle;
 Lack of verified views to enable full impact of the Tabernacle to be assessed;
 The tower at One The Elephant is located over 40m from the Tabernacle and the design of the pavilion building is more sensitive than the proposed cultural venue;
 Lack of information regarding the impact upon the fabric of the northern elevation of the listed building;
 Support replicating the detailing on the southern flank of the Tabernacle on the north

elevation following removal of the LCC building;
 Conditions for construction method statement for demolition of the LCC building and works to the north façade of the Tabernacle requested;
 Wind impact assessment does not consider day-to-day entrance and passageway to north of the Tabernacle, where people are likely to be standing, loading undertaken and which people with reduced mobility use;
 Loss of an existing car park on the LCC site which the Tabernacle use;
 Loss of 20 parking spaces in the shopping centre which the Tabernacle rents each Sunday;
 No policies in the development plan would support a loss of parking;
 Increased risk of flooding . The Tabernacle has experienced flooding in the past, which has increased in recent years possibly due to new developments ;
 Impact upon daylight and sunlight to a flat at the rear of the Tabernacle has not been considered;
 Construction impacts could affect traffic and day-to-day activities at the Tabernacle. Conditions required regarding hours of work, continuous access to the Tabernacle and control of dust and emissions;
 Safety concerns due to objects possibly falling from the balconies and terraces of tower W3;
 Noise and disturbance during construction;
 The developer should be required to have adequate insurance to deal with vibration impacts on the church;
 Flood risk and wind microclimate chapters of the ES should be updated.

Metropolitan Tabernacle additional comments

866. Concerned that noise from the proposed cultural venue could be transmitted to the Tabernacle through the ground or by infrastructure pipes which would affect the Tabernacle's operations. Question how this would be addressed.

University of the Arts London staff and students

867. Object to the application including the timing of the decision. Deciding it in December undermines local democratic accountability.

- A large section of people who will be affected by this decision - notably large parts of the Latin American community who are central to the identity of Elephant and Castle - will not be in the country at this time of year and will have no opportunity to object or show dissent in person.

- Many UAL staff and students who we represent and who have strong opinions on this issue are also away as it is outside of term time. Therefore firstly call upon the committee to delay the planning decision to the new year in order to allow an opportunity for proper democratic scrutiny.

- Note that the decision to take this to committee has prompted an upsurge in objections. Trust that these will all be uploaded online before the committee meeting and that the planning committee will be properly informed of the growing number of objections.

- In the disappointing event that the application is heard on the 18th December we call upon the committee to reject it. Believe this is only acceptable course of action as the application is not compliant with either the letter nor the spirit of Southwark Council planning policy and will clearly have a destructive effect upon community life within

Elephant and Castle as a result.

- Not opposed to a new building for the college within the Elephant and Castle we do not want this to be built on the ruins of the community the current plans will leave.
- Lack of social rented housing not policy compliant;
- Affordable housing not affordable to those who need it. Should not determine built to rent proposals until there is a policy to deal with it;
- Proposal does not provide 10% affordable retail space and the off-site contribution will not benefit traders;
- Equalities impact upon the Latin American community, people of black African, Caribbean descent and older people which the officer report reflect but offers no resolution.

University of the Arts Student Union

868. - Existing community including the Latin American, trader and student communities are under threat;
- Would only provide 3% 'fake' social housing and 5% affordable retail space in spite of large profits;
 - UAL has failed to consider the impact of the plans;
 - UAL should use its position to seek improvements to the scheme such as 100% real social housing, affordable retail units and retention of the bingo hall and bowling alley.

West Square Residents' Association

869. Harm to the setting of then listed Tabernacle and West Square and Elliott's Row Conservation Areas, contrary to policy 7.7A of the London Plan, local and national policies;
- Elliott's Row Conservation Area Appraisal already notes Peronet House and Prospect House (both 11-storeys) as overbearing and negative elements in the conservation area;
- The proposals for the west site contravene English Heritage guidance on tall buildings (Advice note 4);
- The proximity of tall buildings to each other will create a solid wall from many viewpoints;
- Views from West Square are misleading as they are only taken from two positions which have a row of trees blocking the view;
- Loss of daylight, sunlight and overshadowing;
- Loss of privacy;
- Light pollution;
- Would create a windy environment at street level;
- Regard must be had to the Equality Act 2010. More accessible parking would be needed.

Additional comments

870. Do not think that the new tube and overground would cope with additional traffic;
- Roof terraces could be used for noisy events.

Balfour Street Housing Co-Operative

871. Unacceptable affordable housing offer with no social rent and no homes for sale;
 No in lieu contribution is offered towards social rented housing;
 At least 40% of the units should be let at 30% of a London living rent;
 The affordable units would be offered on 3 year tenancies, not assured tenancies with no time limit;
 Financial viability report has not been made public, contrary to the council's policy;
 Lack of provision for existing retailers and lack of a relocation strategy;
 Question what has happened to a planned market square at the 50 New Kent Road site;
 Lack of an equalities impact assessment;
 Loss of the Coronet;
 3D mapping of the Coronet and the shopping centre should be undertaken before demolition.
 The council's planning policies should not be amended to suit the development;
 Terrace at 82-96 Walworth Road should be protected;
 Adverse impact upon the Elliott's Row and West Square Conservation Areas;
 Loss of daylight and sunlight.

Imperial War Museum

872. Welcomes inward investment in the area and supports the mix of uses;
 Value the distinctive character and diverse cultural heritage of the local community and their businesses. Encourage the council to secure measures to safeguard this;
 Footfall would increase therefore wayfinding is required, including to the museum, and this should be secured;
 Transport improvements are supported, would encourage the applicant to contribute towards public realm improvements on key routes from the transport hub including to the museum;
 A contribution towards local parks including Geraldine Mary Harmsworth Park would be strongly supported.

Conservation Area Advisory Group (CAAG)

873. The project has a number of virtues the CAAG group felt that there were several significant flaws and we were keen to report back council in the hopes that these could be addressed:

Blank elevations to Newington Butts and Newington Causeway. Would appear too inward facing and fail to address the high numbers of people which would pass the outside of the site;
 Limited space in front of the railway station. Should be pleasant to move through the site. Advertising could contribute to this.
 Poor relationship of cultural venue with the Tabernacle including its scale and materials;
 Funds should be dedicated to improving the overground station.
 Buildings of too large a scale;
 Impact upon wind microclimate;
 A model of the proposal should be on display during the consultation period;
 Impact upon surrounding heritage assets and strategic views;
 Insufficient lifts to serve the towers;
 West site is in an area of archaeological interest;
 Brickwork welcomed but general design repetitive and dull and west site could better distinguish different character of Oswin Street;
 Question design and function of the Peninsula;

Unclear where market stalls would be relocated to or if they would be relocated;
CIL and s106 money should be used to improve public areas adjacent to the site;
Important to incorporate the present Elephant & Castle/howdah sculpture in a prominent location within the shopping centre.

First round of consultation

874. A total of 19 representations were received supporting the application for the following reasons:

Would deliver much needed new housing;
Proposals well considered and would create a unique town centre hub;
London needs tall buildings and it makes sense to cluster them together in a central location;
-Would offer more to the area than there is at present;
Support for housing to rent;
New facility for LCC;
Would deliver connected transport facilities;
Development is about compromise and not everything would suit everyone;
Regenerating Elephant and Castle is critical and now is the time to do it;
Support the proposal but concerned the towers would be too high on the west site which would be very imposing and would block light and views (officer response – loss of view is not a material planning consideration and cannot be taken into account);
Is an opportunity to reinvigorate the area and bring energy and life throughout the day;
The link between education, commerce, retail and leisure would be beneficial to the neighbourhood;
Area is in need of redevelopment and modernisation;
Current shopping centre not sufficiently modern;
Towers should be illuminated at night;
Support the proposal but concerned about the height of W2 Tower 3 and its impact upon the listed Tabernacle and the lower floors of new, neighbouring towers;
The work should be brought forward and should begin sooner than 2018;
Existing shopping centre not fit for purpose and sells substandard products;
Will put Elephant and Castle on the map as a place to live;
Support the provision of a local concert hall and cinema;
Access to the Northern and Bakerloo line stations must be improved;
Would be a great disappointment to find a rare window of opportunity for such a significant development and its associated improvements for Southwark residents and for it to be missed.

875. A total of 375 representations were received objecting to the application on the following grounds.

Land use

876. Proposal contrary to SPD29: Land uses, SPD41, SPD45 and SPD53 and does not comply with the Core Strategy and Saved Southwark Plan policies.
Application fails to set out existing quantum of A1, A2, A3 and A4 space currently on the site and would result in a loss of leisure floorspace – this prevents proper scrutiny of the application and the application should be re-consulted on.
The proposal favours residential uses over other uses and would fail to build upon the existing leisure offer and meet the wider town centre objectives;
Existing traders pay well above the existing market rent;
Lack of space for smaller entertainment venues;

Lack of space for start-up or craft businesses;
 No affordable retail units proposed;
 No mention of the Traders' Charter within the submission which is referred to in the Elephant and Castle SPD;
 Will result in a predominance of high street chain stores;
 Lack of access to affordable goods – existing traders should be relocated before the shopping centre is closed to keep some stability for existing residents;
 Loss of the market stalls;
 Loss of leisure floorspace;
 Loss of B class floorspace;
 New shopping centre would not be large enough due to other uses proposed;
 -No relocation strategy for affected businesses;
 The existing shopping centre is well used and is a meeting place for the local community including people with mental health illnesses who may become isolated / excluded if they do not have the familiarity they are used to;
 there would be reduced range of facilities including leisure activities on the site than currently exists;
 development would be too dense but would deliver little retail space, less office space than exists on the site, and less leisure space;
 Loss of the current identity of the area which allows specialist shops and independent businesses to thrive;
 Additional background information regarding public consultation methodology used is required;
 Additional survey data gained in the evening that captures leisure users' views is required;
 Additional investigation required into the effect of redevelopment on the older population;
 Further discussion required with all businesses at risk of being displaced and a package of compensation agreed individually or collectively in advance of a decision on the application being reached;
 The centre is a meeting place for the local community, especially the bingo hall;
 too much of the area is given over to students;
 Loss of bowling alley which is suitable for all ages and allows for physical activity;
 Proposal focuses on high value retail and leisure uses and is financially motivated, and fails to take account of local needs;
 gentrification and providing a different type of retail at the site would adversely impact people on lower incomes;
 Loss of bowling facility means that people would have to travel further afield for this leisure activity;
 All-weather leisure activities for young people should be included;
 Loss of the Coronet would deprive residents of a potential theatre venue;
 Local business keep money in local communities, which would not be the case for national retailers;
 The council should support existing traders, not use compulsory purchase powers to evict them;
 Question the need for retail units on the west site as new units nearby are unoccupied, boarded up and covered in graffiti and the area surrounded by rubbish;
 An independent retail impact assessment should be funded by the developer to assess the impact upon the local economy, including Walworth Road;
 Loss of the Coronet;
 Fails to take into account the status of the area as a focus for the Latin American community;
 The proposal does not demonstrate that the shopping centre would have sufficient floorspace to offer comparison goods;

Density

877. Proposal would exceed density range prescribed in the Core Strategy and the calculation does not include the non-residential floorspace.
 In spite of high density, the proposal would provide relatively little retail space and significantly less office and D2 leisure space, and only 10% of the jobs expected to be delivered in the CAZ;
 The scheme prioritises housing and policy 21 of the Elephant and Castle SPD advocates the introduction of residential *where feasible*;

Housing / Affordable housing

878. Lack of affordable housing;
 Lack of social rented housing would be contrary to policy;
 Mix of affordable housing would not be policy compliant;
 Applicant's viability report has not been made public and the executive summary does not comply with the council's SPD;
 Providing entirely intermediate housing would not be acceptable and would be contrary to the London Plan and emerging London Plan policy;
 Emerging London Plan policy should not hold any significant material weight as it is subject to consultation and further change;
 The affordable housing offer would include 16 studio flats which would be contrary to policy;
 Lack of family housing;
 The development should not be solely rented dwellings, it should include owner-occupier accommodation;
 Concerned that 35% affordable housing may not be delivered and service charges could render the accommodation unaffordable;
 Existing estates should not be demolished if no social rented housing will be delivered in their place;
 Short term tenancies would increase levels of transience in the local population, undermining a sense of community;
 The new housing would increase prices in the area, forcing out local people;
 Rent controls would cease after 15 years;
 HMRC found the applicant to use tax avoidance measures and the applicant is registered off-shore;
 Development within the opportunity area including consented developments in the pipeline and the application proposal would exceed the 5,000 new dwellings required under the London Plan, suggesting the lack of a plan-led approach and undermines wider objectives for the area;
 A claw-back mechanism in a s106 agreement would be required to secure an affordable housing contribution in the event that affordable homes are converted to market rent in the future;
 A mix of affordable units would be required and would need to be maintained;
 Service charges would need to be considered;
 The dwellings would not be affordable to most people in need of them;
 The developers profit is such that the development should be policy compliant;
 Lack of social rented houses would disproportionately impact upon women and people from BAME backgrounds;
 The draft reasons for refusal presented to the 30th January 2018 Planning Committee do not include a reason for refusal on the grounds that no social rented units would be provided. This should be included because that is what is required by adopted policy,

and social rent 'equivalent' units are from a draft policy which has only limited weight at present;

Design

879. Loss of existing buildings which are of merit;
 Loss of one of London's oldest shopping centres;
 Loss of the Coronet which has an art deco façade and interior;
 Buildings too tall and there would not be enough space around them / not proportionate to the size of the site or of a human scale;
 Lack of a public square on the shopping centre site;
 Heights could possibly increase on shopping centre site of reduced on LCC site;
 Buildings on the LCC site should be no more than 10 storeys;
 Lack of character to the development / loss of identity;
 Would result in a group of almost uninterrupted tall buildings;
 New streets within the east site would be too narrow;
 Lack of green spaces within the wider area;
 W3 tower 2 was not shown in documents for pre-application exhibition;
 Unacceptable impact upon listed buildings and conservation areas;
 Impact upon protected viewing corridor;
 Gentrification will alter the character of the historic area and everywhere looks the same;
 the outside appearance of the shopping centre could be improved and it could be renovated internally;
 Blank facades to a number of buildings on the west site.
 Adverse impact upon the Elliott's Row and West Square Conservation Areas;
 Would create a skyline of almost uninterrupted tall buildings which would be overbearing;
 Elliott's Row Conservation Area Appraisal notes Peronet House and Prospect House as overbearing and proposal would add to this.
 Area already blighted by tall buildings;
 Council rejected 1,000 flats on the shopping centre but now 979 are proposed.
 Unimaginative design with no architectural merit;
 The building would unacceptably screen 1 The Elephant and would prevent its architecture from standing out;
 Design of cultural venue, including advertising panels and materials would be out of keeping with the surrounding area;
 Lack of public space at the top of the tall buildings, contrary to policy;
 A s106 agreement should require relocation of the Faraday Memorial to create additional open space;
 Understood that the existing LCC building is listed – officer response – it is not a listed building;
 The LCC building was extended less than 20 years ago. Question whether the proposal is another example of short-termism;
 Concerned that the quality of the buildings would be reduced if permission is granted;
 LCC building looks like a speculative office development – the existing building is better quality;
 The east site would have a small, windy and overshadowed space at the centre, not a new town square;
 Demolition of the Coronet would diminish the cultural and architectural heritage of the area;
 Lack of green spaces within the development;
 Past proposals to build close to Strata were rejected by the council;
 Stark increases in building heights with inadequate tapering;

Streetlighting on Oswin Street should be upgraded.

Quality of accommodation

880. no reference in the submission to Lifetime Homes standards, contrary to saved policy 4.2 of the Southwark Plan;
Lack of public and private amenity space including childrens' playspace;
Units would not comply with the minimum internal space standards in the council's Residential Design Standards SPD.

Amenity

881. Proposal contrary to saved policy 3.2 of the Southwark Plan and the council's Residential Design Standards SPD;
Noise, dust and dirt during construction;
Impact upon access in and around the area during construction, including for disabled people;
General noise and disturbance, including from proposed location of servicing access;
Increased pollution;
Light pollution from towers at night;
Increased noise pollution including from parking on Oswin Street;
Air quality is poor in the area;
Loss of daylight, sunlight and overshadowing (including to Lamplash Street and the allotments and lower floors of Strata which are social housing);
Loss of daylight and sunlight can lead to mental health issues;
Question whether measurements for sunlight involve measurements taken at ground level;
Loss of view (officer response – this is not a material planning consideration and cannot be taken into account);
Loss of privacy, from towers and proposed shared gardens;
Would result in a narrow alleyway next to the Tabernacle which could result in a poor and potentially unsafe environment for pedestrians, particularly at night.
Overbearing impact / loss of outlook;
Tower on west site should be no higher than existing LCC building and plot W2 tower 3 should be removed to ensure no adverse impact upon existing buildings;
Increased crime, including from new alleyway which would be created next to the Tabernacle;
Gusts of wind near Strata at present, and this issue is likely to increase;
Request that copies of any asbestos surveys and any site investigations undertaken be made available – officer response – these have not yet been undertaken and would be subject to conditions. Documents submitted in order to discharge planning conditions are publically available on the council's website;
Noise and disturbance from servicing activities on Oswin Street, people using balconies, pocket parks and the cultural venue;
Lack of public toilets;
All open space within the development should be fully, publically accessible;
Question whether rights to light have been considered and if not, request a study – officer response – rights to light are not a material planning consideration and cannot be taken into account;
The existing shopping centre is being neglected;
Will undermine the confidence of families wanting to buy in the area by setting a precedent for tall buildings being constructed close to existing buildings.

Transport

882. Increased traffic and traffic delays;
 Area already crowded, no consideration of crowd control;
 Oswin Street already used as a service road for Elephant and Castle and by construction vehicles;
 Oswin Street should be made one-way;
 Insufficient provision for deliveries to the new dwellings;
 The tube station is already at capacity;
 Not clear if improvements are proposed to the tube station;
 Already high levels of traffic on Brook Drive;
 Impact on public transport / overcrowding;
 Impact upon highway safety including residents, school parties and cyclists;
 The development should not be accessed via narrow, existing residential roads, including construction traffic;
 Traffic, congestion and pollution have increased since changes to the highway network were implemented and these problems would worsen;
 Lack of vehicular access to the Tabernacle during construction;
 Loss of parking for people using the Tabernacle;
 Safety of children using the Tabernacle for Sunday school;
 The applicant should support the redevelopment of the railway station;
 The proposal would not deliver step-free access to the railway station;
 Increased traffic including from servicing vehicles along Elephant Road would be harmful to amenity and pedestrian safety;
 Lack of information regarding the agreed sum for the northern line ticket hall and a potential funding gap which could impact upon viability. A Grampian condition would be required to ensure that the ticket hall is delivered;
 Question whether the work would take place at the same time as the Bakerloo Line extension;
 Does not take into account the extra capacity requirements which would arise from the Bakerloo Line extension;
 Plans fail to provide a new ticket hall for the Bakerloo Line;
 Waste management facilities should be discrete.

Infrastructure / facilities

883. Infrastructure not sufficient to cope with the additional residents;
 Impact on local services such as GP surgeries, hospitals and schools;

Sustainability

884. Scale and prominence of proposal such that it should exceed sustainability / environmental policies, not simply comply with them;
 Failure to meet energy requirements;
 Impact upon climate change and sea levels should be considered;
 All existing trees on the LCC site should be retained;
 Impact upon flora and fauna in West Square and its gardens as a result of overshadowing.

Equalities

885. Consultation arrangements do not fulfil the council's equalities responsibilities;
 Loss of the bingo hall would have a disproportionate impact upon older people and age is a protected characteristic under the Equalities Act (2010);
 Additional surveying required during the evenings that captures leisure users' views;

Proposal would have a disproportionate impact upon people from BAME backgrounds and no affordable retail space or relocation strategy is proposed;
 The council's 9 May 2017 Cabinet Report has not given full regard to the impact of the closure of the bingo hall on groups with protected characteristics or on the wider community as it refers to the applicant agreeing a way forward with the bingo hall owner but no meaningful discussions have taken place;
 The loss of the bingo would have a significant effect on patrons and the wider community who rely on it for socialising;
 The Cabinet report does not propose any mitigation for the loss of the bingo;
 A strategy for relocation and compensation must be in place in a timely manner to ensure continued trading and certainty for traders and residents before permission is granted;
 Contrary to the NPPF;
 No equalities surveying of the bowling has been undertaken;
 The traders' own equality survey shows that 41% of the Latin businesses are run by women – officer response – The equality analysis considers the issue of gender, but only identifies issues in relation to age and race;
 No consideration given to the type of other music venues in the area and La Bodeguita and La Distriandina cater specifically for a Latin American audience;
 Survey data for the bowling alley shows it is used by predominantly non-white residents which raises equality issues.

Socio-economics

886. ES fails to justify the loss of leisure, retail and commercial floorspace through the necessary sequential test and how the considerations have positively influenced the scheme;
 Insufficient comparison is made between the existing and proposed economic mix and business types given that application does not distinguish between A and B1 use;
 Demolition and construction impacts not adequately assessed given absence of relocation strategy;

Fire safety

887. Tower blocks over 10 storeys with only one staircase are dangerous and raise difficulties in containing fires and evacuating residents;
 The Planning Committee must satisfy itself that all of the tall buildings proposed would be safe, including in its design and use of materials;
 Fire safety is too important an issue to be left to the inadequate building regulations regime.
 More tower blocks are not safe or desirable in the wake of the Grenfell Tower disaster;
 The Royal Institute of British Architects (RIBA) has recommended to the inquiry into the Grenfell disaster that buildings over three storeys should have more than one vertical means of escape.

Other matters

888. Lack of consultation, and no documents were produced in Spanish;
 Lack of information about how the applicant will maintain and sustain the shopping centre until closure;
 The towers on the LCC site did not form part of the pre-application consultation;
 None of the concerns raised during pre-application consultation have been addressed;
 Consultation carried out over Christmas;
 The existing shopping centre is difficult for people with disabilities to access;

Consultations on planning application sent out over Christmas when people are likely to be away;

One the Elephant should be visited so that the impact can be assessed ;

Additional information required regarding public consultation methodology used;

Consultation letters not sent to 1 Gabriel Walk (One the Elephant) – officer response – additional notification letters were subsequently sent;

Impact upon property values – officer response – this is not a material planning consideration and cannot be taken into account;

The site address for the planning application only refers to the shopping centre and the LCC building, and it does not include the Coronet and other buildings separate to the shopping centre. Re-consultation should therefore be undertaken to clarify this – officer response – in agreement with the applicant the address has been changed to include these properties. The plans and documents for the application clearly show all of the land to which the application relates;

A former Southwark Councillor is now employed by the applicant and working on the application;

Aylesbury Estate CPO was refused by the Secretary of State;

Despite a formal request, the council's pre-application advice has not been posted online and this is required to understand how the scheme has evolved including inclusion of the LCC site – officer response – the council's procedure is to send the pre-application advice to those who have requested it, was is the case in this instance;

No copy of the Planning Performance Agreement (PPA) with the council has been posted online – officer response – it is not the council's procedure to post PPAs online or to make them available to third parties;

Is a money making opportunity for LCC;

The applicant uses off-shore shell companies to avoid paying tax – the council should not make policy concessions to support developers who do not pay tax;

The wishes of residents are being ignored which is undemocratic and damaging to the council's reputation;

Some residents within the West Square Conservation Area have not been consulted on the application – officer response – Details of consultation carried out on the application is set out at Appendix 1 of the officer report;

Question the tax purposes of Get Living London.

The Committee's original objections to the proposal should still stand at its meeting on 30th January.

889. Representations have been received from 12 properties commenting on the application as follows:

Question whether St George's Buildings would be affected by the proposal;

Question the duration of the construction works;

Construction impacts;

Loss of light and overshadowing;

Lack of parking;

Lack of consideration of additional community facilities needed to support additional residents;

Press coverage about a Colombian market in north London being demolished;

Traffic should be considered and a bridge or subway provided;

A Wesfield-type shopping centre should be provided which would act as a centre for socio-commerce south of the river.

Second round of consultation

890. Notification letters were sent to all of the same properties and consultees notified of

the original application together with people / groups not originally notified but who commented on the application. New site notices were displayed and the proposal was advertised in the press. All gave a 28 day period for comment.

891. 516 representations were received following re-consultation objecting to the application. New issues raised are:

Additional images submitted of the Tabernacle demonstrate the harm which would be caused to its setting;
 Revised / additional information not available on the council's website when the re-consultation started ;
 No further information has been submitted addressing impact upon light to properties on Oswin Street;
 The mansion block should be set back and reduced in size;
 Landscape improvements should be made along Oswin Street including new planting and granite paving;
 Amendments do not address original concerns raised;
 There should be revised separation distance guidelines to protect privacy, views and outlook for tall buildings;
 The wind tunnel testing should be independently verified, as wind tunnels could result in injuries, deaths and expensive lawsuits;
 Re-consultation took place over August when people are on holiday (officer response – the consultation period was extended from 21 to 28 days, and representations may be received and taken into account after the consultation period has ended);
 Other developments in the area have not been well managed by the council and developers have been able to pursue their interest, contrary to planning policies;
 The draft local business support and relocation strategy is not suitable for operator of the bingo hall and bowling alley and they are unlikely to quality for support;
 Equality issues relating to the loss of the bingo hall and bowling alley have not been addressed and deferring this to a s106 agreement would not give the council a full opportunity to consider the impacts;
 Affordable housing proposal remains unacceptable;
 Plans must be put in place to ensure that none of the proposed flats are allowed to remain vacant;
 Intimidation by managing agents of the shopping centre;
 The draft local business support and relocation strategy fails to address equalities issues and has not been prepared in consultation with traders; does not give prioritised return for existing traders and disregards their desire to cluster;
 Would fail to deliver a fully integrated transport system;
 The application should not be considered, given how unacceptable it is;
 When permission was granted to turn open space at the LCC site to parking, assurances were given that the open nature of the space would be preserved;
 Impact upon sewers;
 Neighbouring developments are poorly serviced;
 Impact of servicing upon Oswin Street;
 Proposal does not address that overshadowing and loss of light would require additional heating to neighbouring buildings.

892. A further 22 representations were received in support of the application following re-consultation.

The development should proceed, for the benefit of all of the community, not just ethnic minorities;
 The Tabernacle is already surrounded by tall buildings;

The existing shopping centre spoils the new housing being developed around it;
Should consider the needs of people moving into the area;
People living in the area have to travel out of the area to find suitable social activities.

893. A further 2 representations commenting on the application were received following re-consultation, raising the following new issues:

Building heights on the west site should be reduced, but could be increased on the east site if required for viability reasons;
Cautiously optimistic about the Draft Local Business Support and Relocation Strategy which includes affordable retail space, but it should be increased to 10%;
The council should be especially alert to ensuring that the affordable retail obligations are delivered.

894. On 14 November 2017 the council sent a letter to Tree Shepherd and Latin Elephant setting out the applicant's updated offer in respect of Tree Shepherd support for all businesses within the red line, the relocation fund and off-site affordable retail space contributions. Tree Shepherd and Latin Elephant disseminated this information to the traders which they represent (all within the red line in the case of Tree Shepherd), and gave an additional 14 days to make any comments.

Responses received

895. An objection has been received from Latin Elephant raising the following concerns.

The offer by the developer has not been formulated in consultation with the traders and local organisations – they should be involved in formulating the relocation strategy and subsequently have input into the s106 agreement;
Separate fund require for loss of trade during relocation period;
Still no clarity over the timing of the relocation strategy;
Question how the off-site affordable retail contribution has been calculated;
Object to the discretionary use of the fund. Allocation criteria is required which traders should be involved in;
Relocation fund could end up all being spent on surveyors and solicitors;
Concerned that the relocation fund would be used to create retail space at Perronet House, with nothing left for displacement costs;
Perronet garages not large enough to accommodate all independent businesses affected;
Concerns over suitability of Perronet garages for retail and model of proposal not shown to traders;
Concerns regarding the suitability of Arch Street for retail space;
Lack of opportunities to cluster;
Lack of information as to when the affordable retail units at Elephant One would be available, the rent levels and eligibility criteria;
Is still no list of available units in the area;
No commitment to existing traders having priority for the on-site affordable retail;
Lack of information regarding a potential CPO;
Additional Tree Shepherd support has not been adequately conveyed.

896. A 27 signature petition has been received objecting to the application on the following grounds:

Traders not given enough time to analyse the applicant's updated offer;
BAME, independent traders want to be involved in drafting the relocation strategy and

have been left out;

Updated proposal still vague;

Amounts for the relocation fund and provision of affordable retail units are not sufficient and question how they have been calculated and criteria behind it;

Question why the council has not insisted on 10% on-site affordable retail;

Relocation fund should be tripled, with £100k per unit;

Question why relocation fund would be discretionary / criteria for allocation / who gets what / should be a transparent process;

Question whether business size and length of trading in the shopping centre would be considered;

Relocation fund should not be destined for council commissioned professionals (surveyors etc); traders should have freedom of choice;

Question if the relocation fund would be used to convert Perronett House garages to retail space;

Updated proposal does not specify how much of the money would go to Tree Shepherd;

Question when list of available units would be published;

Traders have not been shown Arch Street proposals and question its suitability;

No reference to units in Elephant One including when they would be available and criteria for renting a unit;

Question suitability of Perronet House for retail – traders have not seen full details;

No commitment to guaranteed right to return to the site;

Council Officers confirmed that negotiations would be in line with the 'Business Continuity Charter' but are now advised that it was an aspiration which was never taken forward;

Concerned that the council has written to traders requiring information for a potential CPO, but there is no agreed relocation strategy yet.

897. A further 8 representations have been received following this most recent round of consultation objecting to the application on the following grounds:

Relocation strategy focusses on retail only and does not address the needs of the existing leisure operators;

Parking is required for the shopping centre, particularly for older people.

Third round of consultation (final)

898. Notification letters were sent to all of the same properties and consultees notified of the original application together with people / groups not originally notified but who commented on the application. New site notices were displayed and the proposal was advertised in the press. All gave a 28 day period for comment.

899. 8 representations have been received in support of the application, citing the following new grounds:

- Have waited a long time for this redevelopment of a property no longer fit for purpose, and economic conditions to support a significantly revised development at some future date cannot necessarily be relied upon.

- Understand there was opposition at the committee meeting, but should be considering the benefits of the development to the wider Southwark residents who may have been less visible than opposing protestors.

- Objections driven by two ongoing campaigns which do not represent all residents.

- Would provide a large amount of housing in zone 1 where currently there is no

housing, close to jobs which is a good example of sustainable development.

- Improvement to retail and public realm will encourage people to shop and socialise locally.
- Must be realistic about what a developer can commit to as part of a single project.
- Would deliver a new location for LCC and a new tube station.
- Objections are largely cut and paste duplicates.
- Pre-application consultation showed 90% of respondents were in favour of / supported the plans.
- The area will not be able to compete with other zone 1 locations.
- Will increase the number of visitors to the area.
- The proposal would be right for the long term health of the borough;
- Welcome first refusal of some of the leisure space to a bingo operator;
- The listed buildings in the area would be enhanced by the demolition of the shopping centre;
- A lot of the local businesses should remain in the shopping centre;
- Existing shopping centre unsafe at night and subject to anti-social behaviour, including the area containing the market stalls;
- The proposal would provide new housing including affordable housing, on a site where there is currently no housing;
- The popularity of bingo has deteriorated over the years;
- New and existing residents should have a new shopping centre and leisure facilities;
- Social rented housing has been increased;
- Traders have been adequately provided for through the relocation fund;
- An equality analysis has been undertaken;
- Satisfied with the concessions made by the developer in 2018.
- Good opportunity provided enough affordable homes are provided to maintain a social balance.
- Notwithstanding objections, should not lose sight of the dire state of the existing infrastructure.
- Progress not possible without change. Better to let development progress than for site to continue to deteriorate.

900. 92 representations have been received objecting to the application on the following new grounds:

Land use

Loss of the bingo would result in a shortfall against predicted demand;

A theatre should be provided rather than a bingo hall;

Unclear whether the music venue would become a bingo hall;

Limited discussions with bingo operator and no suitable relocations for bingo and bowling identified;

Proposed leisure space would be too small for a bingo operator;

Bingo operator may not be able to afford the leisure space on commercial terms;

No case made for additional retail floorspace;

The Draft Local Business Support and Relocation Strategy is no longer valid owing to the changes to affordable retail provision;

The Coronet Theatre is a 'receiving house' not a nightclub and regularly hosted live music, theatre, cabaret and sports nights;

Extending retail onto the west site would undermine its use for religious and residential purposes and would not enhance the adjoining conservation area;

Welcome trader relocation sites in Elephant Park and Perronet House, but not further afield;

Temporary retail facility on Castle Square would be too small;

Uncertainty about trader relocation sites not owned by the developer and which may require planning permission;
 Replacement retail units would be smaller than those which traders currently operate from;
 Trader compensation package should be triple what has been offered, and approximately £100k per business;
 Question how the relocation fund has been calculated;
 Applicant is not renewing the lease of a bank within the shopping centre;
 Traders and Latin American community must be accommodated on the same rental agreements;

Density

London Plan density policy not referred to.

Housing / affordable housing

Only a 20 year covenant is proposed for the PRS, not the required 30 years;
 Revised affordable housing offer still not policy compliant.
 Ownership and management arrangements for mansion blocks unclear;
 Grant funding is referred to for additional social rented units, but the viability review appears uncertain;
 Option for a build to sell scheme undermines the developer's viability appraisal;
 Affordable units would only be backed up by a 30 year covenant and not at all if they were build to sell – officer response – the affordable units would remain affordable in perpetuity. The 30 year covenant relates to market PRS homes.
 Reduction in London Living Rent units;

Design

Listing application submitted for shopping centre;
 Potential for inappropriate signage if the music venue became a bingo hall;
 There have been no changes to the massing of the proposed buildings.

Amenity

Proposal would create a new route from Elephant and Castle to Oswin Street resulting in noise and disturbance, anti-social behaviour and lack of privacy;
 Education building should be set further into the site to improve privacy for Metro Central Heights.

Transport

Inadequate transport assessment, unacceptable arrangements for servicing and deliveries and concerns regarding funding of the Northern Line Ticket Hall;
 Many vehicles would use Pastor Street;
 Construction management plan has not been updated to only allow construction vehicles to use the southern part of Oswin Street;

Sustainability

High rise office buildings use more than low rise buildings and have higher carbon emissions.

Other matters

The applicant should commit to pay UK tax on profits from the scheme;
 No multi-lingual person has been based at Tree Shepherd or the Delancey unit, and there is no support for traders with disabilities;
 Poor treatment by the applicant of homeless people using the shopping centre;
 People are charged to use the WCs in the shopping centre.

3 comments have been received, but do not raise any new issues.

Human rights implications

901. 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.
902. This application has the legitimate aim of providing a comprehensive mixed-use development on the site. 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/1512-Q Application file: 16/AP/4458 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 5410 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning		
Report Authors	Victoria Lewis / Michael Glasgow / Bridin O'Connor		
Version	Final		
Dated	14 June 2018		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments included	
Strategic Director of Finance and Governance	No	No	
Strategic Director of Environment and Social Regeneration	No	No	
Strategic Director of Housing and Modernisation	No	No	
Director of Regeneration	No	No	
Date final report sent to Constitutional Team		21 June 2018	

APPENDIX 1**Consultation undertaken****Site notice date:** 20/12/2016**Press notice date:** 15/02/2018**Case officer site visit date:** n/a**Neighbour consultation letters sent:** 20/12/2016**Internal services consulted:**

Ecology Officer
 Economic Development Team
 Environmental Protection Team Surgery [Noise / Air Quality / Land Contamination / Ventilation]
 Flood and Drainage Team
 HIGHWAY LICENSING
 Highway Development Management
 Housing Regeneration Initiatives
 Public Health Team
 Waste Management

Statutory and non-statutory organisations consulted:

Arqiva - digital communications
 City Of London
 City of Westminster
 Civil Aviation Authority
 Council for British Archaeology
 EDF Energy
 Environment Agency
 Greater London Authority
 Health & Safety Executive
 Historic England
 London Borough of Bromley
 London Borough of Croydon
 London Borough of Haringey
 London Borough of Islington
 London Borough of Lambeth
 London Borough of Lewisham
 London Fire & Emergency Planning Authority
 London Overground
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 National Grid UK Transmission
 National Planning Casework Unit
 Natural England - London Region & South East Region
 Network Rail (Planning)
 Thames Water - Development Planning
 The Georgian Group

The Royal Parks
 The Theatres Trust
 The Victorian Society
 Transport for London (referable & non-referable app notifications and pre-apps)
 Twentieth Century Society

Neighbour and local groups consulted:

Internal services consulted:

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 London Borough of Croydon
 London Borough of Haringey
 London Borough of Islington
 London Borough of Lambeth
 London Borough of Lewisham
 London Fire & Emergency Planning Authority
 London Overground
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 National Grid UK Transmission
 National Planning Casework Unit
 Natural England - London Region & South East Region
 Network Rail (Planning)
 Thames Water - Development Planning
 The Georgian Group
 The Royal Parks
 The Theatres Trust
 The Victorian Society
 Transport for London (referable & non-referable app notifications and pre-apps)
 Twentieth Century Society

Neighbour and local groups consulted:

By Email

127 Brook Drive London SE11 4TQ
 119 Brook Drive London SE11 4TQ
 121 Brook Drive London SE11 4TQ
 135 Brook Drive London SE11 4TQ
 149 Brook Drive London SE11 4TQ
 133 Brook Drive London SE11 4TQ
 181 Brook Drive London SE11 4TG
 183 Brook Drive London SE11 4TG
 171 Brook Drive London SE11 4TG
 179 Brook Drive London SE11 4TG
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 101 Brook Drive London SE11 4TU
 6 Harmsworth Mews London SE11 4SQ
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 Flat B 11 Austral Street SE11 4SJ
 Basement Flat 28 West Square SE11 4SP
 Flat A 11 Austral Street SE11 4SJ
 91 Brook Drive London SE11 4TU
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 Flat 95 Albert Barnes House SE1 6PJ
 Flat 99 Albert Barnes House SE1 6PJ
 Brotherhood Of The Cross And Star Falmouth Road SE1 6RT
 Flat 98 Albert Barnes House SE1 6PJ
 Flat 96 Albert Barnes House SE1 6PJ
 Flat 97 Albert Barnes House SE1 6PJ
 Flat 89 Albert Barnes House SE1 6PJ
 Flat 81 Albert Barnes House SE1 6PJ
 Flat 82 Albert Barnes House SE1 6PJ
 Flat 80 Albert Barnes House SE1 6PJ
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 Flat 79 Albert Barnes House SE1 6PJ
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 Flat 87 Albert Barnes House SE1 6PJ
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 Flat 84 Albert Barnes House SE1 6PJ
 Flat 85 Albert Barnes House SE1 6PJ
 Flat 54 Albert Barnes House SE1 6PJ
 Flat 3 Albert Barnes House SE1 6PH
 Flat 30 Albert Barnes House SE1 6PH
 Flat 29 Albert Barnes House SE1 6PH
 Flat 27 Albert Barnes House SE1 6PH
 Flat 28 Albert Barnes House SE1 6PH
 Flat 31 Albert Barnes House SE1 6PH
 Flat 35 Albert Barnes House SE1 6PH
 Flat 36 Albert Barnes House SE1 6PH
 Flat 34 Albert Barnes House SE1 6PH
 Flat 32 Albert Barnes House SE1 6PH
 Flat 33 Albert Barnes House SE1 6PH

37 Hayles Street London SE11 4SU
 39 Hayles Street London SE11 4SU
 59 Hayles Street London SE11 4SU
 52 Hayles Street London SE11 4SX
 54 Hayles Street London SE11 4SX
 48 Hayles Street London SE11 4SX
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 61 Hayles Street London SE11 4SU
 44 Hayles Street London SE11 4SX
 46 Hayles Street London SE11 4SX
 40 Hayles Street London SE11 4SX
 42 Hayles Street London SE11 4SX
 57 Hayles Buildings Elliotts Row SE11 4TD
 35 Oswin Street London SE11 4TF
 6a Austral Street London SE11 4SJ
 141b Brook Drive London SE11 4TQ
 Flat 3 95 Brook Drive SE11 4TU
 Ground Flat 97 Brook Drive SE11 4TU
 93 Brook Drive London SE11 4TU
 Flat 2 95 Brook Drive SE11 4TU
 21a Austral Street London SE11 4SJ
 21b Austral Street London SE11 4SJ
 13 West Square London SE11 4SN
 17 West Square London SE11 4SN
 129b Brook Drive London SE11 4TQ
 141a Brook Drive London SE11 4TQ
 165a Brook Drive London SE11 4TG
 Flat 4 129 Southampton Way SE5 7EW
 First Floor Flat 97 Brook Drive SE11 4TU
 Middle Floor Flat 25 Oswin Street SE11 4TF
 First Floor Flat 28 West Square SE11 4SP
 First Floor Flat 15 Austral Street SE11 4SJ
 First Floor Flat Southwark Citadel SE1 6HH
 27 Oswin Street London SE11 4TF
 Flat 2 5 Oswin Street SE11 4TF
 First Floor Flat 9 Austral Street SE11 4SJ
 Flat 1 3-5 Oswin Street SE11 4TF
 14 West Square London SE11 4SN
 22a Hayles Street London SE11 4SS
 Top Floor 97 Brook Drive SE11 4TU
 Flat 1 95 Brook Drive SE11 4TU
 Top Flat 17 Oswin Street SE11 4TF
 Flat B 37 Oswin Street SE11 4TF
 22b Hayles Street London SE11 4SS
 First Floor And Second Floor Flat 63 Elliotts Row SE11 4SZ
 15 Hedger Street London SE11 4ST
 17 Hedger Street London SE11 4ST
 11 Hedger Street London SE11 4ST
 13 Hedger Street London SE11 4ST
 4 Orient Street London SE11 4SR
 6 Orient Street London SE11 4SR
 19 Hedger Street London SE11 4ST
 2 Orient Street London SE11 4SR
 33 Oswin Street London SE11 4TF
 1 Hedger Street London SE11 4ST
 Flat 37 71-89 Brook Drive SE11 4TR
 Flat 38 71-89 Brook Drive SE11 4TR
 7 Hedger Street London SE11 4ST
 9 Hedger Street London SE11 4ST
 3 Hedger Street London SE11 4ST
 5 Hedger Street London SE11 4ST
 8 Orient Street London SE11 4SR
 Flat 3 Two Eagles House SE11 4TQ
 Flat 4 Two Eagles House SE11 4TQ
 Flat 1 Two Eagles House SE11 4TQ
 Flat 2 Two Eagles House SE11 4TQ
 119d Brook Drive London SE11 4TQ
 11 West Square London SE11 4SN
 119a Brook Drive London SE11 4TQ
 Flat 26 Albert Barnes House SE1 6PH
 Flat 19 Albert Barnes House SE1 6PH
 Flat 2 Albert Barnes House SE1 6PH
 Flat 18 Albert Barnes House SE1 6PH
 Flat 16 Albert Barnes House SE1 6PH
 Flat 17 Albert Barnes House SE1 6PH
 Flat 20 Albert Barnes House SE1 6PH
 Flat 24 Albert Barnes House SE1 6PH
 Flat 25 Albert Barnes House SE1 6PH
 Flat 23 Albert Barnes House SE1 6PH
 Flat 21 Albert Barnes House SE1 6PH
 Flat 22 Albert Barnes House SE1 6PH
 Flat 6 Albert Barnes House SE1 6PH
 Flat 7 Albert Barnes House SE1 6PH
 Flat 5 Albert Barnes House SE1 6PH
 Flat 48 Albert Barnes House SE1 6PH
 Flat 49 Albert Barnes House SE1 6PH
 Flat 8 Albert Barnes House SE1 6PH
 Flat 52 Albert Barnes House SE1 6PJ
 Flat 53 Albert Barnes House SE1 6PJ
 Flat 51 Albert Barnes House SE1 6PJ
 Flat 9 Albert Barnes House SE1 6PH
 Flat 50 Albert Barnes House SE1 6PJ
 Flat 47 Albert Barnes House SE1 6PH
 Flat 4 Albert Barnes House SE1 6PH
 Flat 40 Albert Barnes House SE1 6PH
 Flat 39 Albert Barnes House SE1 6PH
 Flat 37 Albert Barnes House SE1 6PH
 Flat 38 Albert Barnes House SE1 6PH
 Flat 41 Albert Barnes House SE1 6PH
 Flat 45 Albert Barnes House SE1 6PH
 Flat 46 Albert Barnes House SE1 6PH
 Flat 44 Albert Barnes House SE1 6PH
 Flat 42 Albert Barnes House SE1 6PH
 Flat 43 Albert Barnes House SE1 6PH
 398 Metro Central Heights 119 Newington Causeway SE1 6DX
 405 Metro Central Heights 119 Newington Causeway SE1 6DX
 390 Metro Central Heights 119 Newington Causeway SE1 6DX
 359 Metro Central Heights 119 Newington Causeway SE1 6DQ
 383 Metro Central Heights 119 Newington Causeway SE1 6DX
 412 Metro Central Heights 119 Newington Causeway SE1 6DX
 378a Metro Central Heights 119 Newington Causeway SE1 6DX
 379a Metro Central Heights 119 Newington Causeway SE1 6DX
 368a Metro Central Heights 119 Newington Causeway SE1 6DX
 348a Metro Central Heights 119 Newington Causeway SE1 6DQ
 358a Metro Central Heights 119 Newington Causeway SE1 6DQ
 352 Metro Central Heights 119 Newington Causeway SE1 6DQ
 277 Metro Central Heights 119 Newington Causeway SE1 6BX
 284 Metro Central Heights 119 Newington Causeway SE1 6DB
 253 Metro Central Heights 119 Newington Causeway SE1 6BX
 239 Metro Central Heights 119 Newington Causeway SE1 6BX
 246 Metro Central Heights 119 Newington Causeway SE1 6BX
 292 Metro Central Heights 119 Newington Causeway SE1 6DB
 337 Metro Central Heights 119 Newington Causeway SE1 6DQ
 345 Metro Central Heights 119 Newington Causeway SE1 6DQ
 330 Metro Central Heights 119 Newington Causeway SE1 6DQ
 299 Metro Central Heights 119 Newington Causeway SE1 6DB
 306 Metro Central Heights 119 Newington Causeway SE1 6DB
 Flat 19 83 New Kent Road SE1 6RD
 Flat 2 83 New Kent Road SE1 6RD
 Flat 18 83 New Kent Road SE1 6RD
 Flat 16 83 New Kent Road SE1 6RD
 Flat 17 83 New Kent Road SE1 6RD
 Flat 20 83 New Kent Road SE1 6RD
 Flat 6 83 New Kent Road SE1 6RD
 Flat 7 83 New Kent Road SE1 6RD
 Flat 5 83 New Kent Road SE1 6RD
 Flat 3 83 New Kent Road SE1 6RD
 Flat 4 83 New Kent Road SE1 6RD
 Flat 15 83 New Kent Road SE1 6RD
 409a Metro Central Heights 119 Newington Causeway SE1 6DX
 Elephant And Castle Railway Station Elephant Road SE17 1LB
 399a Metro Central Heights 119 Newington Causeway SE1 6DX
 389a Metro Central Heights 119 Newington Causeway SE1 6DX

119b Brook Drive London SE11 4TQ
 19 West Square London SE11 4SN
 7 West Square London SE11 4SN
 18 West Square London SE11 4SN
 8 West Square London SE11 4SN
 16 West Square London SE11 4SN
 15 West Square London SE11 4SN
 6 West Square London SE11 4SN
 12 West Square London SE11 4SN
 Flat 3 5 Oswin Street SE11 4TF
 Middle Flat 17 Oswin Street SE11 4TF
 Flat A 37 Oswin Street SE11 4TF
 Top Floor Flat 25 Oswin Street SE11 4TF
 Ground Floor Flat 7 Oswin Street SE11 4TF
 Ground Floor Flat 25 Oswin Street SE11 4TF
 Ground Floor Flat 28 West Square SE11 4SP
 Ground Floor Flat 9 Hayles Street SE11 4SU
 Ground Floor Flat 15 Austral Street SE11 4SJ
 Flat 6 5 Oswin Street SE11 4TF
 Flat 7 5 Oswin Street SE11 4TF
 Flat 4 5 Oswin Street SE11 4TF
 Flat 5 5 Oswin Street SE11 4TF
 First Floor And Second Floor Flat 25 Gaywood Street SE1 6HG
 First Floor And Second Floor Flat 9 Hayles Street SE11 4SU
 Basement Flat 25 West Square SE11 4SP
 Basement And Ground Floor Flat 25 Gaywood Street SE1 6HG
 Ground Floor Flat 9 Austral Street SE11 4SJ
 Unit 5 Perronet House Gaywood Estate SE1 6JR
 Basement And Part Ground Floor 21 St Georges Road SE1 6ES
 Southwark College West Square SE11 4SN
 First Floor 21 St Georges Road SE1 6ES
 Charlotte Sharman Primary School West Square SE11 4SN
 Second Floor Flat 28 West Square SE11 4SP
 Second Floor Flat 9 Austral Street SE11 4SJ
 Second Floor And Third Floor Flat 15 Austral Street SE11 4SJ
 Flat C 37 Oswin Street SE11 4TF
 20 Metropolis Oswin Street SE11 4TF
 74 London Road London SE1 6LW
 Flat D 37 Oswin Street SE11 4TF
 Third Floor Flat 28 West Square SE11 4SP
 Flat A 109 Brook Drive SE11 4TU
 Flat B 109 Brook Drive SE11 4TU
 Flat A 107 Brook Drive SE11 4TU
 Flat B 107 Brook Drive SE11 4TU
 Flat A 115 Brook Drive SE11 4TU
 Flat B 115 Brook Drive SE11 4TU
 Flat A 113 Brook Drive SE11 4TU
 Flat B 113 Brook Drive SE11 4TU
 147a Brook Drive London SE11 4TQ
 Flat A 105 Brook Drive SE11 4TU
 143a Brook Drive London SE11 4TQ
 145a Brook Drive London SE11 4TQ
 Flat B 105 Brook Drive SE11 4TU
 Flat B 99 Brook Drive SE11 4TU
 Flat A 99 Brook Drive SE11 4TU
 Flat A 111 Brook Drive SE11 4TU
 137b Brook Drive London SE11 4TQ
 143b Brook Drive London SE11 4TQ
 125b Brook Drive London SE11 4TQ
 131b Brook Drive London SE11 4TQ
 Flat 10 71-89 Brook Drive SE11 4TR
 Flat 11 71-89 Brook Drive SE11 4TR
 145b Brook Drive London SE11 4TQ
 147b Brook Drive London SE11 4TQ
 Flat 2 65-66 Elliotts Row SE11 4SZ
 Flat 3 65-66 Elliotts Row SE11 4SZ
 Flat B 111 Brook Drive SE11 4TU
 Flat 1 65-66 Elliotts Row SE11 4SZ
 165b Brook Drive London SE11 4TG
 175b Brook Drive London SE11 4TG
 Flat 4 65-66 Elliotts Row SE11 4SZ
 398a Metro Central Heights 119 Newington Causeway SE1 6DX
 Flat 1 83 New Kent Road SE1 6RD
 Flat 13 83 New Kent Road SE1 6RD
 Flat 14 83 New Kent Road SE1 6RD
 Flat 12 83 New Kent Road SE1 6RD
 Flat 10 83 New Kent Road SE1 6RD
 Flat 11 83 New Kent Road SE1 6RD
 231 Metro Central Heights 119 Newington Causeway SE1 6BX
 399 Metro Central Heights 119 Newington Causeway SE1 6DX
 400 Metro Central Heights 119 Newington Causeway SE1 6DX
 397 Metro Central Heights 119 Newington Causeway SE1 6DX
 395 Metro Central Heights 119 Newington Causeway SE1 6DX
 396 Metro Central Heights 119 Newington Causeway SE1 6DX
 401 Metro Central Heights 119 Newington Causeway SE1 6DX
 406 Metro Central Heights 119 Newington Causeway SE1 6DX
 407 Metro Central Heights 119 Newington Causeway SE1 6DX
 404 Metro Central Heights 119 Newington Causeway SE1 6DX
 402 Metro Central Heights 119 Newington Causeway SE1 6DX
 403 Metro Central Heights 119 Newington Causeway SE1 6DX
 394 Metro Central Heights 119 Newington Causeway SE1 6DX
 385 Metro Central Heights 119 Newington Causeway SE1 6DX
 386 Metro Central Heights 119 Newington Causeway SE1 6DX
 384 Metro Central Heights 119 Newington Causeway SE1 6DX
 381 Metro Central Heights 119 Newington Causeway SE1 6DX
 382 Metro Central Heights 119 Newington Causeway SE1 6DX
 387 Metro Central Heights 119 Newington Causeway SE1 6DX
 392 Metro Central Heights 119 Newington Causeway SE1 6DX
 393 Metro Central Heights 119 Newington Causeway SE1 6DX
 391 Metro Central Heights 119 Newington Causeway SE1 6DX
 388 Metro Central Heights 119 Newington Causeway SE1 6DX
 389 Metro Central Heights 119 Newington Causeway SE1 6DX
 140 Metro Central Heights 119 Newington Causeway SE1 6BT
 147 Metro Central Heights 119 Newington Causeway SE1 6BT
 133 Metro Central Heights 119 Newington Causeway SE1 6BB
 118 Metro Central Heights 119 Newington Causeway SE1 6BB
 125 Metro Central Heights 119 Newington Causeway SE1 6BB
 171 Metro Central Heights 119 Newington Causeway SE1 6BT
 200 Metro Central Heights 119 Newington Causeway SE1 6BW
 224 Metro Central Heights 119 Newington Causeway SE1 6BW
 193 Metro Central Heights 119 Newington Causeway SE1 6BW
 178 Metro Central Heights 119 Newington Causeway SE1 6BT
 186 Metro Central Heights 119 Newington Causeway SE1 6BT
 89 Metro Central Heights 119 Newington Causeway SE1 6BB
 411 Metro Central Heights 119 Newington Causeway SE1 6DX
 413 Metro Central Heights 119 Newington Causeway SE1 6DX
 410 Metro Central Heights 119 Newington Causeway SE1 6DX
 408 Metro Central Heights 119 Newington Causeway SE1 6DX
 409 Metro Central Heights 119 Newington Causeway SE1 6DX
 23 Metro Central Heights 119 Newington Causeway SE1 6BA
 75 Metro Central Heights 119 Newington Causeway SE1 6BB
 82 Metro Central Heights 119 Newington Causeway SE1 6BB
 67 Metro Central Heights 119 Newington Causeway SE1 6BA
 30 Metro Central Heights 119 Newington Causeway SE1 6BA
 37 Metro Central Heights 119 Newington Causeway SE1 6BA
 Unit 7 Farrell Court SE17 1LB
 Unit 8 Farrell Court SE17 1LB
 Unit 6 Farrell Court SE17 1LB
 Unit 2 Farrell Court SE17 1LB
 Unit 3 Farrell Court SE17 1LB
 Unit 5 Metro Central Heights SE1 6BN
 Coronet Cinema 28 New Kent Road SE1 6TJ
 Railway Arch 108 New Kent Road SE1 6TJ
 Unit 1 Farrell Court SE17 1LB
 Flat 49 Smeaton Court SE1 6PF
 Flat 50 Smeaton Court SE1 6PF
 Flat 48 Smeaton Court SE1 6PF
 Flat 46 Smeaton Court SE1 6PF
 Flat 47 Smeaton Court SE1 6PF
 Flat 51 Smeaton Court SE1 6PF
 Railway Arch 109 Elephant Road SE17 1LB
 Railway Arches 111 To 113 Elephant Road SE17 1LB

161b Brook Drive London SE11 4TG
 68 Hayles Buildings Elliotts Row SE11 4TD
 69 Hayles Buildings Elliotts Row SE11 4TD
 66 Hayles Buildings Elliotts Row SE11 4TD
 67 Hayles Buildings Elliotts Row SE11 4TD
 72 Hayles Buildings Elliotts Row SE11 4TD
 73 Hayles Buildings Elliotts Row SE11 4TD
 70 Hayles Buildings Elliotts Row SE11 4TD
 71 Hayles Buildings Elliotts Row SE11 4TD
 60 Hayles Buildings Elliotts Row SE11 4TD
 61 Hayles Buildings Elliotts Row SE11 4TD
 58 Hayles Buildings Elliotts Row SE11 4TD
 59 Hayles Buildings Elliotts Row SE11 4TD
 64 Hayles Buildings Elliotts Row SE11 4TD
 65 Hayles Buildings Elliotts Row SE11 4TD
 62 Hayles Buildings Elliotts Row SE11 4TD
 63 Hayles Buildings Elliotts Row SE11 4TD
 74 Hayles Buildings Elliotts Row SE11 4TD
 161a Brook Drive London SE11 4TG
 175a Brook Drive London SE11 4TG
 83 Hayles Buildings Elliotts Row SE11 4TD
 84 Hayles Buildings Elliotts Row SE11 4TD
 137a Brook Drive London SE11 4TQ
 139a Brook Drive London SE11 4TQ
 125a Brook Drive London SE11 4TQ
 131a Brook Drive London SE11 4TQ
 77 Hayles Buildings Elliotts Row SE11 4TD
 78 Hayles Buildings Elliotts Row SE11 4TD
 75 Hayles Buildings Elliotts Row SE11 4TD
 76 Hayles Buildings Elliotts Row SE11 4TD
 81 Hayles Buildings Elliotts Row SE11 4TD
 82 Hayles Buildings Elliotts Row SE11 4TD
 79 Hayles Buildings Elliotts Row SE11 4TD
 80 Hayles Buildings Elliotts Row SE11 4TD
 Flat 12 71-89 Brook Drive SE11 4TR
 13 Orient Street London SE11 4SR
 47 West Square London SE11 4SP
 19 Metropolis Oswin Street SE11 4TF
 34 West Square London SE11 4SP
 193 Brook Drive London SE11 4TG
 19 Orient Street London SE11 4SR
 173 Brook Drive London SE11 4TG
 12 Metropolis Oswin Street SE11 4TF
 14 Metropolis Oswin Street SE11 4TF
 10 Metropolis Oswin Street SE11 4TF
 11 Metropolis Oswin Street SE11 4TF
 17 Metropolis Oswin Street SE11 4TF
 18 Metropolis Oswin Street SE11 4TF
 15 Metropolis Oswin Street SE11 4TF
 16 Metropolis Oswin Street SE11 4TF
 139b Brook Drive London SE11 4TQ
 Flat 31 71-89 Brook Drive SE11 4TR
 Flat 32 71-89 Brook Drive SE11 4TR
 Flat 29 71-89 Brook Drive SE11 4TR
 Flat 30 71-89 Brook Drive SE11 4TR
 Flat 35 71-89 Brook Drive SE11 4TR
 Flat 36 71-89 Brook Drive SE11 4TR
 Flat 33 71-89 Brook Drive SE11 4TR
 Flat 34 71-89 Brook Drive SE11 4TR
 Flat 23 71-89 Brook Drive SE11 4TR
 Flat 24 71-89 Brook Drive SE11 4TR
 Flat 21 71-89 Brook Drive SE11 4TR
 Flat 22 71-89 Brook Drive SE11 4TR
 Flat 27 71-89 Brook Drive SE11 4TR
 Flat 28 71-89 Brook Drive SE11 4TR
 Flat 25 71-89 Brook Drive SE11 4TR
 Flat 26 71-89 Brook Drive SE11 4TR
 Flat 3 71-89 Brook Drive SE11 4TR
 Flat 4 71-89 Brook Drive SE11 4TR
 Flat 20 71-89 Brook Drive SE11 4TR
 Flat 2 71-89 Brook Drive SE11 4TR
 Flat 7 71-89 Brook Drive SE11 4TR
 Flat 8 71-89 Brook Drive SE11 4TR
 Flat 5 71-89 Brook Drive SE11 4TR

Flat 54 Smeaton Court SE1 6PF
 Flat 52 Smeaton Court SE1 6PF
 Flat 53 Smeaton Court SE1 6PF
 Unit 2 Railway Arch 100 SE1 6PD
 Unit 3 Railway Arch 101 SE1 6PD
 Unit 1 Railway Arch 99 SE1 6PD
 1 Martin House Rockingham Street SE1 6QP
 9 Rockingham Street London SE1 6PD
 Unit 4 Railway Arch 102a SE1 6PG
 Rockingham Community Centre Falmouth Road SE1 6QP
 Flat 45 Smeaton Court SE1 6PF
 Flat 14 Smeaton Court SE1 6PF
 Flat 15 Smeaton Court SE1 6PF
 Flat 13 Smeaton Court SE1 6PF
 Flat 11 Smeaton Court SE1 6PF
 Flat 12 Smeaton Court SE1 6PF
 Flat 16 Smeaton Court SE1 6PF
 Flat 20 Smeaton Court SE1 6PF
 Flat 21 Smeaton Court SE1 6PF
 Flat 19 Smeaton Court SE1 6PF
 Flat 17 Smeaton Court SE1 6PF
 Flat 18 Smeaton Court SE1 6PF
 Flat 10 Smeaton Court SE1 6PF
 Flat 2 Smeaton Court SE1 6PF
 Flat 3 Smeaton Court SE1 6PF
 Flat 1 Smeaton Court SE1 6PF
 Flat 8 83 New Kent Road SE1 6RD
 Flat 9 83 New Kent Road SE1 6RD
 Flat 4 Smeaton Court SE1 6PF
 Flat 8 Smeaton Court SE1 6PF
 Flat 9 Smeaton Court SE1 6PF
 Flat 7 Smeaton Court SE1 6PF
 Flat 5 Smeaton Court SE1 6PF
 Flat 6 Smeaton Court SE1 6PF
 Flat 37 Smeaton Court SE1 6PF
 Flat 38 Smeaton Court SE1 6PF
 Flat 36 Smeaton Court SE1 6PF
 Flat 34 Smeaton Court SE1 6PF
 Flat 35 Smeaton Court SE1 6PF
 Flat 39 Smeaton Court SE1 6PF
 Flat 43 Smeaton Court SE1 6PF
 Flat 44 Smeaton Court SE1 6PF
 Flat 42 Smeaton Court SE1 6PF
 Flat 40 Smeaton Court SE1 6PF
 Flat 41 Smeaton Court SE1 6PF
 Flat 33 Smeaton Court SE1 6PF
 Flat 25 Smeaton Court SE1 6PF
 Flat 26 Smeaton Court SE1 6PF
 Flat 24 Smeaton Court SE1 6PF
 Flat 22 Smeaton Court SE1 6PF
 Flat 23 Smeaton Court SE1 6PF
 Flat 27 Smeaton Court SE1 6PF
 Flat 31 Smeaton Court SE1 6PF
 Flat 32 Smeaton Court SE1 6PF
 Flat 30 Smeaton Court SE1 6PF
 Flat 28 Smeaton Court SE1 6PF
 Flat 29 Smeaton Court SE1 6PF
 380 Metro Central Heights 119 Newington Causeway SE1 6DX
 244 Metro Central Heights 119 Newington Causeway SE1 6BX
 245 Metro Central Heights 119 Newington Causeway SE1 6BX
 243 Metro Central Heights 119 Newington Causeway SE1 6BX
 241 Metro Central Heights 119 Newington Causeway SE1 6BX
 242 Metro Central Heights 119 Newington Causeway SE1 6BX
 247 Metro Central Heights 119 Newington Causeway SE1 6BX
 251 Metro Central Heights 119 Newington Causeway SE1 6BX
 252 Metro Central Heights 119 Newington Causeway SE1 6BX
 250 Metro Central Heights 119 Newington Causeway SE1 6BX
 248 Metro Central Heights 119 Newington Causeway SE1 6BX
 249 Metro Central Heights 119 Newington Causeway SE1 6BX
 240 Metro Central Heights 119 Newington Causeway SE1 6BX
 230 Metro Central Heights 119 Newington Causeway SE1 6BX
 232 Metro Central Heights 119 Newington Causeway SE1 6BX
 229 Metro Central Heights 119 Newington Causeway SE1 6BX
 227 Metro Central Heights 119 Newington Causeway SE1 6BX

Flat 6 71-89 Brook Drive SE11 4TR
 Flat 15 71-89 Brook Drive SE11 4TR
 Flat 16 71-89 Brook Drive SE11 4TR
 Flat 13 71-89 Brook Drive SE11 4TR
 Flat 14 71-89 Brook Drive SE11 4TR
 Flat 18 71-89 Brook Drive SE11 4TR
 Flat 19 71-89 Brook Drive SE11 4TR
 Flat 1 71-89 Brook Drive SE11 4TR
 Flat 17 71-89 Brook Drive SE11 4TR
 Flat 9 71-89 Brook Drive SE11 4TR
 4 Metropolis Oswin Street SE11 4TF
 5 Metropolis Oswin Street SE11 4TF
 2 Metropolis Oswin Street SE11 4TF
 3 Metropolis Oswin Street SE11 4TF
 8 Metropolis Oswin Street SE11 4TF
 9 Metropolis Oswin Street SE11 4TF
 6 Metropolis Oswin Street SE11 4TF
 7 Metropolis Oswin Street SE11 4TF
 3 Temple West Mews West Square SE11 4TJ
 4 Temple West Mews West Square SE11 4TJ
 1 Temple West Mews West Square SE11 4TJ
 2 Temple West Mews West Square SE11 4TJ
 7 Temple West Mews West Square SE11 4TJ
 1 Metropolis Oswin Street SE11 4TF
 5 Temple West Mews West Square SE11 4TJ
 6 Temple West Mews West Square SE11 4TJ
 6 Copperbox Apartments 35 St Georges Road SE1 6EW
 7 Copperbox Apartments 35 St Georges Road SE1 6EW
 4 Copperbox Apartments 35 St Georges Road SE1 6EW
 5 Copperbox Apartments 35 St Georges Road SE1 6EW
 72 London Road London SE1 3PA
 Garden House 44 West Square SE11 4SP
 8 Copperbox Apartments 35 St Georges Road SE1 6EW
 55c St Georges Road London SE1 6ER
 Flat 2 189 Brook Drive SE11 4TG
 Flat 3 50 Elliotts Row SE11 4SZ
 Flat 1 189 Brook Drive SE11 4TG
 2 Copperbox Apartments 35 St Georges Road SE1 6EW
 3 Copperbox Apartments 35 St Georges Road SE1 6EW
 1 Copperbox Apartments 35 St Georges Road SE1 6EW
 Flat 1 21 Oswin Street SE11 4TF
 Skipton House 80 London Road SE1 6LH
 11 Gaywood Street London SE1 6HG
 46 St Georges Road London SE1 6ET
 2 Princess Street London SE1 6JP
 17 Gaywood Street London SE1 6HG
 19 Gaywood Street London SE1 6HG
 13 Gaywood Street London SE1 6HG
 15 Gaywood Street London SE1 6HG
 48 St Georges Road London SE1 6ET
 Flat 2 21 Oswin Street SE11 4TF
 Flat 3 21 Oswin Street SE11 4TF
 Flat 2 11 Oswin Street SE11 4TF
 Flat 3 11 Oswin Street SE11 4TF
 London Underground Ltd Elephant And Castle Underground
 Station SE1 6TG
 Flat 1 11 Oswin Street SE11 4TF
 Flat 1 Wardroper House SE1 6ET
 Flat 2 Wardroper House SE1 6ET
 Flat 5 Wardroper House SE1 6ET
 Flat 6 Wardroper House SE1 6ET
 Flat 3 Wardroper House SE1 6ET
 Flat 4 Wardroper House SE1 6ET
 10a Gaywood Street London SE1 6HG
 10b Gaywood Street London SE1 6HG
 Flat 2 49 Elliotts Row SE11 4SZ
 Flat 3 49 Elliotts Row SE11 4SZ
 Office 10 Keyworth Street SE1 6NG
 32c Elliotts Row London SE11 4SZ
 Flat 7 Wardroper House SE1 6ET
 Kiosk Outside 21 St Georges Road SE1 6ES
 Flat 1 183 Brook Drive SE11 4TG
 Flat 1 50 Elliotts Row SE11 4SZ
 Flat 2 50 Elliotts Row SE11 4SZ
 228 Metro Central Heights 119 Newington Causeway SE1 6BX
 233 Metro Central Heights 119 Newington Causeway SE1 6BX
 237 Metro Central Heights 119 Newington Causeway SE1 6BX
 238 Metro Central Heights 119 Newington Causeway SE1 6BX
 236 Metro Central Heights 119 Newington Causeway SE1 6BX
 234 Metro Central Heights 119 Newington Causeway SE1 6BX
 235 Metro Central Heights 119 Newington Causeway SE1 6BX
 269 Metro Central Heights 119 Newington Causeway SE1 6BX
 270 Metro Central Heights 119 Newington Causeway SE1 6BX
 268 Metro Central Heights 119 Newington Causeway SE1 6BX
 266 Metro Central Heights 119 Newington Causeway SE1 6BX
 267 Metro Central Heights 119 Newington Causeway SE1 6BX
 271 Metro Central Heights 119 Newington Causeway SE1 6BX
 275 Metro Central Heights 119 Newington Causeway SE1 6BX
 276 Metro Central Heights 119 Newington Causeway SE1 6BX
 274 Metro Central Heights 119 Newington Causeway SE1 6BX
 272 Metro Central Heights 119 Newington Causeway SE1 6BX
 273 Metro Central Heights 119 Newington Causeway SE1 6BX
 265 Metro Central Heights 119 Newington Causeway SE1 6BX
 257 Metro Central Heights 119 Newington Causeway SE1 6BX
 258 Metro Central Heights 119 Newington Causeway SE1 6BX
 256 Metro Central Heights 119 Newington Causeway SE1 6BX
 254 Metro Central Heights 119 Newington Causeway SE1 6BX
 255 Metro Central Heights 119 Newington Causeway SE1 6BX
 259 Metro Central Heights 119 Newington Causeway SE1 6BX
 263 Metro Central Heights 119 Newington Causeway SE1 6BX
 264 Metro Central Heights 119 Newington Causeway SE1 6BX
 262 Metro Central Heights 119 Newington Causeway SE1 6BX
 260 Metro Central Heights 119 Newington Causeway SE1 6BX
 261 Metro Central Heights 119 Newington Causeway SE1 6BX
 226 Metro Central Heights 119 Newington Causeway SE1 6BW
 192 Metro Central Heights 119 Newington Causeway SE1 6BW
 194 Metro Central Heights 119 Newington Causeway SE1 6BW
 191 Metro Central Heights 119 Newington Causeway SE1 6BW
 189 Metro Central Heights 119 Newington Causeway SE1 6BW
 190 Metro Central Heights 119 Newington Causeway SE1 6BW
 195 Metro Central Heights 119 Newington Causeway SE1 6BW
 199 Metro Central Heights 119 Newington Causeway SE1 6BW
 201 Metro Central Heights 119 Newington Causeway SE1 6BW
 198 Metro Central Heights 119 Newington Causeway SE1 6BW
 196 Metro Central Heights 119 Newington Causeway SE1 6BW
 197 Metro Central Heights 119 Newington Causeway SE1 6BW
 188 Metro Central Heights 119 Newington Causeway SE1 6BT
 179 Metro Central Heights 119 Newington Causeway SE1 6BT
 180 Metro Central Heights 119 Newington Causeway SE1 6BT
 177 Metro Central Heights 119 Newington Causeway SE1 6BT
 175 Metro Central Heights 119 Newington Causeway SE1 6BT
 176 Metro Central Heights 119 Newington Causeway SE1 6BT
 181 Metro Central Heights 119 Newington Causeway SE1 6BT
 185 Metro Central Heights 119 Newington Causeway SE1 6BT
 187 Metro Central Heights 119 Newington Causeway SE1 6BT
 184 Metro Central Heights 119 Newington Causeway SE1 6BT
 182 Metro Central Heights 119 Newington Causeway SE1 6BT
 183 Metro Central Heights 119 Newington Causeway SE1 6BT
 217 Metro Central Heights 119 Newington Causeway SE1 6BW
 218 Metro Central Heights 119 Newington Causeway SE1 6BW
 216 Metro Central Heights 119 Newington Causeway SE1 6BW
 214 Metro Central Heights 119 Newington Causeway SE1 6BW
 215 Metro Central Heights 119 Newington Causeway SE1 6BW
 219 Metro Central Heights 119 Newington Causeway SE1 6BW
 223 Metro Central Heights 119 Newington Causeway SE1 6BW
 225 Metro Central Heights 119 Newington Causeway SE1 6BW
 222 Metro Central Heights 119 Newington Causeway SE1 6BW
 220 Metro Central Heights 119 Newington Causeway SE1 6BW
 221 Metro Central Heights 119 Newington Causeway SE1 6BW
 213 Metro Central Heights 119 Newington Causeway SE1 6BW
 205 Metro Central Heights 119 Newington Causeway SE1 6BW
 206 Metro Central Heights 119 Newington Causeway SE1 6BW
 204 Metro Central Heights 119 Newington Causeway SE1 6BW
 202 Metro Central Heights 119 Newington Causeway SE1 6BW
 203 Metro Central Heights 119 Newington Causeway SE1 6BW
 207 Metro Central Heights 119 Newington Causeway SE1 6BW
 211 Metro Central Heights 119 Newington Causeway SE1 6BW

Flat 2 183 Brook Drive SE11 4TG
Flat 3 183 Brook Drive SE11 4TG
Flat 10 Wardroper House SE1 6ET
Flat 11 Wardroper House SE1 6ET
Flat 8 Wardroper House SE1 6ET
Flat 9 Wardroper House SE1 6ET
Flat 14 Wardroper House SE1 6ET
Flat 15 Wardroper House SE1 6ET
Flat 12 Wardroper House SE1 6ET
Flat 13 Wardroper House SE1 6ET
21 Gaywood Street London SE1 6HG
Flat 3 Prospect House Gaywood Estate SE1 6HF
Flat 30 Prospect House Gaywood Estate SE1 6HF
Flat 28 Prospect House Gaywood Estate SE1 6HF
Flat 29 Prospect House Gaywood Estate SE1 6HF
Flat 33 Prospect House Gaywood Estate SE1 6HF
Flat 34 Prospect House Gaywood Estate SE1 6HF
Flat 31 Prospect House Gaywood Estate SE1 6HF
Flat 32 Prospect House Gaywood Estate SE1 6HF
Flat 22 Prospect House Gaywood Estate SE1 6HF
Flat 23 Prospect House Gaywood Estate SE1 6HF
Flat 20 Prospect House Gaywood Estate SE1 6HF
Flat 21 Prospect House Gaywood Estate SE1 6HF
Flat 26 Prospect House Gaywood Estate SE1 6HF
Flat 27 Prospect House Gaywood Estate SE1 6HF
Flat 24 Prospect House Gaywood Estate SE1 6HF
Flat 25 Prospect House Gaywood Estate SE1 6HF
Flat 35 Prospect House Gaywood Estate SE1 6HF
Flat 45 Prospect House Gaywood Estate SE1 6HF
Flat 46 Prospect House Gaywood Estate SE1 6HF
Flat 43 Prospect House Gaywood Estate SE1 6HF
Flat 44 Prospect House Gaywood Estate SE1 6HF
Flat 49 Prospect House Gaywood Estate SE1 6HF
Flat 5 Prospect House Gaywood Estate SE1 6HF
Flat 47 Prospect House Gaywood Estate SE1 6HF
Flat 48 Prospect House Gaywood Estate SE1 6HF
Flat 38 Prospect House Gaywood Estate SE1 6HF
Flat 39 Prospect House Gaywood Estate SE1 6HF
Flat 36 Prospect House Gaywood Estate SE1 6HF
Flat 37 Prospect House Gaywood Estate SE1 6HF
Flat 41 Prospect House Gaywood Estate SE1 6HF
Flat 42 Prospect House Gaywood Estate SE1 6HF
Flat 4 Prospect House Gaywood Estate SE1 6HF
Flat 40 Prospect House Gaywood Estate SE1 6HF
22 Princess Street London SE1 6HJ
24 Princess Street London SE1 6HJ
20 Princess Street London SE1 6HJ
30 Princess Street London SE1 6HJ
32 Princess Street London SE1 6HJ
26 Princess Street London SE1 6HJ
28 Princess Street London SE1 6HJ
27 Gaywood Street London SE1 6HG
23 Gaywood Street London SE1 6HG
24 Gaywood Street London SE1 6HG
33 Gaywood Street London SE1 6HG
35 Gaywood Street London SE1 6HG
29 Gaywood Street London SE1 6HG
31 Gaywood Street London SE1 6HG
34 Princess Street London SE1 6HJ
Flat 15 Prospect House Gaywood Estate SE1 6HF
Flat 16 Prospect House Gaywood Estate SE1 6HF
Flat 13 Prospect House Gaywood Estate SE1 6HF
Flat 14 Prospect House Gaywood Estate SE1 6HF
Flat 19 Prospect House Gaywood Estate SE1 6HF
Flat 2 Prospect House Gaywood Estate SE1 6HF
Flat 17 Prospect House Gaywood Estate SE1 6HF
Flat 18 Prospect House Gaywood Estate SE1 6HF
40 Princess Street London SE1 6HJ
42 Princess Street London SE1 6HJ
36 Princess Street London SE1 6HJ
38 Princess Street London SE1 6HJ
Flat 11 Prospect House Gaywood Estate SE1 6HF
Flat 12 Prospect House Gaywood Estate SE1 6HF
Flat 1 Prospect House Gaywood Estate SE1 6HF

[illegible]

Flat 10 Prospect House Gaywood Estate SE1 6HF
 32b Elliotts Row London SE11 4SZ
 First Floor And Second Floor Flat 22 West Square SE11 4SN
 Flat B 13 Hayles Street SE11 4SU
 Flat C 13 Hayles Street SE11 4SU
 Ground Floor Flat 177 Brook Drive SE11 4TG
 Flat A 13 Hayles Street SE11 4SU
 Flat A Ground Floor 19 Oswin Street SE11 4TF
 First Floor And Second Floor Flat 191 Brook Drive SE11 4TG
 Flat B First Floor 19 Oswin Street SE11 4TF
 Flat C Top Floor 19 Oswin Street SE11 4TF
 34 Hayles Street London SE11 4SS
 10 Keyworth Street London SE1 6NG
 Flat 1 43 Oswin Street SE11 4TF
 Flat 10 43 Oswin Street SE11 4TF
 Adjacent 74 London Road London Road SE1 6LW
 Second Floor And Third Floor Flat 17 Oswin Street SE11 4TF
 Flat 4 43 Oswin Street SE11 4TF
 Flat 5 43 Oswin Street SE11 4TF
 Flat 2 43 Oswin Street SE11 4TF
 Flat 3 43 Oswin Street SE11 4TF
 Second Floor And Third Floor Flat 1 Austral Street SE11 4SJ
 Ground Floor Flat 1 Austral Street SE11 4SJ
 First Floor Flat 1 Austral Street SE11 4SJ
 The Flat Metropolitan Tabernacle SE1 6SB
 London College Of Printing And Graphic Art Elephant And Castle SE1 6SB
 Flat 6 43 Oswin Street SE11 4TF
 Basement And Ground Floor Flat 22 West Square SE11 4SN
 Elephant Kiosk Outside Underground Station Elephant And Castle SE1 6LW
 Metropolitan Tabernacle Church Elephant And Castle SE1 6SD
 7b Hayles Street London SE11 4SU
 Imperial War Museum Annex Austral Street SE11 4SJ
 Flat 9 43 Oswin Street SE11 4TF
 Second Floor Left 21 St Georges Road SE1 6ES
 Flat 7 43 Oswin Street SE11 4TF
 Flat 8 43 Oswin Street SE11 4TF
 Third Floor Flat 30 West Square SE11 4SP
 Second Floor Right 21 St Georges Road SE1 6ES
 Ground Floor Flat 30 West Square SE11 4SP
 Unit 5b 10 Keyworth Street SE1 6NG
 Unit 5c 10 Keyworth Street SE1 6NG
 Unit 4f 10 Keyworth Street SE1 6NG
 Unit 5a 10 Keyworth Street SE1 6NG
 Unit 5f 10 Keyworth Street SE1 6NG
 Unit 6a 10 Keyworth Street SE1 6NG
 Unit 5d 10 Keyworth Street SE1 6NG
 Unit 5e 10 Keyworth Street SE1 6NG
 Unit 3f 10 Keyworth Street SE1 6NG
 Unit 4a 10 Keyworth Street SE1 6NG
 Unit 3d 10 Keyworth Street SE1 6NG
 Unit 3e 10 Keyworth Street SE1 6NG
 Unit 4d 10 Keyworth Street SE1 6NG
 Unit 4e 10 Keyworth Street SE1 6NG
 Unit 4b 10 Keyworth Street SE1 6NG
 Unit 4c 10 Keyworth Street SE1 6NG
 Unit 6b 10 Keyworth Street SE1 6NG
 Flat B 23 Oswin Street SE11 4TF
 Flat C 23 Oswin Street SE11 4TF
 Flat 3 54 Elliotts Row SE11 4SZ
 Flat A 23 Oswin Street SE11 4TF
 51a St Georges Road London SE1 6ER
 Flat 1 49 Elliotts Row SE11 4SZ
 Flat D 23 Oswin Street SE11 4TF
 Flat E 23 Oswin Street SE11 4TF
 Unit 6e 10 Keyworth Street SE1 6NG
 Unit 6f 10 Keyworth Street SE1 6NG
 Unit 6c 10 Keyworth Street SE1 6NG
 Unit 6d 10 Keyworth Street SE1 6NG
 Flat 1 54 Elliotts Row SE11 4SZ
 Flat 2 54 Elliotts Row SE11 4SZ
 320 Metro Central Heights 119 Newington Causeway SE1 6DB
 321 Metro Central Heights 119 Newington Causeway SE1 6DB
 319 Metro Central Heights 119 Newington Causeway SE1 6DB
 317 Metro Central Heights 119 Newington Causeway SE1 6DB
 318 Metro Central Heights 119 Newington Causeway SE1 6DB
 322 Metro Central Heights 119 Newington Causeway SE1 6DB
 326 Metro Central Heights 119 Newington Causeway SE1 6DB
 327 Metro Central Heights 119 Newington Causeway SE1 6DQ
 325 Metro Central Heights 119 Newington Causeway SE1 6DB
 323 Metro Central Heights 119 Newington Causeway SE1 6DB
 324 Metro Central Heights 119 Newington Causeway SE1 6DB
 316 Metro Central Heights 119 Newington Causeway SE1 6DB
 308 Metro Central Heights 119 Newington Causeway SE1 6DB
 309 Metro Central Heights 119 Newington Causeway SE1 6DB
 307 Metro Central Heights 119 Newington Causeway SE1 6DB
 304 Metro Central Heights 119 Newington Causeway SE1 6DB
 305 Metro Central Heights 119 Newington Causeway SE1 6DB
 310 Metro Central Heights 119 Newington Causeway SE1 6DB
 314 Metro Central Heights 119 Newington Causeway SE1 6DB
 315 Metro Central Heights 119 Newington Causeway SE1 6DB
 313 Metro Central Heights 119 Newington Causeway SE1 6DB
 311 Metro Central Heights 119 Newington Causeway SE1 6DB
 312 Metro Central Heights 119 Newington Causeway SE1 6DB
 333 334 Part 335 And Store H Shopping Centre SE1 6TB
 Palatial Leisure Ltd Shopping Centre SE1 6TE
 253 Shopping Centre Elephant And Castle SE1 6TE
 Flat 17 Tavern Court SE1 6RY
 Part First Floor Superbowl Shopping Centre SE1 6TE
 Ninth Floor Hannibal House SE1 6TE
 Tenth Floor Hannibal House SE1 6TE
 Fifth Floor Hannibal House SE1 6TE
 200-201 Shopping Centre Elephant And Castle SE1 6TE
 The Moat Shopping Centre SE1 6TE
 Flat 16 Tavern Court SE1 6RY
 Flat 8 Tavern Court SE1 6RY
 Flat 9 Tavern Court SE1 6RY
 Flat 7 Tavern Court SE1 6RY
 Flat 5 Tavern Court SE1 6RY
 Flat 6 Tavern Court SE1 6RY
 Flat 10 Tavern Court SE1 6RY
 Flat 14 Tavern Court SE1 6RY
 Flat 15 Tavern Court SE1 6RY
 Flat 13 Tavern Court SE1 6RY
 Flat 11 Tavern Court SE1 6RY
 Flat 12 Tavern Court SE1 6RY
 Flat 5 Wellesley Court SE1 6PD
 Flat 6 Wellesley Court SE1 6PD
 Flat 4 Wellesley Court SE1 6PD
 Flat 2 Wellesley Court SE1 6PD
 Flat 3 Wellesley Court SE1 6PD
 Flat 7 Wellesley Court SE1 6PD
 Flat 3 West Combe Apartments SE1 6BN
 Flat 5 West Combe Apartments SE1 6BN
 Flat 10 Wellesley Court SE1 6PD
 Flat 8 Wellesley Court SE1 6PD
 Flat 9 Wellesley Court SE1 6PD
 Flat 1 Wellesley Court SE1 6PD
 Sixth Floor Hannibal House SE1 6TE
 Second Floor Hannibal House SE1 6TE
 Seventh Floor Hannibal House SE1 6TE
 Eleventh Floor Hannibal House SE1 6TE
 Twelfth Floor Hannibal House SE1 6TE
 Third Floor Hannibal House SE1 6TE
 Flat 4 West Combe Apartments SE1 6BN
 Flat 9 West Combe Apartments SE1 6BN
 Fourth Floor Hannibal House SE1 6TE
 Community Action Southwark Eighth Floor Hannibal House SE1 6TE
 Flat 4 Tavern Court SE1 6RY
 462 Metro Central Heights 119 Newington Causeway SE1 6DT
 463 Metro Central Heights 119 Newington Causeway SE1 6DT

First Floor Flat 177 Brook Drive SE11 4TG
 Second Floor Flat 177 Brook Drive SE11 4TG
 Flat 2 187 Brook Drive SE11 4TG
 Flat 3 187 Brook Drive SE11 4TG
 55b St Georges Road London SE1 6ER
 Flat 1 187 Brook Drive SE11 4TG
 Flat B 117 Brook Drive SE11 4TU
 Flat 4 187 Brook Drive SE11 4TG
 Flat A 117 Brook Drive SE11 4TU
 35b Elliotts Row London SE11 4SZ
 85 St Georges Road SE1 6ER
 35a Elliotts Row London SE11 4SZ
 Flat B 46 Elliotts Row SE11 4SZ
 Flat A 46 Elliotts Row SE11 4SZ
 Ground Floor Flat 191 Brook Drive SE11 4TG
 Flat 1 15 Hayles Street SE11 4SU
 Unit 2d 10 Keyworth Street SE1 6NG
 Unit 2e 10 Keyworth Street SE1 6NG
 Unit 2b 10 Keyworth Street SE1 6NG
 Unit 2c 10 Keyworth Street SE1 6NG
 Unit 3b 10 Keyworth Street SE1 6NG
 Unit 3c 10 Keyworth Street SE1 6NG
 Unit 2f 10 Keyworth Street SE1 6NG
 Unit 3a 10 Keyworth Street SE1 6NG
 Unit 1a 10 Keyworth Street SE1 6NG
 Unit 1b 10 Keyworth Street SE1 6NG
 Flat 2 15 Hayles Street SE11 4SU
 Flat 3 15 Hayles Street SE11 4SU
 Unit 1e 10 Keyworth Street SE1 6NG
 Unit 2a 10 Keyworth Street SE1 6NG
 Unit 1c 10 Keyworth Street SE1 6NG
 Unit 1d 10 Keyworth Street SE1 6NG
 Flat 50 Prospect House Gaywood Estate SE1 6HF
 4 St Georges Buildings St Georges Road SE1 6EP
 5 St Georges Buildings St Georges Road SE1 6EP
 3 St Georges Buildings St Georges Road SE1 6EP
 34 St Georges Buildings St Georges Road SE1 6EP
 8 St Georges Buildings St Georges Road SE1 6EP
 9 St Georges Buildings St Georges Road SE1 6EP
 6 St Georges Buildings St Georges Road SE1 6EP
 7 St Georges Buildings St Georges Road SE1 6EP
 10 St Georges Buildings St Georges Road SE1 6EP
 11 St Georges Buildings St Georges Road SE1 6EP
 83 St Georges Road London SE1 6ER
 1 St Georges Buildings St Georges Road SE1 6EP
 22 St Georges Buildings St Georges Road SE1 6EP
 28 St Georges Buildings St Georges Road SE1 6EP
 12 St Georges Buildings St Georges Road SE1 6EP
 2 St Georges Buildings St Georges Road SE1 6EP
 Flat 83 Perronet House Gaywood Estate SE1 6JS
 Flat 22 Newman House Gaywood Estate SE1 6HE
 Flat 23 Newman House Gaywood Estate SE1 6HE
 Flat 20 Newman House Gaywood Estate SE1 6HE
 Flat 21 Newman House Gaywood Estate SE1 6HE
 Flat 26 Newman House Gaywood Estate SE1 6HE
 Flat 27 Newman House Gaywood Estate SE1 6HE
 Flat 24 Newman House Gaywood Estate SE1 6HE
 Flat 25 Newman House Gaywood Estate SE1 6HE
 Flat 86 Perronet House Gaywood Estate SE1 6JS
 Flat 87 Perronet House Gaywood Estate SE1 6JS
 Flat 84 Perronet House Gaywood Estate SE1 6JS
 Flat 85 Perronet House Gaywood Estate SE1 6JS
 Flat 90 Perronet House Gaywood Estate SE1 6JS
 Flat 19 Newman House Gaywood Estate SE1 6HE
 Flat 88 Perronet House Gaywood Estate SE1 6JS
 Flat 89 Perronet House Gaywood Estate SE1 6JS
 Flat 82 Perronet House Gaywood Estate SE1 6JS
 Flat 80 Perronet House Gaywood Estate SE1 6JS
 Flat 81 Perronet House Gaywood Estate SE1 6JS
 Flat B 58 St Georges Road SE1 6ET
 Flat B 60 St Georges Road SE1 6ET
 Flat A 58 St Georges Road SE1 6ET
 Flat A 60 St Georges Road SE1 6ET
 Flat 74 Perronet House Gaywood Estate SE1 6JS
 461 Metro Central Heights 119 Newington Causeway SE1 6DT
 459 Metro Central Heights 119 Newington Causeway SE1 6DT
 460 Metro Central Heights 119 Newington Causeway SE1 6DT
 464 Metro Central Heights 119 Newington Causeway SE1 6DT
 468 Metro Central Heights 119 Newington Causeway SE1 6DT
 469 Metro Central Heights 119 Newington Causeway SE1 6DT
 467 Metro Central Heights 119 Newington Causeway SE1 6DT
 465 Metro Central Heights 119 Newington Causeway SE1 6DT
 466 Metro Central Heights 119 Newington Causeway SE1 6DT
 458 Metro Central Heights 119 Newington Causeway SE1 6DT
 450 Metro Central Heights 119 Newington Causeway SE1 6DT
 451 Metro Central Heights 119 Newington Causeway SE1 6DT
 449 Metro Central Heights 119 Newington Causeway SE1 6DT
 447 Metro Central Heights 119 Newington Causeway SE1 6DT
 448 Metro Central Heights 119 Newington Causeway SE1 6DT
 452 Metro Central Heights 119 Newington Causeway SE1 6DT
 456 Metro Central Heights 119 Newington Causeway SE1 6DT
 457 Metro Central Heights 119 Newington Causeway SE1 6DT
 455 Metro Central Heights 119 Newington Causeway SE1 6DT
 453 Metro Central Heights 119 Newington Causeway SE1 6DT
 454 Metro Central Heights 119 Newington Causeway SE1 6DT
 Arches 104 To 105 New Kent Road SE1 6DT
 Flat 2 Tavern Court SE1 6RY
 Flat 3 Tavern Court SE1 6RY
 Flat 1 Tavern Court SE1 6RY
 Wetherspoons Metro Central Heights SE1 6DQ
 481 Metro Central Heights 119 Newington Causeway SE1 6DT
 473 Metro Central Heights 119 Newington Causeway SE1 6DT
 474 Metro Central Heights 119 Newington Causeway SE1 6DT
 472 Metro Central Heights 119 Newington Causeway SE1 6DT
 470 Metro Central Heights 119 Newington Causeway SE1 6DT
 471 Metro Central Heights 119 Newington Causeway SE1 6DT
 475 Metro Central Heights 119 Newington Causeway SE1 6DT
 479 Metro Central Heights 119 Newington Causeway SE1 6DT
 480 Metro Central Heights 119 Newington Causeway SE1 6DT
 478 Metro Central Heights 119 Newington Causeway SE1 6DT
 476 Metro Central Heights 119 Newington Causeway SE1 6DT
 477 Metro Central Heights 119 Newington Causeway SE1 6DT
 Flat 14 28 Arch Street SE1 6AS
 Flat 15 28 Arch Street SE1 6AS
 Flat 13 28 Arch Street SE1 6AS
 Flat 11 28 Arch Street SE1 6AS
 Flat 12 28 Arch Street SE1 6AS
 Flat 16 28 Arch Street SE1 6AS
 Unit B 28 Arch Street SE1 6AS
 Unit 1 28 Arch Street SE1 6AS
 Flat 17 28 Arch Street SE1 6AS
 Flat 18 28 Arch Street SE1 6AS
 Flat 10 28 Arch Street SE1 6AS
 Flat 2 28 Arch Street SE1 6AS
 Flat 3 28 Arch Street SE1 6AS
 Flat 1 28 Arch Street SE1 6AS
 Flat 33 26 Arch Street SE1 6AT
 Unit A 26 Arch Street SE1 6AT
 Flat 4 28 Arch Street SE1 6AS
 Flat 8 28 Arch Street SE1 6AS
 Flat 9 28 Arch Street SE1 6AS
 Flat 7 28 Arch Street SE1 6AS
 Flat 5 28 Arch Street SE1 6AS
 Flat 6 28 Arch Street SE1 6AS
 Railway Arch 4 Elephant Mews SE17 1LB
 Railway Arch 5 Elephant Mews SE17 1LB
 Basement Flat Brotherhood Of The Cross And Star SE1 6RT
 Living Accommodation The Charlie Chaplin SE1 6TJ
 Railway Arch 6 Elephant Mews SE17 1LB
 Rockingham Community Day Nursery Falmouth Road SE1 6QP
 Room 6 81 New Kent Road SE1 6RD
 Room 7 81 New Kent Road SE1 6RD
 Room 5 81 New Kent Road SE1 6RD
 Room 2 81 New Kent Road SE1 6RD
 Room 3 81 New Kent Road SE1 6RD
 Room 8 81 New Kent Road SE1 6RD
 Room 9 81 New Kent Road SE1 6RD
 Flat 32 26 Arch Street SE1 6AT

Flat 75 Perronet House Gaywood Estate SE1 6JS
 Flat 72 Perronet House Gaywood Estate SE1 6JS
 Flat 73 Perronet House Gaywood Estate SE1 6JS
 Flat 78 Perronet House Gaywood Estate SE1 6JS
 Flat 79 Perronet House Gaywood Estate SE1 6JS
 Flat 76 Perronet House Gaywood Estate SE1 6JS
 Flat 77 Perronet House Gaywood Estate SE1 6JS
 Flat C 58 St Georges Road SE1 6ET
 71 St Georges Road London SE1 6ER
 73 St Georges Road London SE1 6ER
 67 St Georges Road London SE1 6ER
 69 St Georges Road London SE1 6ER
 79 St Georges Road London SE1 6ER
 81 St Georges Road London SE1 6ER
 75 St Georges Road London SE1 6ER
 77 St Georges Road London SE1 6ER
 Flat D 60 St Georges Road SE1 6ET
 Prince Of Wales 51 St Georges Road SE1 6ER
 Flat C 60 St Georges Road SE1 6ET
 Flat D 58 St Georges Road SE1 6ET
 63 St Georges Road London SE1 6ER
 65 St Georges Road London SE1 6ER
 55-57 St Georges Road London SE1 6ER
 59 St Georges Road London SE1 6ER
 Flat 28 Newman House Gaywood Estate SE1 6HE
 43 London Road London SE1 6JW
 Flat 1 44 London Road SE1 6JW
 41 London Road London SE1 6JW
 42 London Road London SE1 6JW
 Flat 4 44 London Road SE1 6JW
 Flat 5 44 London Road SE1 6JW
 Flat 2 44 London Road SE1 6JW
 Flat 3 44 London Road SE1 6JW
 Flat 33 St Georges Road SE1 6EW
 Flat 56 Prospect House Gaywood Estate SE1 6HF
 55a St Georges Road London SE1 6ER
 39 London Road London SE1 6JW
 40 London Road London SE1 6JW
 37 London Road London SE1 6JW
 38 London Road London SE1 6JW
 Flat 6 44 London Road SE1 6JW
 25 Austral Street London SE11 4SJ
 27 Austral Street London SE11 4SJ
 23 Austral Street London SE11 4SJ
 6 Austral Street London SE11 4SJ
 7 Austral Street London SE11 4SJ
 3 Austral Street London SE11 4SJ
 4 Austral Street London SE11 4SJ
 Flat 7 44 London Road SE1 6JW
 Flat 8 44 London Road SE1 6JW
 19 Austral Street London SE11 4SJ
 2 Austral Street London SE11 4SJ
 17 Austral Street London SE11 4SJ
 Flat 60 Newman House Gaywood Estate SE1 6HE
 Flat 61 Newman House Gaywood Estate SE1 6HE
 Flat 58 Newman House Gaywood Estate SE1 6HE
 Flat 59 Newman House Gaywood Estate SE1 6HE
 13 St Georges Buildings St Georges Road SE1 6EP
 14 St Georges Buildings St Georges Road SE1 6EP
 Flat 62 Newman House Gaywood Estate SE1 6HE
 250 Southwark Bridge Road London SE1 6NJ
 Flat 52 Newman House Gaywood Estate SE1 6HE
 Flat 53 Newman House Gaywood Estate SE1 6HE
 Flat 29 Newman House Gaywood Estate SE1 6HE
 Flat 51 Newman House Gaywood Estate SE1 6HE
 Flat 56 Newman House Gaywood Estate SE1 6HE
 Flat 57 Newman House Gaywood Estate SE1 6HE
 Flat 54 Newman House Gaywood Estate SE1 6HE
 Flat 55 Newman House Gaywood Estate SE1 6HE
 15 St Georges Buildings St Georges Road SE1 6EP
 27 St Georges Buildings St Georges Road SE1 6EP
 29 St Georges Buildings St Georges Road SE1 6EP
 25 St Georges Buildings St Georges Road SE1 6EP
 26 St Georges Buildings St Georges Road SE1 6EP
 Flat 1 26 Arch Street SE1 6AT
 Flat 2 26 Arch Street SE1 6AT
 Flat 3 26 Arch Street SE1 6AT
 Flat 7 26 Arch Street SE1 6AT
 Flat 8 26 Arch Street SE1 6AT
 Flat 6 26 Arch Street SE1 6AT
 Flat 4 26 Arch Street SE1 6AT
 Flat 5 26 Arch Street SE1 6AT
 Unit 4 And Unit 5 Farrell Court SE17 1LB
 Railway Arch 110 Elephant Road SE17 1LB
 Flat 8 West Combe Apartments SE1 6BN
 Flat 6 West Combe Apartments SE1 6BN
 Flat 7 West Combe Apartments SE1 6BN
 Unit 1 5-9 Rockingham Street SE1 6PD
 Unit 2 5-9 Rockingham Street SE1 6PD
 Flat 24 26 Arch Street SE1 6AT
 Flat 25 26 Arch Street SE1 6AT
 Flat 23 26 Arch Street SE1 6AT
 Flat 21 26 Arch Street SE1 6AT
 Flat 22 26 Arch Street SE1 6AT
 Flat 26 26 Arch Street SE1 6AT
 Flat 30 26 Arch Street SE1 6AT
 Flat 31 26 Arch Street SE1 6AT
 Flat 29 26 Arch Street SE1 6AT
 Flat 27 26 Arch Street SE1 6AT
 Flat 28 26 Arch Street SE1 6AT
 Flat 20 26 Arch Street SE1 6AT
 Flat 12 26 Arch Street SE1 6AT
 Flat 13 26 Arch Street SE1 6AT
 Flat 11 26 Arch Street SE1 6AT
 Flat 9 26 Arch Street SE1 6AT
 Flat 10 26 Arch Street SE1 6AT
 Flat 14 26 Arch Street SE1 6AT
 Flat 18 26 Arch Street SE1 6AT
 Flat 19 26 Arch Street SE1 6AT
 Flat 17 26 Arch Street SE1 6AT
 Flat 15 26 Arch Street SE1 6AT
 Flat 16 26 Arch Street SE1 6AT
 446 Metro Central Heights 119 Newington Causeway SE1 6DT
 241 Shopping Centre Elephant And Castle SE1 6TE
 242-245 Shopping Centre Elephant And Castle SE1 6TE
 240 Shopping Centre Elephant And Castle SE1 6TE
 Rear 238 Shopping Centre SE1 6TE
 239 Shopping Centre Elephant And Castle SE1 6TE
 254-255 Shopping Centre Elephant And Castle SE1 6TE
 306 Shopping Centre Elephant And Castle SE1 6TB
 307 Shopping Centre Elephant And Castle SE1 6TB
 305 Shopping Centre Elephant And Castle SE1 6TB
 256-257 Shopping Centre Elephant And Castle SE1 6TE
 300-304 Shopping Centre Elephant And Castle SE1 6TB
 Front 238 Shopping Centre SE1 6TE
 218 Shopping Centre Elephant And Castle SE1 6TE
 219 Shopping Centre Elephant And Castle SE1 6TE
 214 Shopping Centre Elephant And Castle SE1 6TE
 212 Shopping Centre Elephant And Castle SE1 6TE
 213 Shopping Centre Elephant And Castle SE1 6TE
 220-221 Shopping Centre Elephant And Castle SE1 6TE
 235 Shopping Centre Elephant And Castle SE1 6TB
 236 Shopping Centre Elephant And Castle SE1 6TE
 234 Shopping Centre Elephant And Castle SE1 6TE
 222-223 Shopping Centre Elephant And Castle SE1 6TE
 232-233 Shopping Centre Elephant And Castle SE1 6TE
 329 Shopping Centre Elephant And Castle SE1 6TB
 330 Shopping Centre Elephant And Castle SE1 6TB
 325 Shopping Centre Elephant And Castle SE1 6TB
 320-322 Shopping Centre Elephant And Castle SE1 6TB
 323-324 Shopping Centre Elephant And Castle SE1 6TB
 331-332 Shopping Centre Elephant And Castle SE1 6TB
 340 Shopping Centre Elephant And Castle SE1 6TB
 340a Shopping Centre Elephant And Castle SE1 6TB
 339 Shopping Centre Elephant And Castle SE1 6TB
 335-336 Shopping Centre Elephant And Castle SE1 6TB
 338-339 Shopping Centre Elephant And Castle SE1 6TB
 319 Shopping Centre Elephant And Castle SE1 6TB

32 St Georges Buildings St Georges Road SE1 6EP
 33 St Georges Buildings St Georges Road SE1 6EP
 30 St Georges Buildings St Georges Road SE1 6EP
 31 St Georges Buildings St Georges Road SE1 6EP
 18 St Georges Buildings St Georges Road SE1 6EP
 19 St Georges Buildings St Georges Road SE1 6EP
 16 St Georges Buildings St Georges Road SE1 6EP
 17 St Georges Buildings St Georges Road SE1 6EP
 23 St Georges Buildings St Georges Road SE1 6EP
 24 St Georges Buildings St Georges Road SE1 6EP
 20 St Georges Buildings St Georges Road SE1 6EP
 21 St Georges Buildings St Georges Road SE1 6EP
 Flat B 7 Princess Street SE1 6HH
 Flat B 9 Princess Street SE1 6HH
 Flat B 17 Princess Street SE1 6HH
 Flat B 19 Princess Street SE1 6HH
 Flat 11 Laurie House Gaywood Estate SE1 6HQ
 Flat 12 Laurie House Gaywood Estate SE1 6HQ
 Flat 1 Laurie House Gaywood Estate SE1 6HQ
 Flat 10 Laurie House Gaywood Estate SE1 6HQ
 Flat A 19 Princess Street SE1 6HH
 Flat A 7 Princess Street SE1 6HH
 Flat A 15 Princess Street SE1 6HH
 Flat A 17 Princess Street SE1 6HH
 Flat B 13 Princess Street SE1 6HH
 Flat B 15 Princess Street SE1 6HH

Flat A 9 Princess Street SE1 6HH
 Flat B 11 Princess Street SE1 6HH
 Flat 13 Laurie House Gaywood Estate SE1 6HQ
 Flat 8 Laurie House Gaywood Estate SE1 6HQ
 Flat 9 Laurie House Gaywood Estate SE1 6HQ
 Flat 6 Laurie House Gaywood Estate SE1 6HQ
 Flat 7 Laurie House Gaywood Estate SE1 6HQ
 Flat 11 Perronet House Gaywood Estate SE1 6JR
 Flat 12 Perronet House Gaywood Estate SE1 6JR
 Flat 1 Perronet House Gaywood Estate SE1 6JR
 Flat 10 Perronet House Gaywood Estate SE1 6JR
 Flat 16 Laurie House Gaywood Estate SE1 6HQ
 Flat 17 Laurie House Gaywood Estate SE1 6HQ
 Flat 14 Laurie House Gaywood Estate SE1 6HQ
 Flat 15 Laurie House Gaywood Estate SE1 6HQ
 Flat 4 Laurie House Gaywood Estate SE1 6HQ
 Flat 5 Laurie House Gaywood Estate SE1 6HQ
 Flat 2 Laurie House Gaywood Estate SE1 6HQ
 Flat 3 Laurie House Gaywood Estate SE1 6HQ
 Flat 61 Prospect House Gaywood Estate SE1 6HF
 Flat 62 Prospect House Gaywood Estate SE1 6HF
 Flat 6 Prospect House Gaywood Estate SE1 6HF
 Flat 60 Prospect House Gaywood Estate SE1 6HF
 Flat 8 Prospect House Gaywood Estate SE1 6HF
 Flat 9 Prospect House Gaywood Estate SE1 6HF
 Flat 63 Prospect House Gaywood Estate SE1 6HF
 Flat 7 Prospect House Gaywood Estate SE1 6HF
 Flat 53 Prospect House Gaywood Estate SE1 6HF
 Flat 54 Prospect House Gaywood Estate SE1 6HF
 Flat 51 Prospect House Gaywood Estate SE1 6HF
 Flat 52 Prospect House Gaywood Estate SE1 6HF
 Flat 58 Prospect House Gaywood Estate SE1 6HF
 Flat 59 Prospect House Gaywood Estate SE1 6HF
 Flat 55 Prospect House Gaywood Estate SE1 6HF
 Flat 57 Prospect House Gaywood Estate SE1 6HF
 Flat B 18 Gaywood Street SE1 6HG
 Flat B 20 Gaywood Street SE1 6HG
 Flat B 14 Gaywood Street SE1 6HG
 Flat B 16 Gaywood Street SE1 6HG
 Flat A 11 Princess Street SE1 6HH
 Flat A 13 Princess Street SE1 6HH
 Flat B 22 Gaywood Street SE1 6HG
 Flat B 8 Gaywood Street SE1 6HG
 Flat A 16 Gaywood Street SE1 6HG
 Flat A 18 Gaywood Street SE1 6HG
 Flat A 12 Gaywood Street SE1 6HG
 Flat A 14 Gaywood Street SE1 6HG

310 Shopping Centre Elephant And Castle SE1 6TB
 311 Shopping Centre Elephant And Castle SE1 6TB
 309 Shopping Centre Elephant And Castle SE1 6TB
 308 Shopping Centre Elephant And Castle SE1 6TB
 Store 1 Rear Of 308 To 309 Shopping Centre SE1 6TE
 312 Shopping Centre Elephant And Castle SE1 6TB
 317 Shopping Centre Elephant And Castle SE1 6TB
 318 Shopping Centre Elephant And Castle SE1 6TB
 316 Shopping Centre Elephant And Castle SE1 6TB
 313 Shopping Centre Elephant And Castle SE1 6TB
 314-315 Shopping Centre Elephant And Castle SE1 6TB
 211 Shopping Centre Elephant And Castle SE1 6TE
 Unit 211 And 212 Shopping Centre SE1 6TE
 Unit 215 And 216 Shopping Centre SE1 6TE
 Unit 200 Shopping Centre SE1 6TE
 Store I Shopping Centre SE1 6TF
 Store T Shopping Centre SE1 6TB
 Unit 217 Shopping Centre SE1 6TE
 Unit 236 And 237 And 337 Shopping Centre SE1 6SZ
 Unit 238 Shopping Centre SE1 6TE
 Unit 234 And 235 Shopping Centre SE1 6TE
 Unit 220 To 223 Shopping Centre SE1 6TE
 Unit 231 Shopping Centre SE1 6TE
 Kiosk Shopping Centre SE1 6TB
 224 To 230 And 326 To 328 Shopping Centre SE1 6TE
 Elephant And Castle Underground Station Elephant And Castle SE1 6LW
 Part Basement Shopping Centre SE1 6TE
 Faraday Suite Part First Floor Shopping Centre SE1 6TE
 Glass Unit Coffee Point Shopping Centre SE1 6TE
 First Floor Shopping Centre SE1 6TE
 Centre Unit Shopping Centre SE1 6TE
 Workshops 1 And 6 Shopping Centre SE1 6TE
 203 Shopping Centre Elephant And Castle SE1 6TE
 Workshop 5 Shopping Centre SE1 6TE
 Workshop 3 Shopping Centre SE1 6TE
 Workshop 4 Shopping Centre SE1 6TE
 204 Shopping Centre Elephant And Castle SE1 6TE
 209 Shopping Centre Elephant And Castle SE1 6TE
 210 Shopping Centre Elephant And Castle SE1 6TE
 207-208 Shopping Centre Elephant And Castle SE1 6TE
 205 Shopping Centre Elephant And Castle SE1 6TE
 206 Shopping Centre Elephant And Castle SE1 6TE
 Workshop 2 Shopping Centre SE1 6TE
 Unit 320 Shopping Centre SE1 6TB
 Unit 321 Shopping Centre SE1 6TB
 Unit 306 And 308 Shopping Centre SE1 6TB
 Unit 250 Shopping Centre SE1 6TE
 Unit 252 Shopping Centre SE1 6TE
 Unit 322 Shopping Centre SE1 6TB
 Unit 344 Shopping Centre SE1 6TB
 Unit 352 Shopping Centre SE1 6TB
 Unit 340b Shopping Centre SE1 6TB
 Unit 333 Shopping Centre SE1 6TB
 Unit 338 Shopping Centre SE1 6TA
 415 Metro Central Heights 119 Newington Causeway SE1 6DT
 416 Metro Central Heights 119 Newington Causeway SE1 6DT
 414 Metro Central Heights 119 Newington Causeway SE1 6DT
 Flat 2 West Combe Apartments SE1 6BN
 417 Metro Central Heights 119 Newington Causeway SE1 6DT
 421 Metro Central Heights 119 Newington Causeway SE1 6DT
 422 Metro Central Heights 119 Newington Causeway SE1 6DT
 420 Metro Central Heights 119 Newington Causeway SE1 6DT
 418 Metro Central Heights 119 Newington Causeway SE1 6DT
 419 Metro Central Heights 119 Newington Causeway SE1 6DT
 Flat 1 West Combe Apartments SE1 6BN
 St Matthews At The Elephant Meadow Row SE1 6RG
 Unit 17 Shopping Centre SE1 6SZ
 237c And D238 Shopping Centre SE1 6TE
 Unit 350 Shopping Centre SE1 6TB
 104-124 Newington Butts London SE11 4QU
 337 Shopping Centre Elephant And Castle SE1 6TE
 438 Metro Central Heights 119 Newington Causeway SE1 6DT
 439 Metro Central Heights 119 Newington Causeway SE1 6DT

[illegible]

437 Metro Central Heights 119 Newington Causeway SE1 6DT
435 Metro Central Heights 119 Newington Causeway SE1 6DT
436 Metro Central Heights 119 Newington Causeway SE1 6DT
440 Metro Central Heights 119 Newington Causeway SE1 6DT
444 Metro Central Heights 119 Newington Causeway SE1 6DT
445 Metro Central Heights 119 Newington Causeway SE1 6DT
443 Metro Central Heights 119 Newington Causeway SE1 6DT
441 Metro Central Heights 119 Newington Causeway SE1 6DT
442 Metro Central Heights 119 Newington Causeway SE1 6DT
434 Metro Central Heights 119 Newington Causeway SE1 6DT
426 Metro Central Heights 119 Newington Causeway SE1 6DT
427 Metro Central Heights 119 Newington Causeway SE1 6DT
425 Metro Central Heights 119 Newington Causeway SE1 6DT
423 Metro Central Heights 119 Newington Causeway SE1 6DT
424 Metro Central Heights 119 Newington Causeway SE1 6DT
428 Metro Central Heights 119 Newington Causeway SE1 6DT
432 Metro Central Heights 119 Newington Causeway SE1 6DT
433 Metro Central Heights 119 Newington Causeway SE1 6DT
431 Metro Central Heights 119 Newington Causeway SE1 6DT
429 Metro Central Heights 119 Newington Causeway SE1 6DT
430 Metro Central Heights 119 Newington Causeway SE1 6DT
Room 4 81 New Kent Road SE1 6RD
15 Elephant And Castle London SE1 6TB
341-343 Shopping Centre Elephant And Castle SE1 6TB
353 Shopping Centre Elephant And Castle SE1 6TB
Unit 3 Metro Central Heights SE1 6BN
Unit 4 Metro Central Heights SE1 6BN
Store Lower Ground Floor Smeaton Court SE1 6PF
Railway Arch 1 Elephant Mews SE17 1LB
Railway Arch 3 Elephant Mews SE17 1LB
237b Shopping Centre Elephant And Castle SE1 6TE
237a Shopping Centre Elephant And Castle SE1 6TE
Railway Arch 2 Elephant Mews SE17 1LB
Unit 237 To 239 Shopping Centre SE1 6TE
Unit 234 To 235 Shopping Centre SE1 6TE
Unit 211 Shopping Centre SE1 6TE
Unit 340 Shopping Centre SE1 6TB
Flat 10 Binnie House Rockingham Estate SE1 6QG
Flat 11 Binnie House Rockingham Estate SE1 6QG
Flat 1 Binnie House Rockingham Estate SE1 6QG
Flat 8 Rankine House Rockingham Estate SE1 6PL
Flat 9 Rankine House Rockingham Estate SE1 6PL
Flat 12 Binnie House Rockingham Estate SE1 6QG
Flat 16 Binnie House Rockingham Estate SE1 6QG
Flat 17 Binnie House Rockingham Estate SE1 6QG
Flat 15 Binnie House Rockingham Estate SE1 6QG
Flat 13 Binnie House Rockingham Estate SE1 6QG
Flat 14 Binnie House Rockingham Estate SE1 6QG
Flat 7 Rankine House Rockingham Estate SE1 6PL
Flat 22 Rankine House Rockingham Estate SE1 6PL
Flat 23 Rankine House Rockingham Estate SE1 6PL
Flat 21 Rankine House Rockingham Estate SE1 6PL
Flat 2 Rankine House Rockingham Estate SE1 6PL
Flat 20 Rankine House Rockingham Estate SE1 6PL
Flat 24 Rankine House Rockingham Estate SE1 6PL
Flat 5 Rankine House Rockingham Estate SE1 6PL
Flat 6 Rankine House Rockingham Estate SE1 6PL
Flat 4 Rankine House Rockingham Estate SE1 6PL
Flat 25 Rankine House Rockingham Estate SE1 6PL
Flat 3 Rankine House Rockingham Estate SE1 6PL
Flat 14 Aird House Rockingham Estate SE1 6QH
Flat 15 Aird House Rockingham Estate SE1 6QH
Flat 13 Aird House Rockingham Estate SE1 6QH
Flat 11 Aird House Rockingham Estate SE1 6QH
Flat 12 Aird House Rockingham Estate SE1 6QH
Flat 16 Aird House Rockingham Estate SE1 6QH
Flat 2 Aird House Rockingham Estate SE1 6QH
Flat 20 Aird House Rockingham Estate SE1 6QH
Flat 19 Aird House Rockingham Estate SE1 6QH
Flat 17 Aird House Rockingham Estate SE1 6QH
Flat 18 Aird House Rockingham Estate SE1 6QH
Flat 10 Aird House Rockingham Estate SE1 6QH
Flat 3 Binnie House Rockingham Estate SE1 6QG
Flat 4 Binnie House Rockingham Estate SE1 6QG

Flat 6 1 Dante Road SE11 4RB
 3 Dante Road London SE11 4RB
 Flat 4 144 Brook Drive SE11 4TE
 142 Brook Drive London SE11 4TE
 Flat A 2 Dante Place SE11 4RX
 140 Brook Drive London SE11 4TE
 Flat 5 144 Brook Drive SE11 4TE
 Flat 6 144 Brook Drive SE11 4TE
 Flat 5 1 Dante Road SE11 4RB
 Flat 5 158 Brook Drive SE11 4TE
 Flat 6 158 Brook Drive SE11 4TE
 Flat 4 158 Brook Drive SE11 4TE
 Flat 2 158 Brook Drive SE11 4TE
 Flat 3 158 Brook Drive SE11 4TE
 2 Churchyard Row London SE11 4TW
 Flat 3 1 Dante Road SE11 4RB
 Flat 4 1 Dante Road SE11 4RB
 Flat 2 1 Dante Road SE11 4RB
 2 Dante Road London SE11 4RB
 Flat 1 1 Dante Road SE11 4RB
 Flat B 2 Dante Place SE11 4RX
 Flat G 4 Dante Place SE11 4RX
 Flat H 4 Dante Place SE11 4RX
 Flat F 4 Dante Place SE11 4RX
 Flat D 4 Dante Place SE11 4RX
 Flat E 4 Dante Place SE11 4RX
 Flat A 2 Holyoak Road SE11 4RD
 Flat E 2 Holyoak Road SE11 4RD
 Flat F 2 Holyoak Road SE11 4RD
 Flat D 2 Holyoak Road SE11 4RD
 Flat B 2 Holyoak Road SE11 4RD
 Flat C 2 Holyoak Road SE11 4RD
 Flat C 4 Dante Place SE11 4RX
 Flat F 2 Dante Place SE11 4RX
 Flat G 2 Dante Place SE11 4RX
 Flat E 2 Dante Place SE11 4RX
 Flat C 2 Dante Place SE11 4RX
 Flat D 2 Dante Place SE11 4RX
 Flat H 2 Dante Place SE11 4RX
 Flat A 4 Dante Place SE11 4RX
 Flat B 4 Dante Place SE11 4RX
 Flat K 2 Dante Place SE11 4RX
 Flat I 2 Dante Place SE11 4RX
 Flat J 2 Dante Place SE11 4RX
 Flat 1 158 Brook Drive SE11 4TE
 97 Newington Butts London SE1 6SF
 94-96 Walworth Road London SE1 6SW
 103 Newington Butts London SE1 6SF
 14 Walworth Road London SE1 6SY
 80-82 Walworth Road London SE1 6SW
 86 Newington Butts London SE11 4QU
 90 Walworth Road London SE1 6SW
 4 Walworth Road London SE1 6EB
 86 Walworth Road London SE1 6SW
 Castle Day Centre Hampton Street SE1 6SN
 Flat 55 Sherston Court SE1 6SG
 Flat 56 Sherston Court SE1 6SG
 Flat 5 Sherston Court SE1 6SG
 Flat 43 Sherston Court SE1 6SG
 Flat 44 Sherston Court SE1 6SG
 Flat 57 Sherston Court SE1 6SG
 Flat 8 Sherston Court SE1 6SG
 Flat 6 Sherston Court SE1 6SG
 Flat 7 Sherston Court SE1 6SG
 167 Brook Drive London SE11 4TG
 154 Brook Drive London SE11 4TE
 156 Brook Drive London SE11 4TE
 152 Brook Drive London SE11 4TE
 148 Brook Drive London SE11 4TE
 150 Brook Drive London SE11 4TE
 160 Brook Drive London SE11 4TE
 168 Brook Drive London SE11 4TE
 170 Brook Drive London SE11 4TE
 166 Brook Drive London SE11 4TE

Flat 2 Binnie House Rockingham Estate SE1 6QG
 Flat 18 Binnie House Rockingham Estate SE1 6QG
 Flat 19 Binnie House Rockingham Estate SE1 6QG
 Flat 5 Binnie House Rockingham Estate SE1 6QG
 Flat 9 Binnie House Rockingham Estate SE1 6QG
 Flat 1 Aird House Rockingham Estate SE1 6QH
 Flat 8 Binnie House Rockingham Estate SE1 6QG
 Flat 6 Binnie House Rockingham Estate SE1 6QG
 Flat 7 Binnie House Rockingham Estate SE1 6QG
 Flat 19 Rankine House Rockingham Estate SE1 6PL
 Flat 6 Varley House Rockingham Estate SE1 6AL
 Flat 7 Varley House Rockingham Estate SE1 6AL
 Flat 5 Varley House Rockingham Estate SE1 6AL
 Flat 3 Varley House Rockingham Estate SE1 6AL
 Flat 4 Varley House Rockingham Estate SE1 6AL
 Flat 8 Varley House Rockingham Estate SE1 6AL
 Flat 11 Cartwright House Rockingham Estate SE1 6AN
 Flat 12 Cartwright House Rockingham Estate SE1 6AN
 Flat 10 Cartwright House Rockingham Estate SE1 6AN
 Flat 9 Varley House Rockingham Estate SE1 6AL
 Flat 1 Cartwright House Rockingham Estate SE1 6AN
 Flat 2 Varley House Rockingham Estate SE1 6AL
 86 Rockingham Street London SE1 6PG
 88 Rockingham Street London SE1 6PG
 84 Rockingham Street London SE1 6PG
 80 Rockingham Street London SE1 6PG
 82 Rockingham Street London SE1 6PG
 90 Rockingham Street London SE1 6PG
 98 Rockingham Street London SE1 6PG
 Flat 1 Varley House Rockingham Estate SE1 6AL
 96 Rockingham Street London SE1 6PG
 92 Rockingham Street London SE1 6PG
 94 Rockingham Street London SE1 6PG
 Flat 11 Rankine House Rockingham Estate SE1 6PL
 Flat 12 Rankine House Rockingham Estate SE1 6PL
 Flat 10 Rankine House Rockingham Estate SE1 6PL
 42a Tarn Street London SE1 6PE
 Flat 1 Rankine House Rockingham Estate SE1 6PL
 Flat 13 Rankine House Rockingham Estate SE1 6PL
 Flat 17 Rankine House Rockingham Estate SE1 6PL
 Flat 18 Rankine House Rockingham Estate SE1 6PL
 Flat 16 Rankine House Rockingham Estate SE1 6PL
 Flat 14 Rankine House Rockingham Estate SE1 6PL
 Flat 15 Rankine House Rockingham Estate SE1 6PL
 Flat 9 Cartwright House Rockingham Estate SE1 6AN
 Flat 16 Cartwright House Rockingham Estate SE1 6AN
 Flat 2 Cartwright House Rockingham Estate SE1 6AN
 Flat 15 Cartwright House Rockingham Estate SE1 6AN
 Flat 13 Cartwright House Rockingham Estate SE1 6AN
 Flat 14 Cartwright House Rockingham Estate SE1 6AN
 Flat 3 Cartwright House Rockingham Estate SE1 6AN
 Flat 7 Cartwright House Rockingham Estate SE1 6AN
 Flat 8 Cartwright House Rockingham Estate SE1 6AN
 Flat 6 Cartwright House Rockingham Estate SE1 6AN
 Flat 4 Cartwright House Rockingham Estate SE1 6AN
 Flat 5 Cartwright House Rockingham Estate SE1 6AN
 Flat 10 Banks House Rockingham Estate SE1 6QQ
 Flat 11 Banks House Rockingham Estate SE1 6QQ
 Flat 1 Banks House Rockingham Estate SE1 6QQ
 Flat 8 Martin House Rockingham Estate SE1 6QP
 Flat 9 Martin House Rockingham Estate SE1 6QP
 Flat 12 Banks House Rockingham Estate SE1 6QQ
 Flat 16 Banks House Rockingham Estate SE1 6QQ
 Flat 17 Banks House Rockingham Estate SE1 6QQ
 Flat 15 Banks House Rockingham Estate SE1 6QQ
 Flat 13 Banks House Rockingham Estate SE1 6QQ
 Flat 14 Banks House Rockingham Estate SE1 6QQ
 Flat 7 Martin House Rockingham Estate SE1 6QP
 Flat 49 Martin House Rockingham Estate SE1 6QP
 Flat 5 Martin House Rockingham Estate SE1 6QP
 Flat 48 Martin House Rockingham Estate SE1 6QP
 Flat 46 Martin House Rockingham Estate SE1 6QP
 Flat 47 Martin House Rockingham Estate SE1 6QP
 Flat 50 Martin House Rockingham Estate SE1 6QP

162 Brook Drive London SE11 4TE
164 Brook Drive London SE11 4TE
146 Brook Drive London SE11 4TE
181 Brook Drive London SE11 4TG
183 Brook Drive London SE11 4TG
179 Brook Drive London SE11 4TG
169 Brook Drive London SE11 4TG
171 Brook Drive London SE11 4TG
185 Brook Drive London SE11 4TG
175a Brook Drive London SE11 4TG
175b Brook Drive London SE11 4TG
123 Canterbury Place London SE17 3AD
125 Canterbury Place London SE17 3AD
121 Canterbury Place London SE17 3AD
117 Canterbury Place London SE17 3AD
119 Canterbury Place London SE17 3AD
127 Canterbury Place London SE17 3AD
59 Canterbury Place London SE17 3AD
61 Canterbury Place London SE17 3AD
57 Canterbury Place London SE17 3AD
129 Canterbury Place London SE17 3AD
131 Canterbury Place London SE17 3AD
115 Canterbury Place London SE17 3AD
101 Canterbury Place London SE17 3AD
103 Canterbury Place London SE17 3AD
111 Canterbury Place London SE17 3AD
113 Canterbury Place London SE17 3AD
109 Canterbury Place London SE17 3AD
105 Canterbury Place London SE17 3AD
107 Canterbury Place London SE17 3AD
63 Canterbury Place London SE17 3AD
97 Canterbury Place London SE17 3AD
99 Canterbury Place London SE17 3AD
95 Canterbury Place London SE17 3AD
91 Canterbury Place London SE17 3AD
93 Canterbury Place London SE17 3AD
37 Hampton Street London SE17 3AN
45 Hampton Street London SE17 3AN
47 Hampton Street London SE17 3AN
43 Hampton Street London SE17 3AN
39 Hampton Street London SE17 3AN
41 Hampton Street London SE17 3AN
89 Canterbury Place London SE17 3AD
71 Canterbury Place London SE17 3AD
73 Canterbury Place London SE17 3AD
69 Canterbury Place London SE17 3AD
65 Canterbury Place London SE17 3AD
67 Canterbury Place London SE17 3AD
75 Canterbury Place London SE17 3AD
85 Canterbury Place London SE17 3AD
87 Canterbury Place London SE17 3AD
83 Canterbury Place London SE17 3AD
79 Canterbury Place London SE17 3AD
81 Canterbury Place London SE17 3AD
173 Brook Drive London SE11 4TG
193 Brook Drive London SE11 4TG
5 Dante Road London SE11 4RB
Flat G 4 Holyoak Road SE11 4RD
Flat H 4 Holyoak Road SE11 4RD
1 George Mathers Road London SE11 4RU
11 Dante Road London SE11 4RB
13 Dante Road London SE11 4RB
9 Dante Road London SE11 4RB
2 George Mathers Road London SE11 4RU
7 Dante Road London SE11 4RB
Flat F 4 Holyoak Road SE11 4RD
Flat J 2 Holyoak Road SE11 4RD
Flat K 2 Holyoak Road SE11 4RD
Flat I 2 Holyoak Road SE11 4RD
Flat G 2 Holyoak Road SE11 4RD
Flat H 2 Holyoak Road SE11 4RD
Flat L 2 Holyoak Road SE11 4RD
Flat D 4 Holyoak Road SE11 4RD
Flat E 4 Holyoak Road SE11 4RD

[illegible]

Flat C 4 Holyoak Road SE11 4RD
 Flat A 4 Holyoak Road SE11 4RD
 Flat B 4 Holyoak Road SE11 4RD
 15 Dante Road London SE11 4RB
 49 Dante Road London SE11 4RB
 51 Dante Road London SE11 4RB
 45 Dante Road London SE11 4RB
 41 Dante Road London SE11 4RB
 43 Dante Road London SE11 4RB
 53 Dante Road London SE11 4RB
 10 Holyoak Road London SE11 4RD
 12 Holyoak Road London SE11 4RD
 59 Dante Road London SE11 4RB
 55 Dante Road London SE11 4RB
 57 Dante Road London SE11 4RB
 39 Dante Road London SE11 4RB
 23 Dante Road London SE11 4RB
 25 Dante Road London SE11 4RB
 21 Dante Road London SE11 4RB
 17 Dante Road London SE11 4RB
 19 Dante Road London SE11 4RB
 27 Dante Road London SE11 4RB
 35 Dante Road London SE11 4RB
 37 Dante Road London SE11 4RB
 33 Dante Road London SE11 4RB
 29 Dante Road London SE11 4RB
 31 Dante Road London SE11 4RB
 Apartment 1906 1 St Gabriel Walk SE1 6FB
 Apartment 1907 1 St Gabriel Walk SE1 6FB
 Apartment 1905 1 St Gabriel Walk SE1 6FB
 Apartment 1903 1 St Gabriel Walk SE1 6FB
 Apartment 1904 1 St Gabriel Walk SE1 6FB
 Apartment 1908 1 St Gabriel Walk SE1 6FB
 Apartment 2004 1 St Gabriel Walk SE1 6FD
 Apartment 2005 1 St Gabriel Walk SE1 6FD
 Apartment 2003 1 St Gabriel Walk SE1 6FD
 Apartment 2001 1 St Gabriel Walk SE1 6FD
 Apartment 2002 1 St Gabriel Walk SE1 6FD
 Apartment 1902 1 St Gabriel Walk SE1 6FB
 Apartment 1802 1 St Gabriel Walk SE1 6FB
 Apartment 1803 1 St Gabriel Walk SE1 6FB
 Apartment 1801 1 St Gabriel Walk SE1 6FB
 Apartment 1707 1 St Gabriel Walk SE1 6FB
 Apartment 1708 1 St Gabriel Walk SE1 6FB
 Apartment 1804 1 St Gabriel Walk SE1 6FB
 Apartment 1808 1 St Gabriel Walk SE1 6FB
 Apartment 1901 1 St Gabriel Walk SE1 6FB
 Apartment 1807 1 St Gabriel Walk SE1 6FB
 Apartment 1805 1 St Gabriel Walk SE1 6FB
 Apartment 1806 1 St Gabriel Walk SE1 6FB
 Apartment 2006 1 St Gabriel Walk SE1 6FD
 Apartment 2206 1 St Gabriel Walk SE1 6FD
 Apartment 2207 1 St Gabriel Walk SE1 6FD
 Apartment 2205 1 St Gabriel Walk SE1 6FD
 Apartment 2203 1 St Gabriel Walk SE1 6FD
 Apartment 2204 1 St Gabriel Walk SE1 6FD
 Apartment 2208 1 St Gabriel Walk SE1 6FD
 Apartment 2304 1 St Gabriel Walk SE1 6FD
 Apartment 2305 1 St Gabriel Walk SE1 6FD
 Apartment 2303 1 St Gabriel Walk SE1 6FD
 Apartment 2301 1 St Gabriel Walk SE1 6FD
 Apartment 2302 1 St Gabriel Walk SE1 6FD
 Apartment 2202 1 St Gabriel Walk SE1 6FD
 Apartment 2102 1 St Gabriel Walk SE1 6FD
 Apartment 2103 1 St Gabriel Walk SE1 6FD
 Apartment 2101 1 St Gabriel Walk SE1 6FD
 Apartment 2007 1 St Gabriel Walk SE1 6FD
 Apartment 2008 1 St Gabriel Walk SE1 6FD
 Apartment 2104 1 St Gabriel Walk SE1 6FD
 Apartment 2108 1 St Gabriel Walk SE1 6FD
 Apartment 2201 1 St Gabriel Walk SE1 6FD
 Apartment 2107 1 St Gabriel Walk SE1 6FD
 Apartment 2105 1 St Gabriel Walk SE1 6FD
 Apartment 2106 1 St Gabriel Walk SE1 6FD

Flat 30 Martin House Rockingham Estate SE1 6QP
 78 Rockingham Street London SE1 6PG
 Unit 3 The Artworks SE17 1AY
 Unit 4 The Artworks SE17 1AY
 Unit 2 The Artworks SE17 1AY
 Unit 1 The Artworks SE17 1AY
 Unit 5 The Artworks SE17 1AY
 Unit 9 The Artworks SE17 1AY
 Unit 10 The Artworks SE17 1AY
 Unit 8 The Artworks SE17 1AY
 Unit 6 The Artworks SE17 1AY
 Unit 7 The Artworks SE17 1AY
 Unit 1 3 Elephant Road SE1 1LB
 Flat 14 Melbway House SE1 6BF
 Flat 15 Melbway House SE1 6BF
 Flat 13 Melbway House SE1 6BF
 Flat 11 Melbway House SE1 6BF
 Flat 12 Melbway House SE1 6BF
 Flat 16 Melbway House SE1 6BF
 Unit 3a Shopping Centre SE1 6TE
 Flat 19 Melbway House SE1 6BF
 Flat 17 Melbway House SE1 6BF
 Flat 18 Melbway House SE1 6BF
 Container C5 Shopping Centre SE1 6TE
 Container C6 Shopping Centre SE1 6TE
 Container C4 Shopping Centre SE1 6TE
 Container C2 Shopping Centre SE1 6TE
 Container C3 Shopping Centre SE1 6TE
 Container C7 Shopping Centre SE1 6TE
 Container C11 Shopping Centre SE1 6TE
 Container C12 Shopping Centre SE1 6TE
 Container C10 Shopping Centre SE1 6TE
 Container C8 Shopping Centre SE1 6TE
 Container C9 Shopping Centre SE1 6TE
 Container C1 Shopping Centre SE1 6TE
 Unit 14 The Artworks SE17 1AY
 Unit 15 The Artworks SE17 1AY
 Unit 13 The Artworks SE17 1AY
 Unit 11 The Artworks SE17 1AY
 Unit 12 The Artworks SE17 1AY
 Unit 16 The Artworks SE17 1AY
 Unit 20 The Artworks SE17 1AY
 Unit 21 The Artworks SE17 1AY
 Unit 19 The Artworks SE17 1AY
 Unit 17 The Artworks SE17 1AY
 Unit 18 The Artworks SE17 1AY
 Flat 10 Melbway House SE1 6BF
 Unit I Seventh Floor Hannibal House SE1 6TE
 Unit J Seventh Floor Hannibal House SE1 6TE
 Unit H Seventh Floor Hannibal House SE1 6TE
 Unit F Seventh Floor Hannibal House SE1 6TE
 Unit G Seventh Floor Hannibal House SE1 6TE
 Unit K Seventh Floor Hannibal House SE1 6TE
 Unit O Seventh Floor Hannibal House SE1 6TE
 Unit P Seventh Floor Hannibal House SE1 6TE
 Unit N Seventh Floor Hannibal House SE1 6TE
 Unit L Seventh Floor Hannibal House SE1 6TE
 Unit M Seventh Floor Hannibal House SE1 6TE
 Unit E Seventh Floor Hannibal House SE1 6TE
 Flat 34 26 Arch Street SE1 6AT
 Site Office Elephant Road SE1 6TW
 Unit C Seventh Floor Hannibal House SE1 6TE
 Unit D Seventh Floor Hannibal House SE1 6TE
 Unit B Seventh Floor Hannibal House SE1 6TE
 Unit A Seventh Floor Hannibal House SE1 6TE
 Flat 2 Melbway House SE1 6BF
 Flat 3 Melbway House SE1 6BF
 Flat 1 Melbway House SE1 6BF
 202 Shopping Centre SE1 6TE
 Flat 4 Melbway House SE1 6BF
 Flat 8 Melbway House SE1 6BF
 Flat 9 Melbway House SE1 6BF
 Flat 7 Melbway House SE1 6BF
 Flat 5 Melbway House SE1 6BF

Apartment 1706 1 St Gabriel Walk SE1 6FB
 Apartment 1306 1 St Gabriel Walk SE1 6FB
 Apartment 1307 1 St Gabriel Walk SE1 6FB
 Apartment 1305 1 St Gabriel Walk SE1 6FB
 Apartment 1303 1 St Gabriel Walk SE1 6FB
 Apartment 1304 1 St Gabriel Walk SE1 6FB
 Apartment 1308 1 St Gabriel Walk SE1 6FB
 Apartment 1404 1 St Gabriel Walk SE1 6FB
 Apartment 1405 1 St Gabriel Walk SE1 6FB
 Apartment 1403 1 St Gabriel Walk SE1 6FB
 Apartment 1401 1 St Gabriel Walk SE1 6FB
 Apartment 1402 1 St Gabriel Walk SE1 6FB
 Apartment 1302 1 St Gabriel Walk SE1 6FB
 Apartment 1202 1 St Gabriel Walk SE1 6FB
 Apartment 1203 1 St Gabriel Walk SE1 6FB
 Apartment 1201 1 St Gabriel Walk SE1 6FB
 Apartment 1107 1 St Gabriel Walk SE1 6FB
 Apartment 1108 1 St Gabriel Walk SE1 6FB
 Apartment 1204 1 St Gabriel Walk SE1 6FB
 Apartment 1208 1 St Gabriel Walk SE1 6FB
 Apartment 1301 1 St Gabriel Walk SE1 6FB
 Apartment 1207 1 St Gabriel Walk SE1 6FB
 Apartment 1205 1 St Gabriel Walk SE1 6FB
 Apartment 1406 1 St Gabriel Walk SE1 6FB
 Apartment 1606 1 St Gabriel Walk SE1 6FB
 Apartment 1607 1 St Gabriel Walk SE1 6FB
 Apartment 1605 1 St Gabriel Walk SE1 6FB
 Apartment 1603 1 St Gabriel Walk SE1 6FB
 Apartment 1604 1 St Gabriel Walk SE1 6FB
 Apartment 1608 1 St Gabriel Walk SE1 6FB
 Apartment 1704 1 St Gabriel Walk SE1 6FB
 Apartment 1705 1 St Gabriel Walk SE1 6FB
 Apartment 1703 1 St Gabriel Walk SE1 6FB
 Apartment 1701 1 St Gabriel Walk SE1 6FB
 Apartment 1702 1 St Gabriel Walk SE1 6FB
 Apartment 1602 1 St Gabriel Walk SE1 6FB
 Apartment 1502 1 St Gabriel Walk SE1 6FB
 Apartment 1503 1 St Gabriel Walk SE1 6FB
 Apartment 1501 1 St Gabriel Walk SE1 6FB
 Apartment 1407 1 St Gabriel Walk SE1 6FB
 Apartment 1408 1 St Gabriel Walk SE1 6FB
 Apartment 1504 1 St Gabriel Walk SE1 6FB
 Apartment 1508 1 St Gabriel Walk SE1 6FB
 Apartment 1601 1 St Gabriel Walk SE1 6FB
 Apartment 1507 1 St Gabriel Walk SE1 6FB
 Apartment 1505 1 St Gabriel Walk SE1 6FB
 Apartment 1506 1 St Gabriel Walk SE1 6FB
 19 Howell Walk London SE1 6TL
 2 Howell Walk London SE1 6TL
 18 Howell Walk London SE1 6TL
 16 Howell Walk London SE1 6TL
 17 Howell Walk London SE1 6TL
 20 Howell Walk London SE1 6TL
 28 Howell Walk London SE1 6TL
 3 Howell Walk London SE1 6TL
 26 Howell Walk London SE1 6TL
 22 Howell Walk London SE1 6TL
 24 Howell Walk London SE1 6TL
 15 Howell Walk London SE1 6TL
 92 Walworth Road London SE1 6SW
 84 Walworth Road London SE1 6SW
 4 Hampton Street London SE1 6SN
 First Floor Flat 6 Hampton Street SE1 6SN
 Draper Tenants Hall 1 Howell Walk SE1 6TL
 13 Howell Walk London SE1 6TL
 14 Howell Walk London SE1 6TL
 12 Howell Walk London SE1 6TL
 10 Howell Walk London SE1 6TL
 11 Howell Walk London SE1 6TL
 4 Howell Walk London SE1 6TL
 Flat 3 Sherston Court SE1 6SG
 Flat 37 Sherston Court SE1 6SG
 Flat 26 Sherston Court SE1 6SG
 Flat 24 Sherston Court SE1 6SG

Flat 6 Melbway House SE1 6BF
 Crossway United Reform Church 100 New Kent Road SE1 6TU
 Unit T Seventh Floor Hannibal House SE1 6TE
 Unit U Seventh Floor Hannibal House SE1 6TE
 Unit S Seventh Floor Hannibal House SE1 6TE
 Unit Q Seventh Floor Hannibal House SE1 6TE
 Unit R Seventh Floor Hannibal House SE1 6TE
 Unit V Seventh Floor Hannibal House SE1 6TE
 Unit Z Seventh Floor Hannibal House SE1 6TE
 Unit 1 Metro Central Heights SE1 6BN
 Unit Y Seventh Floor Hannibal House SE1 6TE
 Unit W Seventh Floor Hannibal House SE1 6TE
 Unit X Seventh Floor Hannibal House SE1 6TE
 Unit 35 The Artworks SE17 1AY
 Unit 36 The Artworks SE17 1AY
 Unit 34 The Artworks SE17 1AY
 Unit 32 The Artworks SE17 1AY
 Unit 33 The Artworks SE17 1AY
 Unit 37 The Artworks SE17 1AY
 Unit 41 The Artworks SE17 1AY
 Unit 42 The Artworks SE17 1AY
 Unit 40 The Artworks SE17 1AY
 Unit 38 The Artworks SE17 1AY
 Unit 39 The Artworks SE17 1AY
 Unit 31 The Artworks SE17 1AY
 Unit 23 The Artworks SE17 1AY
 Unit 24 The Artworks SE17 1AY
 Unit 22 The Artworks SE17 1AY
 Unit 15 Shopping Centre SE17 1AY
 Unit 25 The Artworks SE17 1AY
 Unit 29 The Artworks SE17 1AY
 Unit 30 The Artworks SE17 1AY
 Unit 28 The Artworks SE17 1AY
 Unit 26 The Artworks SE17 1AY
 Unit 27 The Artworks SE17 1AY
 62 Rockingham Street London SE1 6PG
 64 Rockingham Street London SE1 6PG
 60 Rockingham Street London SE1 6PG
 56 Rockingham Street London SE1 6PG
 58 Rockingham Street London SE1 6PG
 66 Rockingham Street London SE1 6PG
 74 Rockingham Street London SE1 6PG
 76 Rockingham Street London SE1 6PG
 72 Rockingham Street London SE1 6PG
 68 Rockingham Street London SE1 6PG
 70 Rockingham Street London SE1 6PG
 108 Rockingham Street London SE1 6PG
 7 Elephant Road London SE17 1LB
 Railway Arch 113 Elephant Road SE17 1LB
 Unit 43 The Artworks SE17 1AY
 133c Elephant Road London SE17 1LB
 104 Rockingham Street London SE1 6PG
 106 Rockingham Street London SE1 6PG
 102 Rockingham Street London SE1 6PG
 100 Rockingham Street London SE1 6PG
 Pitch 46 Shopping Centre SE1 6TE
 Pitch 13 Shopping Centre SE1 6TE
 Pitch 14 Shopping Centre SE1 6TE
 Pitch 12 Shopping Centre SE1 6TE
 Pitch 10 Shopping Centre SE1 6TE
 Pitch 11 Shopping Centre SE1 6TE
 Pitch 15 Shopping Centre SE1 6TE
 Pitch 19 Shopping Centre SE1 6TE
 Pitch 20 Shopping Centre SE1 6TE
 Pitch 18 Shopping Centre SE1 6TE
 Pitch 16 And C11 Shopping Centre SE1 6TE
 Pitch 17 Shopping Centre SE1 6TE
 Pitch 9 Shopping Centre SE1 6TE
 Pitch 1 Shopping Centre SE1 6TE
 Pitch 2 Shopping Centre SE1 6TE
 Container C15 Shopping Centre SE1 6TE
 Container C13 Shopping Centre SE1 6TE
 Container C14 Shopping Centre SE1 6TE
 Pitch 3 Shopping Centre SE1 6TE

Flat 25 Sherston Court SE1 6SG
 Flat 38 Sherston Court SE1 6SG
 Flat 41 Sherston Court SE1 6SG
 Flat 42 Sherston Court SE1 6SG
 Flat 40 Sherston Court SE1 6SG
 Flat 39 Sherston Court SE1 6SG
 Flat 4 Sherston Court SE1 6SG
 Flat 23 Sherston Court SE1 6SG
 8 Howell Walk London SE1 6TL
 9 Howell Walk London SE1 6TL
 7 Howell Walk London SE1 6TL
 5 Howell Walk London SE1 6TL
 6 Howell Walk London SE1 6TL
 Flat 1 Sherston Court SE1 6SG
 Flat 21 Sherston Court SE1 6SG
 Flat 22 Sherston Court SE1 6SG
 Flat 20 Sherston Court SE1 6SG
 Flat 19 Sherston Court SE1 6SG
 Flat 2 Sherston Court SE1 6SG
 99 Newington Butts London SE1 6SF
 Apartment 2505 1 St Gabriel Walk SE1 6FD
 Apartment 2506 1 St Gabriel Walk SE1 6FD
 Apartment 2504 1 St Gabriel Walk SE1 6FD
 Apartment 2502 1 St Gabriel Walk SE1 6FD
 Apartment 2503 1 St Gabriel Walk SE1 6FD
 Apartment 2507 1 St Gabriel Walk SE1 6FD
 Apartment 2603 1 St Gabriel Walk SE1 6FD
 Apartment 2602 1 St Gabriel Walk SE1 6FD
 Apartment 2508 1 St Gabriel Walk SE1 6FD
 Apartment 2601 1 St Gabriel Walk SE1 6FD
 Apartment 2501 1 St Gabriel Walk SE1 6FD
 Apartment 2401 1 St Gabriel Walk SE1 6FD
 Apartment 2402 1 St Gabriel Walk SE1 6FD
 Apartment 2308 1 St Gabriel Walk SE1 6FD
 Apartment 2306 1 St Gabriel Walk SE1 6FD
 Apartment 2307 1 St Gabriel Walk SE1 6FD
 Apartment 2403 1 St Gabriel Walk SE1 6FD
 Apartment 2407 1 St Gabriel Walk SE1 6FD
 Apartment 2408 1 St Gabriel Walk SE1 6FD
 Apartment 2406 1 St Gabriel Walk SE1 6FD
 Apartment 2404 1 St Gabriel Walk SE1 6FD
 Apartment 2405 1 St Gabriel Walk SE1 6FD
 Flat 401 Highline Building SE17 3AF
 115 Newington Butts London SE1 6SF
 117 Newington Butts London SE1 6SF
 113 Newington Butts London SE1 6SF
 109 Newington Butts London SE1 6SF
 111 Newington Butts London SE1 6SF
 119 Newington Butts London SE1 6SF
 127 Newington Butts London SE1 6SF
 129 Newington Butts London SE1 6SF
 125 Newington Butts London SE1 6SF
 121 Newington Butts London SE1 6SF
 123 Newington Butts London SE1 6SF
 107 Newington Butts London SE1 6SF
 4 Spare Street London SE17 3EP
 5 Spare Street London SE17 3EP
 3 Spare Street London SE17 3EP
 1 Spare Street London SE17 3EP
 2 Spare Street London SE17 3EP
 Draper Hall 44 Hampton Street SE1 6SN
 101 Newington Butts London SE1 6SF
 105 Newington Butts London SE1 6SF
 91-95 Newington Butts London SE1 6SF
 Unit 11 91-95 Newington Butts SE1 6SF
 Unit 12 91-95 Newington Butts SE1 6SF
 49 Hampton Street London SE17 3AN
 Flat 41 Draper House SE1 6SX
 Flat 42 Draper House SE1 6SX
 Flat 40 Draper House SE1 6SX
 Flat 38 Draper House SE1 6SX
 Flat 39 Draper House SE1 6SX
 Flat 43 Draper House SE1 6SX
 Flat 47 Draper House SE1 6SX
 Pitch 7 Shopping Centre SE1 6TE
 Pitch 8 Shopping Centre SE1 6TE
 Pitch 6 Shopping Centre SE1 6TE
 Pitch 4 Shopping Centre SE1 6TE
 Pitch 5 Shopping Centre SE1 6TE
 Pitch 38 Shopping Centre SE1 6TE
 Pitch 39 Shopping Centre SE1 6TE
 Pitch 37 Shopping Centre SE1 6TE
 Pitch 35 Shopping Centre SE1 6TE
 Pitch 36 Shopping Centre SE1 6TE
 Pitch 40 Shopping Centre SE1 6TE
 Pitch 44 Shopping Centre SE1 6TE
 Pitch 45 Shopping Centre SE1 6TE
 Pitch 43 Shopping Centre SE1 6TE
 Pitch 41 Shopping Centre SE1 6TE
 Pitch 42 Shopping Centre SE1 6TE
 Pitch 34 Shopping Centre SE1 6TE
 Pitch 24 Shopping Centre SE1 6TE
 Pitch 25 Shopping Centre SE1 6TE
 Pitch 23 Shopping Centre SE1 6TE
 Pitch 21 Shopping Centre SE1 6TE
 Pitch 22 Shopping Centre SE1 6TE
 Pitch 26 Shopping Centre SE1 6TE
 Pitch 30 And 31 Shopping Centre SE1 6TE
 Pitch 32 And 33 Shopping Centre SE1 6TE
 Pitch 29 Shopping Centre SE1 6TE
 Pitch 27 Shopping Centre SE1 6TE
 Pitch 28 Shopping Centre SE1 6TE
 By Email
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 28 Sutherland Square SE17 3EQ
 First Floor Flat 110 Brook Drive SE11 4TQ
 Second Floor Flat 110 Brook Drive SE11 4TQ
 Flat 1 120 Brook Drive SE11 4TQ
 Flat 2 120 Brook Drive SE11 4TQ
 Flat 3 120 Brook Drive SE11 4TQ
 Flat A 108 Brook Drive SE11 4TQ
 Flat A 112 Brook Drive SE11 4TQ
 Flat A 114 Brook Drive SE11 4TQ
 Flat B 108 Brook Drive SE11 4TQ
 Flat B 112 Brook Drive SE11 4TQ
 Flat C 108 Brook Drive SE11 4TQ
 Ground Floor 114 Brook Drive SE11 4TQ
 Ground Floor Flat 110 Brook Drive SE11 4TQ
 Ground Floor Flat 112 Brook Drive SE11 4TQ
 116 Brook Drive London SE11 4TQ
 118 Brook Drive London SE11 4TQ
 122 Brook Drive London SE11 4TQ
 124 Brook Drive London SE11 4TQ
 126 Brook Drive London SE11 4TE
 128 Brook Drive London SE11 4TE
 130 Brook Drive London SE11 4TE
 132 Brook Drive London SE11 4TE
 134 Brook Drive London SE11 4TE
 136 Brook Drive London SE11 4TE
 138 Brook Drive London SE11 4TE
 126a Brook Drive London SE11 4TE
 130a Brook Drive London SE11 4TE
 132a Brook Drive London SE11 4TE
 134a Brook Drive London SE11 4TE
 136a Brook Drive London SE11 4TE
 1 Castlebrook Close London SE11 4UL
 2 Castlebrook Close London SE11 4UL

Flat 48 Draper House SE1 6SX
Flat 46 Draper House SE1 6SX
Flat 44 Draper House SE1 6SX
Flat 45 Draper House SE1 6SX
Flat 37 Draper House SE1 6SX
Flat 29 Draper House SE1 6SX
Flat 30 Draper House SE1 6SX
Flat 28 Draper House SE1 6SX
Flat 26 Draper House SE1 6SX
Flat 27 Draper House SE1 6SX
Flat 31 Draper House SE1 6SX
Flat 35 Draper House SE1 6SX
Flat 36 Draper House SE1 6SX
Flat 34 Draper House SE1 6SX
Flat 32 Draper House SE1 6SX
Flat 33 Draper House SE1 6SX
Flat 49 Draper House SE1 6SX
Flat 65 Draper House SE1 6SX
Flat 66 Draper House SE1 6SX
Flat 64 Draper House SE1 6SX
Flat 62 Draper House SE1 6SX
Flat 63 Draper House SE1 6SX
Flat 67 Draper House SE1 6SX
Flat 71 Draper House SE1 6SY
Flat 72 Draper House SE1 6SY
Flat 70 Draper House SE1 6SX
Flat 68 Draper House SE1 6SX
Flat 69 Draper House SE1 6SX
Flat 61 Draper House SE1 6SX
Flat 53 Draper House SE1 6SX
Flat 54 Draper House SE1 6SX
Flat 52 Draper House SE1 6SX
Flat 50 Draper House SE1 6SX
Flat 51 Draper House SE1 6SX
Flat 55 Draper House SE1 6SX
Flat 59 Draper House SE1 6SX
Flat 60 Draper House SE1 6SX
Flat 58 Draper House SE1 6SX
Flat 56 Draper House SE1 6SX
Flat 57 Draper House SE1 6SX
Flat 25 Draper House SE1 6SX
Flat 92 Walworth Road SE1 6SW
1 Hampton House Hampton Street SE1 6SN
Flat H 14 Dante Road SE11 4RB
Flat H 12 Dante Road SE11 4RB
Flat H 6 Dante Road SE11 4RB
Flat 2 Draper House SE1 6SX
Flat 4 Draper House SE1 6SX
4 Hampton House Hampton Street SE1 6SN
3 Hampton House Hampton Street SE1 6SN
2 Hampton House Hampton Street SE1 6SN
Flat 3 Draper House SE1 6SX
Flat H 8 Dante Road SE11 4RB
Flat F 14 Dante Road SE11 4RB
Flat F 8 Dante Road SE11 4RB
Flat E 6 Dante Road SE11 4RB
Flat E 8 Dante Road SE11 4RB
Flat E 12 Dante Road SE11 4RB
Flat F 12 Dante Road SE11 4RB
Flat G 12 Dante Road SE11 4RB
Flat G 6 Dante Road SE11 4RB
Flat G 8 Dante Road SE11 4RB
Flat F 6 Dante Road SE11 4RB
Flat G 14 Dante Road SE11 4RB
Flat 5 Draper House SE1 6SX
Flat 17 Draper House SE1 6SX
Flat 18 Draper House SE1 6SX
Flat 16 Draper House SE1 6SX
Flat 14 Draper House SE1 6SX
Flat 15 Draper House SE1 6SX
Flat 19 Draper House SE1 6SX
Flat 23 Draper House SE1 6SX
Flat 24 Draper House SE1 6SX
Flat 22 Draper House SE1 6SX

3 Castlebrook Close London SE11 4UL
4 Castlebrook Close London SE11 4UL
5 Castlebrook Close London SE11 4UL
6 Castlebrook Close London SE11 4UL
7 Castlebrook Close London SE11 4UL
8 Castlebrook Close London SE11 4UL
9 Castlebrook Close London SE11 4UL
14 Castlebrook Close London SE11 4UL
15 Castlebrook Close London SE11 4UL
16 Castlebrook Close London SE11 4UL
17 Castlebrook Close London SE11 4UL
5 Dugard Way London SE11 4TH
1 Dugard Way London SE11 4TH
2 Dugard Way London SE11 4TH
Flat 1 Bolton House 9 George Mathers Road SE11 4BS
Flat 1 Freeman House 10 George Mathers Road SE11 4BS
Flat 1 Goddard House 3 George Mathers Raod SE11 4BG
Flat 1 Limelight House 4 George Mathers Road SE11 4RU
Flat 1 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 10 Goddard House 3 George Mathers Road SE11 4BG
Flat 10 Limelight House 4 George Mathers Road SE11 4RU
Flat 10 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 11 Goddard House 3 George Mathers Road SE11 4BG
Flat 11 Limelight House 4 George Mathers Road SE11 4RU
Flat 11 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 12 Goddard House 3 George Mathers Raod SE11 4BG
Flat 12 Limelight House 4 George Mathers Road SE11 4RU
Flat 12 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 13 Goddard House 3 George Mathers Road SE11 4BG
Flat 13 Limelight House 4 George Mathers Road SE11 4RU
Flat 13 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 14 Goddard House 3 George Mathers Road SE11 4BG
Flat 14 Limelight House 4 George Mathers Road SE11 4RU
Flat 14 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 15 Goddard House 3 George Mathers Road SE11 4BG
Flat 15 Limelight House 4 George Mathers Road SE11 4RU
Flat 15 Wilmot House 5 George Mathers Raod SE11 4BQ
Flat 16 Goddard House 3 George Mathers Raod SE11 4BG
Flat 16 Limelight House 4 George Mathers Road SE11 4RU
Flat 16 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 17 Goddard House 3 George Mathers Road SE11 4BG
Flat 17 Limelight House 4 George Mathers Raod SE11 4RU
Flat 17 Wilmot House 5 George Mathers Raod SE11 4BQ
Flat 18 Goddard House 3 George Mathers Raod SE11 4BG
Flat 18 Limelight House 4 George Mathers Road SE11 4RU
Flat 18 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 19 Goddard House 3 George Mathers Road SE11 4BG
Flat 19 Limelight House 4 George Mathers Road SE11 4RU
Flat 19 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 2 Bolton House 9 George Mathers Road SE11 4BS
Flat 2 Freeman House 10 George Mathers Raod SE11 4BS
Flat 2 Goddard House 3 George Mathers Road SE11 4BG
Flat 2 Limelight House 4 George Mathers Road SE11 4RU
Flat 2 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 20 Goddard House 3 George Mathers Raod SE11 4BG
Flat 20 Limelight House 4 George Mathers Raod SE11 4RU
Flat 20 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 21 Goddard House 3 George Mathers Raod SE11 4BG
Flat 21 Limelight House 4 George Mathers Road SE11 4RU
Flat 21 Wilmot House 5 George Mathers Raod SE11 4BQ
Flat 22 Goddard House 3 George Mathers Road SEE 4BG
Flat 22 Limelight House 4 George Mathers Road SE11 4RU
Flat 22 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 23 Goddard House 3 George Mathers Road SE11 4BG
Flat 23 Limelight House 4 George Mathers Road SE11 4RU
Flat 23 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 24 Goddard House 3 George Mathers Road SE11 4BG
Flat 24 Limelight House 4 George Mathers Road SE11 4RU
Flat 24 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 25 Goddard House 3 George Mathers Road SE11 4BG
Flat 25 Limelight House 4 George Mathers Road SE11 4RU
Flat 25 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 26 Goddard House 3 George Mathers Road SE11 4BG
Flat 26 Limelight House 4 George Mathers Road SE11 4RU

Flat 20 Draper House SE1 6SX
 Flat 21 Draper House SE1 6SX
 Flat 13 Draper House SE1 6SX
 Flat 7 Draper House SE1 6SX
 7 Hampton House Hampton Street SE1 6SN
 6 Hampton House Hampton Street SE1 6SN
 5 Hampton House Hampton Street SE1 6SN
 Flat 6 Draper House SE1 6SX
 Flat 8 Draper House SE1 6SX
 Flat 11 Draper House SE1 6SX
 Flat 12 Draper House SE1 6SX
 Flat 10 Draper House SE1 6SX
 8 Hampton House Hampton Street SE1 6SN
 Flat 9 Draper House SE1 6SX
 Flat 136 Draper House SE1 6SY
 Flat 137 Draper House SE1 6SY
 Flat 135 Draper House SE1 6SY
 Flat 133 Draper House SE1 6SY
 Flat 134 Draper House SE1 6SY
 Flat 138 Draper House SE1 6SY
 Arch 146 8 Hampton Street SE1 6SN
 Arch 147 8 Hampton Street SE1 6SN
 Flat 141 Draper House SE1 6SY
 Flat 139 Draper House SE1 6SY
 Flat 140 Draper House SE1 6SY
 Flat 132 Draper House SE1 6SY
 Flat 124 Draper House SE1 6SY
 Flat 125 Draper House SE1 6SY
 Flat 123 Draper House SE1 6SY
 Flat 121 Draper House SE1 6SY
 Flat 122 Draper House SE1 6SY
 Flat 126 Draper House SE1 6SY
 Flat 130 Draper House SE1 6SY
 Flat 131 Draper House SE1 6SY
 Flat 129 Draper House SE1 6SY
 Flat 127 Draper House SE1 6SY
 Flat 128 Draper House SE1 6SY
 Arch 148 10-12 Hampton Street SE1 6SN
 Store 72 Winchester Close SE17 3DH
 Store 37 Winchester Close SE17 3DQ
 Arch 149 10-12 Hampton Street SE1 6SN
 Arch 144 Eagle Yard SE1 6SP
 Railway Arch 145 Eagle Yard SE1 6SW
 Flat 120 Draper House SE1 6SY
 Flat 88 Draper House SE1 6SY
 Flat 89 Draper House SE1 6SY
 Flat 87 Draper House SE1 6SY
 Flat 85 Draper House SE1 6SY
 Flat 86 Draper House SE1 6SY
 Flat 90 Draper House SE1 6SY
 Flat 94 Draper House SE1 6SY
 Flat 95 Draper House SE1 6SY
 Flat 93 Draper House SE1 6SY
 Flat 91 Draper House SE1 6SY
 Flat 92 Draper House SE1 6SY
 Flat 84 Draper House SE1 6SY
 Flat 76 Draper House SE1 6SY
 Flat 77 Draper House SE1 6SY
 Flat 75 Draper House SE1 6SY
 Flat 73 Draper House SE1 6SY
 Flat 74 Draper House SE1 6SY
 Flat 78 Draper House SE1 6SY
 Flat 82 Draper House SE1 6SY
 Flat 83 Draper House SE1 6SY
 Flat 81 Draper House SE1 6SY
 Flat 79 Draper House SE1 6SY
 Flat 80 Draper House SE1 6SY
 Flat 96 Draper House SE1 6SY
 Flat 112 Draper House SE1 6SY
 Flat 113 Draper House SE1 6SY
 Flat 111 Draper House SE1 6SY
 Flat 109 Draper House SE1 6SY
 Flat 110 Draper House SE1 6SY
 Flat 114 Draper House SE1 6SY

Flat 26 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 27 Goddard House 3 George Mathers Road SE11 4BG
 Flat 27 Limelight House 4 George Mathers Road SE11 4RU
 Flat 27 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 28 Goddard House 3 George Mathers Road SE11 4BG
 Flat 28 Linelight House 4 George Mathers Road SE11 4RU
 Flat 28 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 29 Limelight House 4 George Mathers Road SE11 4RU
 Flat 29 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 3 Bolton House 9 George Mathers Road SE11 4BS
 Flat 3 Freeman House 10 George Mathers Road SE11 4BS
 Flat 3 Goddard House 3 George Mathers Road SE11 4BG
 Flat 3 Limelight House 4 George Mathers Road SE11 4RU
 Flat 3 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 30 Limelight House 4 George Mathers Road SE11 4RU
 Flat 30 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 31 Limelight House 4 George Mathers Road SE11 4RU
 Flat 31 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 32 Limelight House 4 George Mathers Road SE11 4RU
 Flat 32 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 33 Limelight House 4 George Mathers Road SE11 4RU
 Flat 4 Bolton House 9 George Mathers Road SE11 4BS
 Flat 4 Freeman House 10 George Mathers Road SE11 4BS
 Flat 4 Goddard House 3 George Mathers Road SE11 4BG
 Flat 4 Limelight House 4 George Mathers Road SE11 4RU
 Flat 4 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 5 Bolton House 9 George Mathers Road SE11 4BS
 Flat 5 Freeman House 10 George Mathers Road SE11 4BS
 Flat 5 Goddard House 3 George Mathers Road SE11 4BG
 Flat 5 Limelight House 4 George Mathers Road SE11 4RU
 Flat 5 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 6 Bolton House 9 George Mathers Road SE11 4BS
 Flat 6 Freeman House 10 George Mathers Road SE11 4BS
 Flat 6 Goddard House 3 George Mathers Road SE11 4BG
 Flat 6 Limelight House 4 George Mathers Road SE11 4RU
 Flat 6 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 7 Bolton House 9 George Mathers Road SE11 4BS
 Flat 7 Freeman House 10 George Mathers Road SE11 4BS
 Flat 7 Goddard House 3 George Mathers Road SE11 4BG
 Flat 7 Limelight House 4 George Mathers Road SE11 4RU
 Flat 7 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 8 Bolton House 9 George Mathers Road SE11 4BS
 Flat 8 Freeman House 10 George Mathers Road SE11 4BS
 Flat 8 Goddard House 3 George Mathers Road SE11 4BG
 Flat 8 Limelight House 4 George Mathers Road SE11 4RU
 Flat 8 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 9 Freeman House 10 George Mathers Road SE11 4BS
 Flat 9 Goddard House 3 George Mathers Road SE11 4BG
 Flat 9 Limelight House 4 George Mathers Road SE11 4RU
 Flat 9 Wilmot House 5 George Mathers Road SE11 4BQ
 6 George Mathers Road London SE11 4RU
 7 George Mathers Road London SE11 4RU
 8 George Mathers Road London SE11 4RU
 Apartment 1 3 Holyoak Road SE11 4DU
 Apartment 10 3 Holyoak Road SE11 4DU
 Apartment 11 3 Holyoak Road SE11 4DU
 Apartment 12 3 Holyoak Road SE11 4DU
 Apartment 13 3 Holyoak Road SE11 4DU
 Apartment 14 3 Holyoak Road SE11 4DU
 Apartment 15 3 Holyoak Road SE11 4DU
 Apartment 16 3 Holyoak Road SE11 4DU
 Apartment 17 3 Holyoak Road SE11 4DU
 Apartment 18 3 Holyoak Road SE11 4DU
 Apartment 19 3 Holyoak Road SE11 4DU
 Apartment 2 3 Holyoak Road SE11 4DU
 Apartment 20 3 Holyoak Road SE11 4DU
 Apartment 21 3 Holyoak Road SE11 4DU
 Apartment 22 3 Holyoak Road SE11 4DU
 Apartment 23 3 Holyoak Road SE11 4DU
 Apartment 3 3 Holyoak Road SE11 4DU
 Apartment 4 3 Holyoak Road SE11 4DU
 Apartment 5 3 Holyoak Road SE11 4DU
 Apartment 6 3 Holyoak Road SE11 4DU
 Apartment 7 3 Holyoak Road SE11 4DU

Flat 118 Draper House SE1 6SY
 Flat 119 Draper House SE1 6SY
 Flat 117 Draper House SE1 6SY
 Flat 115 Draper House SE1 6SY
 Flat 116 Draper House SE1 6SY
 Flat 108 Draper House SE1 6SY
 Flat 100 Draper House SE1 6SY
 Flat 101 Draper House SE1 6SY
 Flat 99 Draper House SE1 6SY
 Flat 97 Draper House SE1 6SY
 Flat 98 Draper House SE1 6SY
 Flat 102 Draper House SE1 6SY
 Flat 106 Draper House SE1 6SY
 Flat 107 Draper House SE1 6SY
 Flat 105 Draper House SE1 6SY
 Flat 103 Draper House SE1 6SY
 Flat 104 Draper House SE1 6SY
 56 Winchester Close London SE17 3DH
 58 Winchester Close London SE17 3DH
 54 Winchester Close London SE17 3DH
 50 Winchester Close London SE17 3DH
 52 Winchester Close London SE17 3DH
 6 Winchester Close London SE17 3DH
 66 Winchester Close London SE17 3DH
 68 Winchester Close London SE17 3DH
 64 Winchester Close London SE17 3DH
 60 Winchester Close London SE17 3DH
 62 Winchester Close London SE17 3DH
 48 Winchester Close London SE17 3DH
 34 Winchester Close London SE17 3DH
 36 Winchester Close London SE17 3DH
 32 Winchester Close London SE17 3DH
 28 Winchester Close London SE17 3DH
 30 Winchester Close London SE17 3DH
 38 Winchester Close London SE17 3DH
 44 Winchester Close London SE17 3DH
 46 Winchester Close London SE17 3DH
 42 Winchester Close London SE17 3DH
 4 Winchester Close London SE17 3DH
 40 Winchester Close London SE17 3DH
 70 Winchester Close London SE17 3DH
 1 Winchester Close London SE17 3DQ
 11 Winchester Close London SE17 3DQ
 98 Winchester Close London SE17 3DH
 94 Winchester Close London SE17 3DH
 96 Winchester Close London SE17 3DH
 13 Winchester Close London SE17 3DQ
 21 Winchester Close London SE17 3DQ
 23 Winchester Close London SE17 3DQ
 19 Winchester Close London SE17 3DQ
 15 Winchester Close London SE17 3DQ
 17 Winchester Close London SE17 3DQ
 92 Winchester Close London SE17 3DH
 78 Winchester Close London SE17 3DH
 8 Winchester Close London SE17 3DH
 76 Winchester Close London SE17 3DH
 72 Winchester Close London SE17 3DH
 74 Winchester Close London SE17 3DH
 80 Winchester Close London SE17 3DH
 88 Winchester Close London SE17 3DH
 90 Winchester Close London SE17 3DH
 86 Winchester Close London SE17 3DH
 82 Winchester Close London SE17 3DH
 84 Winchester Close London SE17 3DH
 26 Winchester Close London SE17 3DH
 30 Marlborough Close London SE17 3AP
 32 Marlborough Close London SE17 3AP
 28 Marlborough Close London SE17 3AP
 24 Marlborough Close London SE17 3AP
 26 Marlborough Close London SE17 3AP
 34 Marlborough Close London SE17 3AP
 8 Marlborough Close London SE17 3AP
 1 Marlborough Close London SE17 3AW
 6 Marlborough Close London SE17 3AP

Apartment 8 3 Holyoak Road SE11 4DU
 Apartment 9 3 Holyoak Road SE11 4DU
 1 Holyoak Road London SE11 4DU
 5 Holyoak Road London SE11 4DU
 7 Holyoak Road London SE11 4DU
 9 Holyoak Road London SE11 4DU
 Apartment 1 2 Kennington Lane SE11 4FA
 Apartment 10 2 Kennington Lane SE11 4FA
 Apartment 11 2 Kennington Lane SE11 4FA
 Apartment 12 2 Kennington Lane SE11 4FA
 Apartment 13 2 Kennington Lane SE11 4FA
 Apartment 14 2 Kennington Lane SE11 4FA
 Apartment 15 2 Kennington Lane SE11 4FA
 Apartment 16 2 Kennington Lane SE11 4FA
 Apartment 17 2 Kennington Lane SE11 4FA
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 Apartment 19 2 Kennington Lane SE11 4FA
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 Apartment 20 2 Kennington Lane SE11 4FA
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 Apartment 22 2 Kennington Lane SE11 4FA
 Apartment 23 2 Kennington Lane SE11 4FA
 Apartment 24 2 Kennington Lane SE11 4FA
 Apartment 25 2 Kennington Lane SE11 4FA
 Apartment 26 2 Kennington Lane SE11 4FA
 Apartment 27 2 Kennington Lane SE11 4FA
 Apartment 28 2 Kennington Lane SE11 4FA
 Apartment 29 2 Kennington Lane SE11 4FA
 Apartment 3 2 Kennington Lane SE11 4FA
 Apartment 30 2 Kennington Lane SE11 4FA
 Apartment 31 2 Kennington Lane SE11 4FA
 Apartment 32 2 Kennington Lane SE11 4FA
 Apartment 33 2 Kennington Lane SE11 4FA
 Apartment 34 2 Kennington Lane SE11 4FA
 Apartment 35 2 Kennington Lane SE11 4FA
 Apartment 36 2 Kennington Lane SE11 4FA
 Apartment 37 2 Kennington Lane SE11 4FA
 Apartment 38 2 Kennington Lane SE11 4FA
 Apartment 39 2 Kennington Lane SE11 4FA
 Apartment 4 2 Kennington Lane SE11 4FA
 Apartment 40 2 Kennington Lane SE11 4FA
 Apartment 41 2 Kennington Lane SE11 4FA
 Apartment 42 2 Kennington Lane SE11 4FA
 Apartment 43 2 Kennington Lane SE11 4FA
 Apartment 44 2 Kennington Lane SE11 4FA
 Apartment 45 2 Kennington Lane SE11 4FA
 Apartment 46 2 Kennington Lane SE11 4FA
 Apartment 5 2 Kennington Lane SE11 4FA
 Apartment 6 2 Kennington Lane SE11 4FA
 Apartment 7 2 Kennington Lane SE11 4FA
 Apartment 8 2 Kennington Lane SE11 4FA
 Apartment 9 2 Kennington Lane SE11 4FA
 6 - 12 Kennington Lane London SE11 4LT
 138 Kewington Butts London SE11 4QU
 1 Polperro Mews London SE11 4TY
 2 Polperro Mews London SE11 4TY
 3 Polperro Mews London SE11 4TY
 4 Polperro Mews London SE11 4TY
 5 Polperro Mews London SE11 4TY
 6 Polperro Mews London SE11 4TY
 1 Sullivan Road London SE11 4UH
 3 Sullivan Road London SE11 4UH
 5 Sullivan Road London SE11 4UH
 7 Sullivan Road London SE11 4UH
 Flat 19 26 Arch Street SE1 6AT
 10.02 One The Elephant London SE1 6FB
 Melbway House London SE1 6BF
 Email X
 Email
 37d Oswin St. Kennington SE11 4TF
 1c Austral Street London SE11 4SJ
 25 Crystal Court London SE19 1UZ
 91b Penton Place London SE17 3JR
 3 Hayles Street London SE11 4SU

36 Marlborough Close London SE17 3AP
 4 Marlborough Close London SE17 3AP
 22 Marlborough Close London SE17 3AP
 57 Hampton Street London SE17 3AN
 10 Marlborough Close London SE17 3AP
 55 Hampton Street London SE17 3AN
 51 Hampton Street London SE17 3AN
 53 Hampton Street London SE17 3AN
 12 Marlborough Close London SE17 3AP
 2 Marlborough Close London SE17 3AP
 20 Marlborough Close London SE17 3AP
 18 Marlborough Close London SE17 3AP
 14 Marlborough Close London SE17 3AP
 16 Marlborough Close London SE17 3AP
 11 Marlborough Close London SE17 3AW
 12 Winchester Close London SE17 3DH
 14 Winchester Close London SE17 3DH
 102 Winchester Close London SE17 3DH
 10 Winchester Close London SE17 3DH
 100 Winchester Close London SE17 3DH
 16 Winchester Close London SE17 3DH
 22 Winchester Close London SE17 3DH
 24 Winchester Close London SE17 3DH
 20 Winchester Close London SE17 3DH
 18 Winchester Close London SE17 3DH
 2 Winchester Close London SE17 3DH
 9 Marlborough Close London SE17 3AW
 19 Marlborough Close London SE17 3AW
 21 Marlborough Close London SE17 3AW
 17 Marlborough Close London SE17 3AW
 13 Marlborough Close London SE17 3AW
 15 Marlborough Close London SE17 3AW
 23 Marlborough Close London SE17 3AW
 5 Marlborough Close London SE17 3AW
 7 Marlborough Close London SE17 3AW
 3 Marlborough Close London SE17 3AW
 25 Marlborough Close London SE17 3AW
 27 Marlborough Close London SE17 3AW
 Flat 12 88 Walworth Road SE1 6SW
 Flat 13 88 Walworth Road SE1 6SW
 Flat 11 88 Walworth Road SE1 6SW
 Flat 1 88 Walworth Road SE1 6SW
 Flat 10 88 Walworth Road SE1 6SW
 Flat 14 88 Walworth Road SE1 6SW
 Flat 5 88 Walworth Road SE1 6SW
 Flat 6 88 Walworth Road SE1 6SW
 Flat 4 88 Walworth Road SE1 6SW
 Flat 2 88 Walworth Road SE1 6SW
 Flat 3 88 Walworth Road SE1 6SW
 Flat 7 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 8 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 6 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 4 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 5 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 9 Lucy Ashe House Newington Estate SE17 3DJ
 165a Brook Drive London SE11 4TG
 82 Walworth Road London SE1 6SW
 15 Hampton Street London SE17 3AN
 Hampton Court Palace 35 Hampton Street SE17 3AN
 20 Steedman Street London SE17 3AF
 Flat 7 88 Walworth Road SE1 6SW
 Flat C 12 Dante Road SE11 4RB
 Flat C 6 Dante Road SE11 4RB
 Flat C 10 Dante Road SE11 4RB
 Flat C 14 Dante Road SE11 4RB
 Flat C 8 Dante Road SE11 4RB
 Flat D 14 Dante Road SE11 4RB
 Flat D 6 Dante Road SE11 4RB
 Flat E 14 Dante Road SE11 4RB
 Flat D 12 Dante Road SE11 4RB
 Flat D 8 Dante Road SE11 4RB
 Flat D 10 Dante Road SE11 4RB
 Flat B 6 Dante Road SE11 4RB
 Flat A 12 Dante Road SE11 4RB

Apartment 505 1 St Gabriel'S Walk SE1 6FA
 Apartment 3104 1 St Gabriel Walk SE1 6FF
 3 Austral Street London SE11 4SJ

Apartment 2702 1 St Gabriel Walk SE1 6FB
 Apartment 2703 1 St Gabriel Walk SE1 6FB
 Apartment 2704 1 St Gabriel Walk SE1 6FB
 Apartment 2705 1 St Gabriel Walk SE1 6FB
 Apartment 2706 1 St Gabriel Walk SE1 6FB
 Apartment 2707 1 St Gabriel Walk SE1 6FB
 Apartment 2708 1 St Gabriel Walk SE1 6FB
 Apartment 2801 1 St Gabriel Walk SE1 6FB
 Apartment 2802 1 St Gabriel Walk SE1 6FB
 Apartment 2803 1 St Gabriel Walk SE1 6FB
 Apartment 2804 1 St Gabriel Walk SE1 6FB
 Apartment 2805 1 St Gabriel Walk SE1 6FB
 Apartment 2806 1 St Gabriel Walk SE1 6FB
 Apartment 2807 1 St Gabriel Walk SE1 6FB
 Apartment 2808 1 St Gabriel Walk SE1 6FB
 Apartment 2901 1 St Gabriel Walk SE1 6FB
 Apartment 2902 1 St Gabriel Walk SE1 6FB
 Apartment 2903 1 St Gabriel Walk SE1 6FB
 Apartment 2904 1 St Gabriel Walk SE1 6FB
 Apartment 2905 1 St Gabriel Walk SE1 6FB
 Apartment 3001 1 St Gabriel Walk SE1 6FB
 Apartment 3002 1 St Gabriel Walk SE1 6FB
 Apartment 3003 1 St Gabriel Walk SE1 6FB
 Apartment 3004 1 St Gabriel Walk SE1 6FB
 Apartment 3005 1 St Gabriel Walk SE1 6FB
 Apartment 3101 1 St Gabriel Walk SE1 6FB
 Apartment 3102 1 St Gabriel Walk SE1 6FB
 Apartment 3103 1 St Gabriel Walk SE1 6FB
 Apartment 3104 1 St Gabriel Walk SE1 6FB
 Apartment 3105 1 St Gabriel Walk SE1 6FB
 Apartment 3201 1 St Gabriel Walk SE1 6FB
 Apartment 3202 1 St Gabriel Walk SE1 6FB
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 Apartment 3501 1 St Gabriel Walk SE1 6FB
 Apartment 3502 1 St Gabriel Walk SE1 6FB
 Apartment 3601 1 St Gabriel Walk SE1 6FB
 Unit 1 22 Elephant And Castle SE1 6BH
 Unit 2 22 Elephant And Castle SE1 6BH
 Unit 3 22 Elephant And Castle SE1 6BH
 Unit 4 22 Elephant And Castle SE1 6BH
 86 Scylla Road SE15 3PB
 C/O E-Mail
 By E-Mail
 28 Sutherland Square London X
 Via Email x
 6 Cartwright House County Street SE1 6AN
 By E-Mail
 By E-Mail
 By E-Mail
 7 Orient Street London SE11 4SR
 158 Rowan Road Streatham SW16 5JQ
 15 Oswin Street London SE11 4TF
 158 Rowan Road London SW16 5JQ
 2 Wolsey Road Islington N1 4QH
 50 Cooper Close London SE1 7QU
 32 Benbow House 24 New Globe Walk SE1 9DS
 1 St Gabriel Walk, Apartment 2105 One The Elephant SE1 6FD
 Flat 2 3 - 5 Oswin Street SE11 4TF

Flat A 14 Dante Road SE11 4RB
 Flat A 10 Dante Road SE11 4RB
 Flat 8 88 Walworth Road SE1 6SW
 Flat 9 88 Walworth Road SE1 6SW
 Flat A 6 Dante Road SE11 4RB
 Flat B 12 Dante Road SE11 4RB
 Flat B 14 Dante Road SE11 4RB
 Flat B 10 Dante Road SE11 4RB
 Flat A 8 Dante Road SE11 4RB
 Flat B 8 Dante Road SE11 4RB
 Flat 3 Lucy Ashe House Newington Estate SE17 3DJ
 51 Winchester Close London SE17 3DQ
 53 Winchester Close London SE17 3DQ
 5 Winchester Close London SE17 3DQ
 47 Winchester Close London SE17 3DQ
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 37 Winchester Close London SE17 3DQ
 67 Winchester Close London SE17 3DQ
 Flat 14 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 15 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 13 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 11 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 12 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 16 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 2 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 20 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 19 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 17 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 18 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 10 Lucy Ashe House Newington Estate SE17 3DJ
 73 Winchester Close London SE17 3DQ
 75 Winchester Close London SE17 3DQ
 71 Winchester Close London SE17 3DQ
 69 Winchester Close London SE17 3DQ
 7 Winchester Close London SE17 3DQ
 77 Winchester Close London SE17 3DQ
 9 Winchester Close London SE17 3DQ
 Flat 1 Lucy Ashe House Newington Estate SE17 3DJ
 83 Winchester Close London SE17 3DQ
 79 Winchester Close London SE17 3DQ
 81 Winchester Close London SE17 3DQ
 Apartment 1108 8 Walworth Road SE1 6EG
 Apartment 1109 8 Walworth Road SE1 6EG
 Apartment 1107 8 Walworth Road SE1 6EG
 Apartment 1105 8 Walworth Road SE1 6EG
 Apartment 1106 8 Walworth Road SE1 6EG
 Apartment 1110 8 Walworth Road SE1 6EG
 Apartment 1203 8 Walworth Road SE1 6EG
 Apartment 1204 8 Walworth Road SE1 6EG
 Apartment 1202 8 Walworth Road SE1 6EG
 Apartment 1111 8 Walworth Road SE1 6EG
 Apartment 1201 8 Walworth Road SE1 6EG
 Apartment 1104 8 Walworth Road SE1 6EG
 Apartment 1006 8 Walworth Road SE1 6EE
 Apartment 1007 8 Walworth Road SE1 6EE
 Apartment 1005 8 Walworth Road SE1 6EE
 Apartment 1003 8 Walworth Road SE1 6EE
 10 Gaywood Street London SE1 6HG
 171 Brook Drive London SE11 4TG
 By Email
 B One The Elephant SE1 6FD
 Unit 203 By Email
 12b Gaywood Street London SE1 6hg
 59 Stephenson House Bath Terrace SE1 6PR
 15 Rankine House Bath Terrace SE1 6PL
 Elephant & Castle Traders Association
 103 Draper House 20 Elephant & Castle SE1 6SY
 13 Hayles Street Kennington SE11 4SU
 Conservation Areas Advisory Group For Southwark X
 5 Melford Court London SE1 3DX
 7 Alder Close Egham TW20 0LU
 19b Oswin Street London SE11 4TF
 1 St Gabriel Walk London SE1 6FB
 28 Martin House Falmouth Road SE1 6QP
 27 Oswin Street London SE11 4TF
 Flat 3 1 Arborfield Close SW2 3NX
 51 Great Marlborough Street London W1F 7JT
 The Water Tower London SE1 4RU
 5 St Gabriel Walk London SE1 6FS
 401 Tyler Court London SE17 1AX
 Apartment 29.05 1 St Gabriel Walk SE1 6FD
 Apt 28.07 1 St Gabriel Walk SE1 6FD
 Apartment 3305 1 St Gabriel Walk SE1 6FF
 Apt 1405 1 St Gabriel Walk SE1 6FB
 6 St Peter'S House Queens Row SE17 2PT
 23 Rankine House Bath Terrace SE1 6PL
 24 Brantwood House, Wyndham Estate London SE5 0XP
 Flat 17, Horton House Richborne Terrace SW8 1PT
 One The Elephant 1 St Gabriel Walk SE1 6FD
 One The Elephant 1 St Gabriel Walk SE1 6FD
 37 St Georges Avenue London N7 0HB
 29 Innis House East Street SE17 2JN
 18 Casino Avenue London SE24 9PH
 1 St Gabriel Walk London SE1 6FD
 26 West Square London SE11 4SP
 3 Waterhouse Square 138 Holborn EC1N 2SW
 81a Balfour Street London SE17 1PL
 39, West Square London SE11 4S
 42 Camberwell Grove London SE5 8RE
 Cinema Theatre Association X
 138 The Circle Queen Elizabeth Street SE1 2JJ
 2 Lily Mews London SE11 4FN
 Flat 3, 369 Clapham Road London SW9 9BT
 14 Marney Road London SW11 5EP
 64 Sandhurst Drive IG3 9DE
 27 Henshaw Street London SE17 1PE
 Flat 48 130 Webber Street SE1 0JN
 Flat 1 295 Camberwell New Road SE5 0TN
 63 East Dulwich Grove East Dulwich SE22 8PR
 27 Henshaw Street London SE17 1PE
 Flat 3 295a Walworth Road SE17 2TG
 By Email X
 58 Harpenden Road SE27 0AF
 51 Hatcham Park Rd London SE4 5QE
 By Email
 83 Aveling Park Road Walthamstow E17 4NS
 162 Brixton Road London SW90 6AU
 10b Turquand Street SE17 1LT
 51 Hatcham Park Road New Cross Gate SE14 5QE
 57 Mistral Sceaux Gardens Estate X
 359 Wendover Thurlow Street X
 Flat 50 Mistral SE5 7DS
 17a Charleston Street London SE17 1NG
 By Email
 19b Charleston Street London SE17 1NG
 116 Walworth Road London SE1 5SW
 9 Blanchdowne Denmark Hill SE5 8HT
 162 Caroline Gardens Asylum Road SE15 2SG
 11 Delawyk Crescent London SE24 9JB
 90 London Road Southbank Technopark SE1 6LN
 32b Larcom Street London SE17 1NQ

Apartment 1004 8 Walworth Road SE1 6EE
 Apartment 1008 8 Walworth Road SE1 6EE
 Apartment 1102 8 Walworth Road SE1 6EG
 Apartment 1103 8 Walworth Road SE1 6EG
 Apartment 1101 8 Walworth Road SE1 6EG
 Apartment 1009 8 Walworth Road SE1 6EE
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 Apartment 1205 8 Walworth Road SE1 6EG
 Apartment 1310 8 Walworth Road SE1 6EG
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 Apartment 801 8 Walworth Road SE1 6EE
 Apartment 709 8 Walworth Road SE1 6EE
 Apartment 710 8 Walworth Road SE1 6EE

137b Coldharbour Lane London SE5 9NU
 By Email
 9 Ingran Street Huntingdon PE29 3QG
 65 Corrance Road London SW2 5RD
 17 Brunlees House London SE1 6QF
 29b Palamos Road London E10 7JF
 By Email
 7 Woden Avenue CO3 0QY
 118 Buchan Road London SE15 3HG
 32 Marshall House Mintern Street N1 6TX
 131a Peckham Rye London SE15 3UL
 37 Chatsworth Estate Elderfield Road E5 0BA
 2 Lady Florence Courtyard Reginald Square SE8 4RU
 52 Graham Road London E7 1PB
 116 Glanville Road London SW2 5DF
 21 Overbury Road London N15 6RH
 73a Church Street London N16 0AY
 36 Mundania Road London SE22 0DZ
 12 Upland Road London SE22 0DL
 168 Walworth Road London SE17 3PS
 47a East Street London SE17 9VE
 Christmas Cottage Southstoke BA2 7DL
 The Cutting Room Unit 5 N4 1DN
 199 Eade Road London N4 1DN
 43 Larrence Avenue London NW7 4NL
 By Email
 44 Cleveland Street London W1T 4JT
 37a Charleston Street London SE17 1NG
 By Email
 52 Dunsmure Road London N16 5PP
 39 Hawstead Road London SE6 4JL
 84 Kitley Gardens London SE19 2RY
 60 Carlton Mansions Holmleigh Road N16 5PX
 45 Arrol House Rockingham Street SE1 6QL
 17a Charleston Street London SE17 1NG
 2 Emperor Court London CT1 2HZ
 Flat 50 Mistral SE5 7DS
 359 Wendover Thurlow Street SE17 2UR
 57 Mistral Sceaux Gardens Estate SE5 7DS
 10b Turquand Street London SE17 1LT
 51 Hatcham Park Road New Cross Gate SE14 5QE
 7 Grafton Mews London W1T 5HY
 No Address N4 1LZ
 102 Lymington Avenue London N22 6JG
 16 Brunlees House London SE1 6QF
 Barset Road London SE15 3HE
 No Address X
 3 Hathorne Close London SE15 2BY
 19 Buller Close London SE15 6UJ
 No Address X
 46a Riversdale Road London N5 2JT
 106c Camberwell Grove London SE5 8JH
 145 Kennington Park Road London SE11 4JJ
 81 Knoll Crescent HA6 1HH
 63a Grosvenor Park London SE5 0NJ
 18 Market Place, Blue Anchor Lane London SE16 3UQ
 31 Angelina House, Goldsmith Road Peckham SE15 5UB
 St Philip'S Vicarage, Avondale Square London SE1 5PD
 Flat 304 London SE17 3BA
 Priory House 25 St John'S Lane EC1M 4LB
 X
 Harfield Gardens London SE5 8DB
 30 Berryfield Rd London SE17 3QE
 35 Arrol House, Rockingham Street, London SE1 6QJ
 Flat 10 Cameron House London SE5 0UJ
 52 Surrey Square London SE17 2JX
 306 Omega Works London E3 2GZ
 Flat 7, Block J, Peabody Estate, Camberwell Green London SE5 7BW
 Flat 4, 7 John Maurice Close London SE17 1PY
 Flat 2 Bushey Hall, Bushey Hill Road London SE5 8QG
 Email X
 5 Glengall Terrace London X
 62 Centrepont London SE1 5NX

Apartment 804 8 Walworth Road SE1 6EE
 Apartment 808 8 Walworth Road SE1 6EE
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Apartment 805 8 Walworth Road SE1 6EE
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 Apartment 2005 8 Walworth Road SE1 6EH
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 Apartment 2007 8 Walworth Road SE1 6EH
 Apartment 2011 8 Walworth Road SE1 6EH
 Apartment 2101 8 Walworth Road SE1 6EH
 Apartment 2010 8 Walworth Road SE1 6EH
 Apartment 2008 8 Walworth Road SE1 6EH
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 Apartment 2001 8 Walworth Road SE1 6EH
 Apartment 1904 8 Walworth Road SE1 6EG
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 Apartment 1903 8 Walworth Road SE1 6EG
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Apartment 1906 8 Walworth Road SE1 6EG
 Apartment 1910 8 Walworth Road SE1 6EG
 Apartment 1911 8 Walworth Road SE1 6EG
 Apartment 1909 8 Walworth Road SE1 6EG
 Apartment 1907 8 Walworth Road SE1 6EG
 Apartment 1908 8 Walworth Road SE1 6EG
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 Apartment 1408 8 Walworth Road SE1 6EG
 Apartment 1501 8 Walworth Road SE1 6EG

3401 Styrata London SE1 6EJ
 30 West Square London SE11 4SP
 86 Scylla Road London SE15 3PB
 Flat 35, Ashton House, 53 Cottington Street, Flat 35 London SE11 4BN
 Apartment 10.04 1 St Gabriel Walk SE1 6FB
 The Theatres Trust 22 Charing Cross Road WC2H 0QL
 15 K Southwark Street London SE1 0TN
 Flat 81, Dorchester Court London SE24 9QY
 Apartment 16.06 1 St Gabriel Walk SE1 6FB
 Flat 2 97 Warour Street W1F 0UF
 T3601 1 St Gabriel Walk SE1 6FF
 1 Oswin Street London SE11 4TF
 130 Draper House 20 Elephant And Castle X
 7 Dauncey House Webber Row SE1 8QS
 152 Pomeroy Street London SE14 5BT
 1b St Faiths Road Flat 2 SE21 8JD
 433 Mile Oak Road Bn41 2rd BN4 12RD
 99b Forest Road London E8 3BH
 Equinox Southampton Way London SE5 7HQ
 Flat 1, 2 Jowett Street London SE15 6JN
 30 Cork Tree House London SE27 0QE
 126a Barry Road London SE22 0HP
 35 Mary Datchelor House, 2d Camberwell Grove London SE5 8FB
 13 Freemantle Street London SE17 2JP
 603 Blackwood Apartments London SE17 1AQ
 126a Barry Road London SE22 0HP
 40 Grosvenor Terrace London SE5 0NP
 7 Fresco House London SE5 7FR
 90 Crofton Road London SE5 8NA
 138b Roding Road London E5 0DS
 76 Shenley Road, Camberwell Green London SE5 8NQ
 8 Blue Lion Place London SE1 4PU
 18 Azalea House New Cross SE14 6BA
 92a Palace Road London SW2 3JZ
 Tytherly, Perrymead Bath BA2 5AX
 34 Huberd House Manciple Street London SE1 4DN
 Flat 3 Culand House Congreve Street SE17 1ST
 78-82 Nightingale Grove London SE13 6DZ
 Hanover Park House 14-16 Hanover Park SE15 5HG
 80 Arodene Road SW2 2BH
 2 Falcon Point, Hopton Street London SE1 9JW
 By Email X
 Flat 60 Dawes House, Orb Street London SE17 1RD
 81 Arnold Estate London SE1 2DX
 28 Dover Flats London SE1 5NJ
 6 Sister Mabel'S Way London SE15 6UL
 36 Columbia Point London SE16 7BE
 25 Fielding Street London SE17 3HE
 70 Aylesbury Road London SE17 2EH
 3 Portland Street London SE17 2PF
 4 St John'S Court Devizes SN10 1BU
 47 Aylesbury Road London SE17 2EQ
 68 Swan Mead London SE1 4SX
 Great Dover Street London SE1 4LB
 Flat 1 Restormel House Kennington SE11 4UU
 160 Crampton St London SE17 3AE
 29 Ravensdon St London SE11 4AQ
 16a Charleston Street London SE17 1NF
 16 Addington Sq London SE5 7JZ
 Flat 40 Douglas Buildings London SE1 1EJ
 165 John Ruskin Street London SE5 0PQ
 247a Walworth Road London SE17 1RL
 45 Tennyson House, Browning Street London X
 52 Arrol House Rockingham Street London SE1 6QL
 17 Melbway House. 18 Meadow Row London SE1 6BF
 10 Perronet House, Princess Street London SE1 6JR
 23 Fielding Street London SE17 3HE
 241 Camberwell New Rd, Top Flat London SE5 0TH
 38, Perronet House Princess Street London SE1 6JR
 Email X
 219 Elephant And Castle Shopping Centre London SE1 6TE
 50 Sutherland Square London SE17 3EE

Apartment 1505 8 Walworth Road SE1 6EG
 Apartment 1506 8 Walworth Road SE1 6EG
 Apartment 1504 8 Walworth Road SE1 6EG
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 Apartment 1802 8 Walworth Road SE1 6EG
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Apartment 1705 8 Walworth Road SE1 6EG
 Apartment 1706 8 Walworth Road SE1 6EG
 1 Hampton Street London SE17 3AL
 6 Steedman Street London SE17 3AF
 Large Arch 3 Hampton Street SE17 3AL
 92a Walworth Road London SE1 6SW
 Parking Bays 9 6 Steedman Street SE17 3AF
 Parking Bays 2 6 Steedman Street SE17 3AF
 4 Steedman Street London SE17 3AF
 504 Julian Markham House 114 Walworth Road SE17 1JL
 505 Julian Markham House 114 Walworth Road SE17 1JL
 503 Julian Markham House 114 Walworth Road SE17 1JL
 607 Julian Markham House 114 Walworth Road SE17 1JL
 502 Julian Markham House 114 Walworth Road SE17 1JL
 506 Julian Markham House 114 Walworth Road SE17 1JL
 703 Julian Markham House 114 Walworth Road SE17 1JL
 704 Julian Markham House 114 Walworth Road SE17 1JL
 702 Julian Markham House 114 Walworth Road SE17 1JL
 507 Julian Markham House 114 Walworth Road SE17 1JL
 701 Julian Markham House 114 Walworth Road SE17 1JL
 606 Julian Markham House 114 Walworth Road SE17 1JL
 104-124 Newington Butts London SE11 4QU
 101 Winchester Close London SE17 3DH
 Ground Floor Flat 177 Brook Drive SE11 4TG
 6 Hampton Street London SE1 6SN
 604 Julian Markham House 114 Walworth Road SE17 1JL
 605 Julian Markham House 114 Walworth Road SE17 1JL
 603 Julian Markham House 114 Walworth Road SE17 1JL
 601 Julian Markham House 114 Walworth Road SE17 1JL
 602 Julian Markham House 114 Walworth Road SE17 1JL
 Managers Flat Hampton Court Palace SE1 6SN
 12 Wollaston Close Hampton Street SE1 6SL
 13 Wollaston Close Hampton Street SE1 6SL
 11 Wollaston Close Hampton Street SE1 6SL
 9 Wollaston Close Hampton Street SE1 6SL
 10 Wollaston Close Hampton Street SE1 6SL
 14 Wollaston Close Hampton Street SE1 6SL
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 17 Wollaston Close Hampton Street SE1 6SL
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 16 Wollaston Close Hampton Street SE1 6SL
 8 Wollaston Close Hampton Street SE1 6SL
 Store Wollaston Close SE1 6SL
 1 Wollaston Close Hampton Street SE1 6SL
 17-19 Elephant And Castle London SE1 6TH

116 Camberwell New Road London SE5 0RS
 87 Balfour Street London SE17 1PB
 Flat 52 London E2 6PG
 82b Peckham Hill Street, Peckham London SE15 5JT
 Flat 14 1 Oswin Street SE11 4TF
 77-85 Newington Causeway London SE1 6BD
 22-27 The Oval London E2 9DT
 25 Cobourg Rd London SE5 0HT
 5 Colnbrook Street London SE1 6EZ
 145 Kennington Park Road London SE11 4JJ
 C/O Shopping Centre Elephant And Castle SE1
 138 Lancaster Road, First Floor Flat London W11 1QU
 26 Feltham Road London CR4 2JQ
 23 Gladstone Street London SE1 6EY
 39 Brecon Close London CR4 1XB
 8 Oakley Place London SE1 5AD
 160 Tooley Street London SE1 2TZ
 34 Oleander House 1b Glengall Road SE15 6FS
 163, Merrow St Walworth SE17 2NY
 10b Brabourn Grove London SE15 2BS
 71 Oxley Close London SE1 5HF
 3 Hurley Crescent London SE16 6AL
 Flat 4, 7 John Maurice Close London SE17 1PY
 2 Cambridge Terrace Otley LS21 1JS
 Flat 13 117 Lewisham Way London SE14 6QJ
 56 Bonnington Square, 1st Floor Flat London SW8 1TQ
 Flat K/35, Du Cane Court, Balham High Road London SW17 7JY
 7 Loder Street London SE15 2LF
 25 East Surrey Grove London SE15 6EX
 185a Friern Road London SE22 0BD
 Southwark Council SE1 2QH
 By E-Mail
 13 Epping House, Charnwood Street London
 Flat A 165 Camberwell Road SE5 0HB
 34 Chesterfield Grove London SE22 8RW
 128 Benhill Road London SE5 7LZ
 143a Camberwell New Road London SE5 0SU
 74 Latimer, Beaconsfield Road London SE17 2EW
 Flat 1, 3 Lennox Rd London SW9 7BF
 54c Granville Park London SE13 7DX
 12 Malpas Road London SE4 1BS
 8 Priestley House, Old Street London EC1V 9JN
 2 Bruno Court London e8 1bf
 Flat 106 Denmark Hill London SE5 8RX
 96 Leveson Street London SW16 6DE
 Flat 6, 137 Trafalgar St Southwark SE17 2TP
 8b Hales Street London SE8 4RB
 36 Queen'S Row London SE17 2PX
 57 Greyhound Road London NW10 5QH
 33 Ivydale Road London SE15 3DR
 76 Shenley Road London SE5 8NQ
 34 Pullens Buildings Peacock Street London SE17 3LF
 40 Acton Lane London X
 44 Bushey Hill Rd London SE5 8QJ
 28 Merryweather Court, 19 Rodney Road New Malden KT3 5TD
 6 Sister Mabela'S Way London SE15 6UL
 16b Eastlake Road London SE5 9QL
 91 Rodney Road London SE17 1RF
 20 Brook Drive London SE11 4TT
 191a Crowborough Road Tooting SW17 9QE
 44 Beck Road London E8 4RE
 20 Lansdowne Drive London E8 3EG
 104a Carter Street London SE17 3EW
 116 Thurlow Street, London London SE17 2UE
 18 Falstaff House London N1 6PP
 Flat 6, 137 Trafalgar St London SE17 2TP
 39 Calderon Road London E11 4ET
 51 Leathermarket Court London SE1 3HS
 Sophia Road London E10 5AX
 Flat 1, 144 Croxted Road London SE21 8NR
 35 Buckland Court London N1 5JJ
 1 Gorefield House,, Canterbury Road, London NW6 5TA
 112 Camberwell Grove London SE5 8RQ

16 Elephant And Castle London SE1 6TH
 16a Newington Butts London SE1 6SF
 2 Wollaston Close Hampton Street SE1 6SL
 6 Wollaston Close Hampton Street SE1 6SL
 7 Wollaston Close Hampton Street SE1 6SL
 5 Wollaston Close Hampton Street SE1 6SL
 3 Wollaston Close Hampton Street SE1 6SL
 4 Wollaston Close Hampton Street SE1 6SL
 20 Wollaston Close Hampton Street SE1 6SL
 Flat A 12 Marlborough Close SE17 3AP
 Railway Arch 143 Eagle Yard SE1 6SW
 33 Wollaston Close Hampton Street SE1 6SL
 Flat 1 Draper House SE1 6SX
 Third Floor Flat 6 Hampton Street SE1 6SN
 32 Wollaston Close Hampton Street SE1 6SL
 24 Wollaston Close Hampton Street SE1 6SL
 25 Wollaston Close Hampton Street SE1 6SL
 23 Wollaston Close Hampton Street SE1 6SL
 21 Wollaston Close Hampton Street SE1 6SL
 22 Wollaston Close Hampton Street SE1 6SL
 26 Wollaston Close Hampton Street SE1 6SL

 30 Wollaston Close Hampton Street SE1 6SL
 31 Wollaston Close Hampton Street SE1 6SL
 29 Wollaston Close Hampton Street SE1 6SL
 27 Wollaston Close Hampton Street SE1 6SL
 28 Wollaston Close Hampton Street SE1 6SL
 Apartment 203 8 Walworth Road SE1 6EE
 Apartment 204 8 Walworth Road SE1 6EE
 Apartment 202 8 Walworth Road SE1 6EE
 Apartment 201 8 Walworth Road SE1 6EE
 Apartment 205 8 Walworth Road SE1 6EE
 Apartment 209 8 Walworth Road SE1 6EE
 Apartment 210 8 Walworth Road SE1 6EE
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 Apartment 206 8 Walworth Road SE1 6EE
 Apartment 207 8 Walworth Road SE1 6EE
 Apartment 303 2 Walworth Road SE1 6EB
 Apartment 101 2 Walworth Road SE1 6EB
 Apartment 102 2 Walworth Road SE1 6EB
 Studio 16 86 Walworth Road SE1 6SW
 Newington Tenants Hall 77 Canterbury Place SE17 3AD
 Mess Hall 77 Canterbury Place SE17 3AD
 Apartment 103 2 Walworth Road SE1 6EB
 Apartment 301 2 Walworth Road SE1 6EB
 Apartment 302 2 Walworth Road SE1 6EB
 Apartment 203 2 Walworth Road SE1 6EB
 Apartment 201 2 Walworth Road SE1 6EB
 Apartment 202 2 Walworth Road SE1 6EB
 Apartment 301 8 Walworth Road SE1 6EE
 Apartment 407 8 Walworth Road SE1 6EE
 Apartment 408 8 Walworth Road SE1 6EE
 Apartment 406 8 Walworth Road SE1 6EE
 Apartment 404 8 Walworth Road SE1 6EE
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 Apartment 409 8 Walworth Road SE1 6EE
 Apartment 503 8 Walworth Road SE1 6EE
 Apartment 504 8 Walworth Road SE1 6EE
 Apartment 502 8 Walworth Road SE1 6EE
 Apartment 410 8 Walworth Road SE1 6EE
 Apartment 501 8 Walworth Road SE1 6EE
 Apartment 403 8 Walworth Road SE1 6EE
 Apartment 305 8 Walworth Road SE1 6EE
 Apartment 306 8 Walworth Road SE1 6EE
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 Apartment 303 8 Walworth Road SE1 6EE
 Apartment 307 8 Walworth Road SE1 6EE
 Apartment 401 8 Walworth Road SE1 6EE
 Apartment 402 8 Walworth Road SE1 6EE
 Apartment 310 8 Walworth Road SE1 6EE
 Apartment 308 8 Walworth Road SE1 6EE
 Apartment 309 8 Walworth Road SE1 6EE
 100 Walworth Road London SE17 1JL

 13 Framlingham Close London E5 9PR
 330a Brockley Road London Se4 2bt
 52 St Asaph Road London SE4 2EJ
 159b Clarence Road London E5 8EE
 25 Howbury Road London SE15 3HH
 160 Copleston Road London SE22 0NW
 17 Lyndhurst Grove London SE15 5AN
 44b London SE5 0NP
 47a Trafalgar Avenue London SE15 6NP
 All Hallows Church, 10 Copperfield Street London SE1 0EP
 384a New Cross Road London SE14 6AG
 146c Lordship Lane, East Dulwich London SE22 8HD
 8 Colnbrook Street London SE1 6EZ
 Flat 405 South City Court 52 Peckham Grove SE15 6AW
 147 Langham Road London N15 3LP
 13 Framlingham Close London E5 9PR
 32 Shaftesbury Court London Se5 8hq
 17 Levehurst House London SE27 0HA
 First Floor Flat, 2 Alpha Road London SE14 6TZ
 Flat 8, 53 Honor Oak Road London SE23 3SH
 Flat 15, Grenier Apartments, 18 Gervase Street London SE15 2RS
 33 Killyon Road London SW8 2XS
 22 Amersham Grove London SE146LH
 16a Rosedene Avenue, Thurmaston Leicester LE4 8HR
 176 Ladywell Road London SE13 7HU
 3 Tooley Street London SE1 2TA
 187-205 Pentonville Road London N1 9NF
 222 Croxted Road London Se24 9dg
 36 Crewdson Road London SW9 0LJ
 3 Baillie House, Horsley Road London SE17 2AT
 42 St. Johns Vale London SE8 4EN
 10 Scholes Rise Sheffield S359UQ
 18 5 Fountayne Rd London N15 4QL
 135 Sunnymead Avenue Gillingham Me7 2eb
 52 Ossory Road London SE1 5AN
 23 Graces Mews London SE5 8JF
 159 Girdlestone Walk London N195DW
 99 Astbury Road London SE15 2NP
 28 Avenue Rd Stoke-On-Trent ST4 2dt
 Flat 88 Joseph House, Amhurst Park London N16 5AH
 64 Clarence Gate Gardens, Glentworth Street London NW1 6QR
 38 Blenheim Rise London N15 4TJ
 3 Reachview Close London NW1 0TY
 34 Oulton Road London N15 5PY
 Flat 17, Stephenson House, Bath Terrace London SE1 6PP
 96 Crampton St London E8 3RL
 146 Milligan Street London E14 8AS
 32b Larcom Street London SE17 1NQ
 41 Dace Road London
 63d Overhill Road London SE22 0pq
 208a Mare Street London E8 3RD
 44, 9 Evan Cook Close London SE152HL
 9 Birley Rise Sheffield S6 1hq
 18 Eddystone Road London Se42de
 13 Eccleston Street London Sw1w 9lx
 49 Addington Square London SE5 7LB
 155 Queen'S Road London SE15 2ND
 39 Poplar Road London SE24 0BN
 20 Vantrey House, Marylee Way London SE11 6TY
 18 Casino Avenue London SE24 9PH
 373b Walworth Road London SE17 2al
 2 Penshurst Rd London E9 7DX
 238 Drakefell Road London SE4 2DR
 63d Overhill Road London SE22 0PQ
 34b Merton Road London E17 9de
 29 Loddiges House, Loddiges Road London E9 7PJ
 30 Bisson Road Stratford, London E15 2RD
 22b Muschamp Road London SE15 4EF
 Flat 4, Suffolk House, Rushcroft Road London SW2 1LF
 8 Harold Estate London SE1 4HN
 131 Kennington Park Rd London SE11 4JJ
 Flat 26 Rokeby House Balham SW128PX
 13 Black Prince Road Se11 6bz SE11 6BZ

406 Julian Markham House 114 Walworth Road SE17 1JL
 407 Julian Markham House 114 Walworth Road SE17 1JL
 405 Julian Markham House 114 Walworth Road SE17 1JL
 403 Julian Markham House 114 Walworth Road SE17 1JL
 404 Julian Markham House 114 Walworth Road SE17 1JL
 101 Julian Markham House 114 Walworth Road SE17 1JL
 105 Julian Markham House 114 Walworth Road SE17 1JL
 106 Julian Markham House 114 Walworth Road SE17 1JL
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 102 Julian Markham House 114 Walworth Road SE17 1JL
 103 Julian Markham House 114 Walworth Road SE17 1JL
 402 Julian Markham House 114 Walworth Road SE17 1JL
 708 Julian Markham House 114 Walworth Road SE17 1JL
 205 Julian Markham House 114 Walworth Road SE17 1JL
 707 Julian Markham House 114 Walworth Road SE17 1JL
 705 Julian Markham House 114 Walworth Road SE17 1JL
 706 Julian Markham House 114 Walworth Road SE17 1JL
 501 Julian Markham House 114 Walworth Road SE17 1JL
 307 Julian Markham House 114 Walworth Road SE17 1JL
 Second Floor Flat 6 Hampton Street SE1 6SN
 Arch 1 3 Hampton Street SE17 3AL
 First Floor And Second Floor Flat 191 Brook Drive SE11 4TG
 107 Julian Markham House 114 Walworth Road SE17 1JL
 Third Floor Flat 84 Walworth Road SE1 6SW
 Ground Floor Flat 191 Brook Drive SE11 4TG
 Second Floor Flat 84 Walworth Road SE1 6SW
 First Floor Flat 84 Walworth Road SE1 6SW
 Flat 1 187 Brook Drive SE11 4TG
 First Floor Flat 177 Brook Drive SE11 4TG
 Second Floor Flat 177 Brook Drive SE11 4TG
 Flat 4 187 Brook Drive SE11 4TG
 Flat 2 187 Brook Drive SE11 4TG
 Flat 3 187 Brook Drive SE11 4TG
 306 Julian Markham House 114 Walworth Road SE17 1JL
 204 Julian Markham House 114 Walworth Road SE17 1JL
 206 Julian Markham House 114 Walworth Road SE17 1JL
 203 Julian Markham House 114 Walworth Road SE17 1JL
 201 Julian Markham House 114 Walworth Road SE17 1JL
 202 Julian Markham House 114 Walworth Road SE17 1JL
 207 Julian Markham House 114 Walworth Road SE17 1JL
 304 Julian Markham House 114 Walworth Road SE17 1JL
 305 Julian Markham House 114 Walworth Road SE17 1JL
 303 Julian Markham House 114 Walworth Road SE17 1JL
 301 Julian Markham House 114 Walworth Road SE17 1JL
 302 Julian Markham House 114 Walworth Road SE17 1JL
 Apartment 2304 8 Walworth Road SE1 6EH
 Flat 104 Highline Building SE17 3AF
 Flat 105 Highline Building SE17 3AF
 Flat 103 Highline Building SE17 3AF
 Flat 101 Highline Building SE17 3AF
 Flat 102 Highline Building SE17 3AF
 Flat 106 Highline Building SE17 3AF
 Flat 203 Highline Building SE17 3AF
 Flat 204 Highline Building SE17 3AF
 Flat 202 Highline Building SE17 3AF
 Flat 107 Highline Building SE17 3AF
 Flat 201 Highline Building SE17 3AF
 Arch 152 10 Steedman Street SE17 3AF

 Arch 149 Eagle Yard SE1 6SP
 Arch 150 Eagle Yard SE1 6SP
 Arch 148 Eagle Yard SE1 6SP
 Arch 146 Eagle Yard SE1 6SP
 Arch 147 Eagle Yard SE1 6SP
 Arch 150 10 Steedman Street SE17 3AF
 Arch 151 10 Steedman Street SE17 3AF
 Unit 1 Arch 146 Eagle Yard SE1 6SP
 16a Elephant And Castle London SE1 6TH
 Flat 301 Highline Building SE17 3AF
 Flat 702 Highline Building SE17 3AF
 Flat 703 Highline Building SE17 3AF
 Flat 701 Highline Building SE17 3AF
 Flat 501 Highline Building SE17 3AF
 Flat 504 Highline Building SE17 3AF

 8 Dekker House Elmington Estate SE5 7QR
 10 Muirfield, Redhouse Swindon SN252DD
 Thorney Creek House, Herschel Road Cambridge CB3 9AU
 Ballards Lane London N3 2bu
 10 Steedman Street London SE17 3AF
 18 Elm Park Road London SE25 6UA
 69a Friary Road London SE15 1QS
 Flat 16-18 Wentworth Mansions, Keats Grove London NW3 2RL
 173b Leighton Road London NW5 2RD
 49a Brook Drive London Se11 4tu
 78 Brownhill Road London se6 2ew
 186a Deptford High Street London SE8 3PR
 94 Fairfoot Road London E3 4EH
 146c Southwark Bridge Road London SE1 0DG
 146c Southwark Bridge Road London SE1 0DG
 2 Martyr Close St Albans AL12LL
 118 Rochdale Road, Abbey Wood London SE20XB
 8 Anderton Close London SE5 8BU
 62 Battersea Park Road London SW11 4JP
 Auckland Street London SE11 5AB
 78 Barrow Road London SW16 5PG
 87b Wyndham Road Camberwell SE5 0UB
 15a New Church Road London SE5 7JH
 Southbank London SE1 4JQ
 88 Sewardstone Road London E2 9JG
 21 Huguenot Sq London SE15 3NN
 97 Bravington Road London X
 41 Sharsted Street London SE17 3TP
 73 Trinity Square Margate CT9 1HS
 12 Whitgift House London SE11 6AG
 9 Choumert Square London SE15 4RE
 82 Balls Pond Road, Flat 1 London N1 4AJ
 57 Mornington Street London NW1 7QA
 70 Ratray Road London SW2 1BE
 169 Upland Rd London SE22 0DF
 63a Grosvenor Park London se5 0nj
 8a Morning Lane London X
 10c Overbury Road London N15 6RH
 211 Norwood Rd London SE24 9AG
 65-69, County Street London SE1 4AD
 182c Lewisham Way London SE4 1UU
 62 Midmoor Road London SW12 0ET
 5 Priory Road Bridgnorth Wv15 5ej
 15 Aylesbury Road London SE17 2EQ
 148a Jerningham Road London SE14 5NL
 32 Lanbury Road London SE15 3DB
 65 Swaton London E3 4ES
 Mornington Centre, Stanley Street London SE8 4BL
 70 Osier Crescent London N10 1QX
 14 Victoria Road Top Flat
 95 Effingham Road London
 1a Brownswood Road London N4 2HP
 6 Liffé Street London SE17 3LJ
 37 London SE17 2EH
 59 Lyndhurst Grove London SE15 5AW
 4 Umbria Street, Roehampton London SW15 5DP
 Haberdasher Estate London
 118 Embleton Road, Ladywell, Lewisham Lewisham, London
 SE13 7DG
 29 Camberwell Grove London SE5 8JA
 21 Lyndhurst Way Peckham SE15 5AG
 12 Hind Grove London E14 6HU
 18 Westwick Gardens London W14 0BU
 Ucl 14 Upper Woburn Place London WC1H 0NN
 15 Asylum Rd London SE15 4HZ
 Flat 6 Gillray House London SW10 0BT
 9 Crewys Road Peckham SE152BJ
 30 Lewisham Road London SE13 7QR
 Flat 62, Hayles Buildings, Elliotts Row London SE11 4TD
 2 Walsingham Road Mitcham CR4 4LN
 2 Frederick Charrington House London e1 5qw
 12a Upper Hamilton Road Brighton BN1 5DF
 9a Musgrove Road London SE14 5PP
 12 Leary House London SE11 5LH

Flat 704 Highline Building SE17 3AF
 Studio 2 Highline Building SE17 3AF
 Studio 3 Highline Building SE17 3AF
 Studio 1 Highline Building SE17 3AF
 Flat 801 Highline Building SE17 3AF
 Flat 802 Highline Building SE17 3AF
 Flat 604 Highline Building SE17 3AF
 Flat 402 Highline Building SE17 3AF

Flat 403 Highline Building SE17 3AF
 Flat 304 Highline Building SE17 3AF
 Flat 302 Highline Building SE17 3AF
 Flat 303 Highline Building SE17 3AF
 Flat 404 Highline Building SE17 3AF
 Flat 602 Highline Building SE17 3AF
 Flat 603 Highline Building SE17 3AF
 Flat 601 Highline Building SE17 3AF
 Flat 502 Highline Building SE17 3AF
 Flat 503 Highline Building SE17 3AF
 Arch 145 Eagle Yard SE1 6SP
 Unit 1 Draper House SE1 6SX
 Unit 2 Draper House SE1 6SX
 Flat 1 189 Brook Drive SE11 4TG
 Flat 2 189 Brook Drive SE11 4TG
 Management Office 8 Walworth Road SE1 6EE
 Studio 2 86 Walworth Road SE1 6SW
 Unit 3 Draper House SE1 6SX
 Unit 7 91-95 Newington Butts SE1 6SF
 Unit 8 91-95 Newington Butts SE1 6SF
 Unit 6 91-95 Newington Butts SE1 6SF
 Unit 4 91-95 Newington Butts SE1 6SF
 Unit 5 91-95 Newington Butts SE1 6SF
 Unit 9 91-95 Newington Butts SE1 6SF
 Arch 142 Eagle Yard SE1 6SP
 Arch 143 Eagle Yard SE1 6SP
 Arch 141 Eagle Yard SE1 6SP
 Unit 10 91-95 Newington Butts SE1 6SF
 Arch 140 Eagle Yard SE1 6SP
 Unit 3 91-95 Newington Butts SE1 6SF
 First Floor Flat 4 Hampton Street SE1 6SN
 Second Floor Flat 4 Hampton Street SE1 6SN
 Unit 6 Draper House SE1 6SX
 Unit 4 Draper House SE1 6SX
 Unit 5 Draper House SE1 6SX
 Unit 1 91-95 Newington Butts SE1 6SF
 Unit 2 91-95 Newington Butts SE1 6SF
 47 Dante Road London SE11 4RB
 Site Huts 20 Steedman Street SE17 3AF
 Apartment 707 1 St Gabriel Walk SE1 6FA

Apartment 708 1 St Gabriel Walk SE1 6FA
 Apartment 706 1 St Gabriel Walk SE1 6FA
 Apartment 704 1 St Gabriel Walk SE1 6FA
 Apartment 705 1 St Gabriel Walk SE1 6FA
 Apartment 801 1 St Gabriel Walk SE1 6FA
 Apartment 805 1 St Gabriel Walk SE1 6FA
 Apartment 806 1 St Gabriel Walk SE1 6FA
 Apartment 804 1 St Gabriel Walk SE1 6FA
 Apartment 802 1 St Gabriel Walk SE1 6FA
 Apartment 803 1 St Gabriel Walk SE1 6FA
 Apartment 703 1 St Gabriel Walk SE1 6FA
 Apartment 603 1 St Gabriel Walk SE1 6FA
 Apartment 604 1 St Gabriel Walk SE1 6FA
 Apartment 602 1 St Gabriel Walk SE1 6FA
 Apartment 508 1 St Gabriel Walk SE1 6FA
 Apartment 601 1 St Gabriel Walk SE1 6FA
 Apartment 605 1 St Gabriel Walk SE1 6FA
 Apartment 701 1 St Gabriel Walk SE1 6FA
 Apartment 702 1 St Gabriel Walk SE1 6FA
 Apartment 608 1 St Gabriel Walk SE1 6FA
 Apartment 606 1 St Gabriel Walk SE1 6FA
 Apartment 607 1 St Gabriel Walk SE1 6FA
 Apartment 807 1 St Gabriel Walk SE1 6FA
 Apartment 1007 1 St Gabriel Walk SE1 6FB

26 Chester Court London SE5 7HS
 93 Old Ford Rd London E2 9JR
 123 Landcroft Road London SE22 9jp
 32 Wareham House London SW8 1az
 Flat 1, 309 Camberwell Road London SE5 0H1
 22 Burgos Grove London SE10 8LL
 15 Alberta Street London SE17 3SF
 49 Jerrard Court, Pages Close, Sutton Coldfield Birmingham B757SZ
 94 New Cross Road London SE14 5BA
 8-16 Pocock Street London SE1 0BW
 2 Hill Farm Cottage Sudbury CO10 0QH
 31 Briarhill Suffolk IP30 9SD
 78 Glazebrook Close London SE21 8RR
 20 Fielding St London SE17 3HD
 22 Hatchard Road London N22 4NH
 28 Saltwood Grove London SE17 2HL

Flat 2, 46d Bird In Bush Rd Peckham SE15 6RW
 6 Whitehall Gardens, Chiswick London W4 3LT
 36a Larcom St London SE17 1NQ
 156 Taplow Thrurlow St. London SE17 2UJ
 43 Wigglesworth Street London SE14 5EG
 3 Gladstone St. London. SE1 6EY
 26 Waterloo Road Kings Heath Birmingham B14 7SD
 44 Smeaton Court 50 Rockingham Street SE1 6PF
 107a Copleston Road London SE15 4AQ
 144 Caroline Gardens, Asylum Road London SE15 2SG
 24 Leconfield House London SE5 8AY
 18 Dunstons Road London SE22 0HQ
 56 Frankfurt Road Herne Hill SE24 9NY
 33 Consort Road London SE15 2PH
 79 Beauval Road London SE22 8UH
 Flat 410, Strata Se1 8 Walworth Road SE1 6EE
 35 Innis House East Street SE17 2JN
 Flat 1, 92 Landcroft Road East Dulwich SE22 9JT
 65b Camberwell Road London SE5 0EZ
 Top Flat, 111 Upper Brockley Road London SE4 1TF
 10 Bradley Green Aldermoor SO16 5HZ
 Flat 14 102 Westminster Bridge Road SE1 7XT
 36b Amott Road London SE15 4JD
 2 Oyster Court 85 Crampton Street se173bw
 54 Ruskin Park House London Se58tq
 27 Hogan Court 57 Edmund Street SE5 7NF
 20 Paxton House Walworth SE17 1DS
 17 Brabourn Grove London SE15 2BS
 5 Quedgeley Court London SE15 6BD
 46 Comber House Comber Grove SE5 0LJ
 Flat 6 Petworth House East Dulwich Estate, Pytchley Road SE22 8DD
 Flat 303 International House 1-5 Lambeth Road SE1 7DQ
 56 Linnell Rd. Camberwell SE5 8NJ
 165a Camberwell Road London SE5 0HB
 Flat 8 Woods Place London SE1 3BS
 92 Stanswood Gardens London SE5 7SR
 18 Dunnico House East Street SE17 2JL
 3 Kemp Court, Hartington Rd. London SW8 2BJ
 Flat 3, Collingwood House 3, Cottage Green SE5 7ST
 16 Abbey Terrace London SE2 9EY
 29 Silwood Road Sunningdale SL5 0PY
 152 Crampton Street London SE17 3AE
 Flat 2 Alexandra Court 45a Urlwin Street SE5 0AB
 47c Camden Hill Road London SE19 1NX
 23 Millpond Estate West Lane SE16 4LZ
 119 Casino Avenue Herne Hill SE24 9PP
 Flat 104, Rowland Hill House Nelson Square SE1 0LU
 Flat 2, Burwash House Kipling Estate SE1 3RW
 87 Calton Avenue London SE21 7DF
 Ivydale Rd London SE15 3DZ
 101 Upland Road London SE22 0DB
 57 Holmdene Avenue London SE24 9LD
 Flat 25 Bridgehouse Court 109-115 Blackfriars Road SE1 8HW
 97 Coleman Road London SE5 7TF
 26 Homeleigh Road London se15 3ee

Apartment 1008 1 St Gabriel Walk SE1 6FB
 Apartment 1006 1 St Gabriel Walk SE1 6FB
 Apartment 1004 1 St Gabriel Walk SE1 6FB
 Apartment 1005 1 St Gabriel Walk SE1 6FB
 Apartment 1101 1 St Gabriel Walk SE1 6FB
 Apartment 1105 1 St Gabriel Walk SE1 6FB
 Apartment 1106 1 St Gabriel Walk SE1 6FB
 Apartment 1104 1 St Gabriel Walk SE1 6FB
 Apartment 1102 1 St Gabriel Walk SE1 6FB
 Apartment 1103 1 St Gabriel Walk SE1 6FB
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 Apartment 903 1 St Gabriel Walk SE1 6FA
 Apartment 904 1 St Gabriel Walk SE1 6FA
 Apartment 902 1 St Gabriel Walk SE1 6FA
 Apartment 808 1 St Gabriel Walk SE1 6FA
 Apartment 901 1 St Gabriel Walk SE1 6FA
 Apartment 905 1 St Gabriel Walk SE1 6FA
 Apartment 1001 1 St Gabriel Walk SE1 6FB
 Apartment 1002 1 St Gabriel Walk SE1 6FB
 Apartment 908 1 St Gabriel Walk SE1 6FB
 Apartment 906 1 St Gabriel Walk SE1 6FA
 Apartment 907 1 St Gabriel Walk SE1 6FA
 Apartment 507 1 St Gabriel Walk SE1 6FA
 Apartment 103 1 St Gabriel Walk SE1 6FA
 Apartment 104 1 St Gabriel Walk SE1 6FA
 Apartment 102 1 St Gabriel Walk SE1 6FA
 1 St Gabriel Walk London SE1 6FB
 Apartment 101 1 St Gabriel Walk SE1 6FA
 Apartment 105 1 St Gabriel Walk SE1 6FA
 Apartment 204 1 St Gabriel Walk SE1 6FA
 Apartment 205 1 St Gabriel Walk SE1 6FA
 Apartment 203 1 St Gabriel Walk SE1 6FA
 Apartment 201 1 St Gabriel Walk SE1 6FA
 Apartment 202 1 St Gabriel Walk SE1 6FA
 Castle Centre 2 St Gabriel Walk SE1 6FG
 16 Steedman Street London SE17 3AF
 1 Randall Court 14 Steedman Street SE17 3AF
 Randall Court 14 Steedman Street SE17 3AF
 7 Hampton Street London SE17 3AF

 12 Steedman Street London SE17 3AF
 2 Randall Court 14 Steedman Street SE17 3AF
 6 Randall Court 14 Steedman Street SE17 3AF
 7 Randall Court 14 Steedman Street SE17 3AF
 5 Randall Court 14 Steedman Street SE17 3AF
 3 Randall Court 14 Steedman Street SE17 3AF
 4 Randall Court 14 Steedman Street SE17 3AF
 Apartment 206 1 St Gabriel Walk SE1 6FA
 Apartment 407 1 St Gabriel Walk SE1 6FA
 Apartment 408 1 St Gabriel Walk SE1 6FA
 Apartment 406 1 St Gabriel Walk SE1 6FA
 Apartment 404 1 St Gabriel Walk SE1 6FA
 Apartment 405 1 St Gabriel Walk SE1 6FA
 Apartment 501 1 St Gabriel Walk SE1 6FA
 Apartment 505 1 St Gabriel Walk SE1 6FA
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 Apartment 503 1 St Gabriel Walk SE1 6FA
 Apartment 403 1 St Gabriel Walk SE1 6FA
 Apartment 302 1 St Gabriel Walk SE1 6FA
 Apartment 303 1 St Gabriel Walk SE1 6FA
 Apartment 301 1 St Gabriel Walk SE1 6FA
 Apartment 207 1 St Gabriel Walk SE1 6FA
 Apartment 208 1 St Gabriel Walk SE1 6FA
 Apartment 304 1 St Gabriel Walk SE1 6FA
 Apartment 401 1 St Gabriel Walk SE1 6FA
 Apartment 402 1 St Gabriel Walk SE1 6FA
 Apartment 307 1 St Gabriel Walk SE1 6FA
 Apartment 305 1 St Gabriel Walk SE1 6FA
 Apartment 306 1 St Gabriel Walk SE1 6FA

 Apartment 2902 8 Walworth Road SE1 6EJ
 Apartment 2903 8 Walworth Road SE1 6EJ

 424 Lordship Lane London SE22 8NE
 42 Kelvington Road London SE15 3EH
 63 Ryedale SE22 0ql
 46 Borough Road London SE1 0AJ
 11b Nutcroft Road London SE15 1AG
 12 Empire Square South Empire Square SE1 4NF
 Flat 51 6 Shad Thames SE1 2YS
 19 Keswick House Camberwell SE59NL
 29 Wheler House London E1 6SS
 14 Cecilia Road London E8 2ep
 79 Pilton Place London SE17 1dp
 32 Garibaldi Street London SE18 1DE
 Flat 4 32 Arbuthnot Rd London SE14 5NP
 59 Choumert Road Peckham SE15 4AR
 18 Fernholme Road London SE15 3EF
 4 Freemantle Street London SE17 2JP
 14 Benhill Rd London SE5 7PT
 11 Culpeper Court Kennington Road SE11 6RA
 18 Oglander Road Peckham SE15 4EL
 95 Lynmouth Road London E17 8AG
 11 Romney Close London SE14 5jh
 27d Fairfield Gardens London N8 9DD
 208 Samuel Lewis Trust Warner Road SE5 9LY
 38 Mary Datchelor House London SE5 8FB
 141b Pepys Road London SE14 5SG
 Blakes Road London SE15 6gy
 Adys Road London SE15 4DZ
 83 St Marks Road, Hanwell, London London W7 2pn
 35 Cloudeley Road London N1 0EL
 14 St Augustines Court London SE1 5dp
 167 Drakefell Road London SE4 2DT
 25 Elam St London SE5 9HU
 5 Hogan Court, 57 Edmund St London SE5 7NF
 58 Cleveleys Road London E5 9JN
 13a Ackroyd Rd Honor Oak Park SE23 1DN
 10 Cotham St London SE17 1Lx
 35 Barclay Road London E11 3DQ
 12 Brunlees House London SE1 6qf
 Flat 4, Goschen House, 68 Peckham Road, Camberwell, London
 SE5 8qe SE5 8QE
 53 Monson Road London SE14 5eq
 53 Monson Road London SE14 5EQ
 Flat 18, Becket House Tabard Street SE1 4XY
 43 Falmouth Road London SE1 4JN
 55 Dalberg Road London SW2 1AJ
 15 Stuart Road Thornton Heath CR7 8RA
 11 Bemerton Street London N1 0BS
 49 Shenley Road London SE5 8ND
 12 Lind Street London SE8 4JE
 49 Hambledon Close Uxbridge UB8 3UD
 38 Peacock Street London SE17 3LF
 60b Culverley Road London SE6 2LA
 1a Peacock Yard London SE17 3LH
 10 Merritt Road London SE4 1DY
 111 Brookdale Road, London SE6 4JP
 46 Calthorpe Street London WC1 X0JZ
 48 St Stephens Road London E3 5JF
 61 Maxted Road London SE15 4LF
 75 Fenham Road Peckham SE15 1AB
 2 Thurlow Park Road London SE21 8JB
 41 Sevenoaks Road Honor Oak Park SE4 1RF
 Flat 3, Block K, Peabody Estate Duchy Street SE1 8AS
 Flat 1 Park House London SE5 7PP
 80 Hanworth House, John Ruskin St Southwark SE5 0XL
 17 King Arthur Close London SE15 2LP
 Flat 7 Newall House, Harper Road London SE1 6QD
 268 Neckinger Estate London SE16 3QB
 Elephant & Castle London SE1 6SB
 3a Parkhouse Street London SE5 7TQ
 320 Lexington, Fairfield Road London E3 2UE
 Flat 3, 4 Hammelton Road,, 110 Marylebone High Street
 Bromley BR1 3PY
 19 Adys Rd Peckham SE15 4DX
 33 Farm Wynd Glasgow G66 3RJ

Apartment 2901 8 Walworth Road SE1 6EJ
 Apartment 2810 8 Walworth Road SE1 6EJ
 Apartment 2811 8 Walworth Road SE1 6EJ
 Apartment 2904 8 Walworth Road SE1 6EJ
 Apartment 2908 8 Walworth Road SE1 6EJ
 Apartment 2909 8 Walworth Road SE1 6EJ
 Apartment 2907 8 Walworth Road SE1 6EJ
 Apartment 2905 8 Walworth Road SE1 6EJ
 Apartment 2906 8 Walworth Road SE1 6EJ
 Apartment 2809 8 Walworth Road SE1 6EJ
 Apartment 2801 8 Walworth Road SE1 6EJ
 Apartment 2802 8 Walworth Road SE1 6EJ
 Apartment 2711 8 Walworth Road SE1 6EH
 Apartment 2709 8 Walworth Road SE1 6EH
 Apartment 2710 8 Walworth Road SE1 6EH
 Apartment 2803 8 Walworth Road SE1 6EJ
 Apartment 2807 8 Walworth Road SE1 6EJ
 Apartment 2808 8 Walworth Road SE1 6EJ
 Apartment 2806 8 Walworth Road SE1 6EJ
 Apartment 2804 8 Walworth Road SE1 6EJ
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 Apartment 2910 8 Walworth Road SE1 6EJ
 Apartment 3104 8 Walworth Road SE1 6EJ
 Apartment 3105 8 Walworth Road SE1 6EJ
 Apartment 3103 8 Walworth Road SE1 6EJ
 Apartment 3101 8 Walworth Road SE1 6EJ
 Apartment 3102 8 Walworth Road SE1 6EJ
 Apartment 3106 8 Walworth Road SE1 6EJ
 Apartment 3110 8 Walworth Road SE1 6EJ
 Apartment 3111 8 Walworth Road SE1 6EJ
 Apartment 3109 8 Walworth Road SE1 6EJ
 Apartment 3107 8 Walworth Road SE1 6EJ
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 Apartment 3011 8 Walworth Road SE1 6EJ
 Apartment 3003 8 Walworth Road SE1 6EJ
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 Apartment 3002 8 Walworth Road SE1 6EJ
 Apartment 2911 8 Walworth Road SE1 6EJ
 Apartment 3001 8 Walworth Road SE1 6EJ
 Apartment 3005 8 Walworth Road SE1 6EJ
 Apartment 3009 8 Walworth Road SE1 6EJ
 Apartment 3010 8 Walworth Road SE1 6EJ
 Apartment 3008 8 Walworth Road SE1 6EJ
 Apartment 3006 8 Walworth Road SE1 6EJ
 Apartment 3007 8 Walworth Road SE1 6EJ
 Apartment 2708 8 Walworth Road SE1 6EH
 Apartment 2409 8 Walworth Road SE1 6EH
 Apartment 2410 8 Walworth Road SE1 6EH
 Apartment 2408 8 Walworth Road SE1 6EH
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 Apartment 2608 8 Walworth Road SE1 6EH
 10 Searson House London SE17 3AY
 Far View Farm Predannack Mullion TR12 7EY
 18 Rowhill Mansions Rowhill Road E5 8ED
 21b Grove Park London SE5 8LH
 8 Perth Road London N22 5RB
 272 High Holborn London WC1V 7EY
 Harefield Road London SE4 2DT
 110 Shenley Road London SE5 8NF
 2a Coulgate St London SE4 2RW
 21 College Road London SE21 7BG
 4b Springall St London SE15 2TY
 22 Lockwood House, Kennington Oval London SE11 5SZ
 81b Lytham Street Elephant & Castle SE17 2NN
 45 Hayes Grove London SE22 8DF
 45 Raleigh Drive London N20 0UX
 11 Southwood Court London EC1V 7HX
 26 Oakden Street London SE11 4UG
 60 Tyrrell Road London SE22 9NE
 80 Crystal Palace Park Road London SE26 6UN
 43 Wrigglesworth Street London SE14 5EG
 24 Pullens Buildings London SE17 3SJ
 28 Albert Square London SW8 1DA
 203 Havil St London SE5 7SB
 E2 6pe London SY1 2NL
 227 Ravensbourne Avenue London BR2 0BX
 148 Pilton Place Southwark SE17 1DJ
 89 Peabody Cottages, Rosendale Road London SE24 9DP
 83a Balfour Street London SE17 1PL
 24 Bridgehouse Court Blackfriars Road London SE1 8HW
 20 Faunce St London SE17 3TR
 20 Lansdowne Drive London E8 3EG
 Wychfield Site, Trinity Hall, Storey'S Way Cambridge CB3 0DZ
 3 Runacres Court Pasley Close SE17 3JZ
 Highline Building, 10 Steedman Street London SE17 3AF
 10 Steedman Street London SE17 3AF
 10 Steedman Street London SE17 3AF
 4 Worth Grove Walworth SE17 2HN
 158a Grosvenor Terrace London SE5 0NL
 31 Churchmead London SE5 0ET
 8d Grove Lane Southwark SE5 8SY
 23c Flodden Road London SE5 9LH
 45 Dfoe Road London N16 0EH
 Flat 19 Camberwell New Road, Hayes Court SE5 0TQ
 65b Warner Road London SE5 9NE
 60 Gloucester Drive London N4 2LN
 73 Crofton Park Road London SE4 1AJ
 13 Brackenbury Gardens, Brackenbury Gardens W6 0BP
 169 Fentiman Road London SW8 1JY
 169 Fentiman Road, First Floor Flat London SW8 1JY
 3a Parkhouse St London SE5 7TQ
 Haymerle Rd London Se15 6SY
 59 Kingsfield Road Watford WD19 4TP
 9 Dowlas Street London SE5 7TA
 54 Larcom Street London SE17 1NQ
 6 Tennyson Road Bath BA1 3BG
 39 Burghill Road Sydenham SE26 4HJ
 26 Richard Neale House London E1 2QN
 30 Peacock Street London SE17 3LF
 30-35 Peckham Road London se5 8px
 28 Begbie Road London SE38DA
 Flat 8, 115 Brandon Street London SE17 1AL
 27 Calypso Crescent Peckham SE15 6FP
 29 Benson House Hatfield London SE18DQ
 22 Lansdowne Gardens London SW82EG
 Flat 7, 136 Coldharbour Lane Lambeth SE5 9QH
 56 Crossmount House London SE5 0XB
 84 Lowth Road London SE5 9EX
 Via Email
 176 Lowden Road London SE24 0BT
 Flat 12, Kerin House, 252 Milkwood Road London SE24 0HP
 85c Balfour Street London SE17 1PB
 19 Clayhill Crescent London SE9 4JA
 6 London SE8 4DU
 131 Portland Street London SE17 2NR

Apartment 2609 8 Walworth Road SE1 6EH
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 Apartment 4003 8 Walworth Road SE1 6EL

 Apartment 1511 8 Walworth Road SE1 6EG
 Flat 2 183 Brook Drive SE11 4TG
 Flat 3 183 Brook Drive SE11 4TG
 Flat 1 183 Brook Drive SE11 4TG
 401 Julian Markham House 114 Walworth Road SE17 1JL
 Apartment 4102 8 Walworth Road SE1 6EL
 Apartment 4103 8 Walworth Road SE1 6EL
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 Apartment 4104 8 Walworth Road SE1 6EL
 Apartment 4203 8 Walworth Road SE1 6EL
 6 Walworth Road London SE1 6EB
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 Apartment 3204 8 Walworth Road SE1 6EJ

 64 Henley Drive London SE1 3AR
 22 Langton Road London SW9 6UY
 86 Arodene Road London SW2 2BH
 18d Breakspears Road London SE4 1UW
 117 Breakspears Rd London SE4 1TY
 Charleston St 17a SE17 1NG
 48a Bassein Park Road London W12 9RZ
 17a Charleston Street London SE17 1NG
 704 Chart House 6 Burrells Wharf Square E14 3TW
 Ground Floor 38 Hawarden Road E176ns
 Flat 2 Park House Camberwell Green London SE5 7PP
 3 Baillie House Horsley Street SE17 2AT
 11 Hawke Tower London SE14 6HJ
 79 Merritt Road London SE4 1DT
 10b Cotham Street Walworth SE17 1LX
 44 Lucas Street London SE8 4NT
 2a Southcote Road London N19 3BJ
 192b Drakefell Road London SE4 2DS
 24 Citrus House Alverton Street SE8 5NP
 96 Crofton Road London SE5 8NA
 169a Camberwell Grove London SE5 8JS
 25g Bassett Road London W10 6LA
 29 Redman House Lant Street SE1 1JU
 221 Gordon Road London SE15 3RT
 160b Stockwell Road London SW9 9TQ
 33 Princess Road London NW1 8JS
 28 Cooks Road Kennington SE17 3NF
 306b East Street London SE17 2SX
 18 Freemantle Street London SE17 2JP
 Browning St. London
 Flat 8 61 Peckham High Street SE15 5EB
 85 Chadwick Road Peckham SE15 4PU
 8 Wilds Rents London SE1 4QG
 3 Crossleigh Court West Drive SW16 1RS
 6 Vaughan Road London SE5 9NZ
 32 Silverburn House Lothian Rd SW9 6TY
 188 Courtauld Road London N19 4BA
 22 Wroxtton Road SE15 2BN
 53 Rokesly Avenue London N8 8NH
 Strada Casa Rondinai 6 Perugia
 Flat 1 - 167 Camberwell Road London SE5 0HB
 Rockaway House Bristol BS395BU
 502a Landale House, Ardent Waterside, Lower Road London SE16 2XG
 9 Playfield Crescent London SE23 2ET
 58 Harpenden Road London SE27 0AF
 Flat 2 135 Tredegar Road E3 2EU
 141a Wembley Park Drive London HA9 8HQ
 86f Talfourd Road London SE15 5NZ
 5 Wisden House, Meadow Road London SW8 1NA
 96b Meeting House Lane London SE15 2TT
 195 Albion Road London N16 9JU
 Flat 34 Gilesmead 79 Camberwell Church Street SE5 7LN
 9 Steedman Street Flat 601 SE17 3BA
 422 Lordship Lane London SE22 8NE
 304 Latimer Road London W106QW
 Flat 6 12 Steedman St SE17 3AF
 542 Samuel Lewis Trust Estate Warner Road SE5 9NB
 28 C Springdale Road London N169NX
 Flat 34 Gilesmead 79 Camberwell Church Street SE5 7LN
 385-401 Holloway Road Flat 33f N7 0RY
 40 Saltwood Grove London SE17 2HL
 127a Gaisford Street London NW5 2EG
 Flat 3 Elmtree Court 56 Valmar Road SE5 9NH
 42 Prospect Road, Southborough Tunbridge Wells TN40EN
 32 Henshaw Street London SE17 1PD
 7 Brockley House Sedan Way SE17 2LW
 33, Kemsing Road London SE10 0LL
 87 Orange Grove London E11 4LP
 51 Edric Road London SE14 5EN
 48 Peckham Park London SE15 6TT
 10 Copperfeild St London SE1 0EP
 40 Phelp Street London SE17 2PL
 30 Langdale Close London SE17 3UF

Apartment 3205 8 Walworth Road SE1 6EJ
 Apartment 3203 8 Walworth Road SE1 6EJ
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 19 Sadler'S Court 30a Wilds Rents SE1 4BP
 10 Arrowsmith House London SE11 5HA
 23 Hamonde Close London HA8 8TG
 11 Brackenbury Osborne Road N4 3SA
 60 Cadet Drive London SE1 5RU
 26 Angelina House Londona Se155ub
 23 Alberta Street London SE17 3SF
 54 Norcott Road London N16 7EL
 86c Hackford Road London SW9 0RG
 18 Davies Close CR0 6EX
 32 Lisford Street London SE15 5GR
 84 Lowth Road London SE5 9EX
 10 Palmer House Lubbock Street SE14 5HX
 209 Malpas Road London SE4 1BH
 Flat 58, Witley Court Coram Street WC1N 1HD
 17 Holbeck Row London SE15 1QA
 54 Fleming Road London SE17 3QR
 71 Claylands Road London SW8 1PJ
 13a Parkhouse Street London SE5 7TQ
 63 Cavendish Road London N4 1RR
 52 Nutcroft Road London SE15 1AF
 63 Ellerdale St London SE13 7JX
 119 Newington Causeway London SE1 6DT
 18a Egmont Street London SE14 5QJ
 18a Egmont Street London SE14 5QJ
 Flat 1 9 Wyneham Road SE24 9NT
 7 Mcmillan House, Arica Road London SE4 2PU
 18 Lucerne Street Liverpool L17 8xt
 17 Davenport Road London SE6 2AY
 29 Rodney Place London SE17 1PP
 94 Iliffe Street London SE17 3LL
 20 Honiton Gardens Gibbon Road SE15 2AT
 23 Ashmore Close London SE15 5GY
 59b Harlescott Rd Nunhead SE15 3DA
 22 Gerard Road Harrow HA1 2NE
 5 Milner Court, 9 Colegrove Road London SE15 6NG
 47b East Dulwich Road Se22 9an London Se22 9an
 Bees Cottage, Ashford Lane Steep GU32 1AB
 71 A First Floor Flat Rye Lane se15 5ex
 12 Ada Road, Camberwell London SE5 7RW
 Flat 65 9 Rossetti Road SE16 3EY
 Flat 65 9 Rossetti Road SE16 3EY
 55 Cossall Walk London SE15 2TN
 4 Innes Lodge Inglemere Road SE23 2BD
 66 Northiam Street London E9 7HX
 11 Artbrand House 7 Leathermarket Street SE1 3FB
 47 Sunnyhill Road London SW16 2UG
 32 Greenhill Park London Nw10 9AP
 8 Culand House Congreve Street SE17 1ST
 43 Aberavon Road London E3 5AR
 56 Evelyn Grove Southall UB1 2BP
 58 Southwell Road London SE5 9PG
 9 Sanford Walk London se14 6nb
 60 Tyrrell Road, East Dulwich London SE229NE
 Flat 2c Morna Road Camberwell SE5 9NJ
 10c Downs Road London E5 8DD
 81 Longhurst Lane Stockport SK6 5AH
 143a Evelina Road London SE15 3HB
 43 Francis Road London E106PN
 Alexandra Wharf London E2 9SJ
 245 Cannon Lane Pinner HA5 1JE
 2 Lily Mews London SE114FN
 127 Shelbourne Rd London N17 9YD
 27 Clarendon Walk London w11 1sn
 55 Median Road London
 1b Cranes Park Avenue London SE15 3PF
 No Address
 12 Freegrove Road London N7 9JN
 9 Rockley Road London W14 0BT
 Springfield House London SE5 8JY
 15 St Saviours Road Sw2 5hp
 97 E Denmark Hill Camberwell se58aa
 31 Cricketfield Road Hackney E5 8NR

54 Metro Central Heights 119 Newington Causeway SE1 6BA
 58 Metro Central Heights 119 Newington Causeway SE1 6BA
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 Flat 12 St Matthews Court SE1 6RG
 Flat 13 St Matthews Court SE1 6RG
 Flat 11 St Matthews Court SE1 6RG
 Flat 9 St Matthews Court SE1 6RG
 Flat 10 St Matthews Court SE1 6RG
 Flat 14 St Matthews Court SE1 6RG
 32 New Kent Road London SE1 6TJ
 The Rectory St Matthews Court SE1 6RG
 Flat 15 St Matthews Court SE1 6RG
 Flat 16 St Matthews Court SE1 6RG
 Flat 8 St Matthews Court SE1 6RG
 The Charlie Chaplin 26 New Kent Road SE1 6TJ
 Flat 1 St Matthews Court SE1 6RG
 50 New Kent Road London SE1 6TW
 Flat 10a Binnie House Rockingham Estate SE1 6QG
 81 New Kent Road London SE1 6RB
 Flat 2 St Matthews Court SE1 6RG
 Flat 6 St Matthews Court SE1 6RG
 Flat 7 St Matthews Court SE1 6RG
 Flat 5 St Matthews Court SE1 6RG
 Flat 3 St Matthews Court SE1 6RG
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 Flat 3 Metro Central Heights SE1 6BA
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 30 New Kent Road London SE1 6TJ
 34 New Kent Road London SE1 6TJ
 Flat 4 Metro Central Heights SE1 6BA
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 7 Metro Central Heights 119 Newington Causeway SE1 6BA
 Flat 5 Metro Central Heights SE1 6BA
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 128 Metro Central Heights 119 Newington Causeway SE1 6BB
 129 Metro Central Heights 119 Newington Causeway SE1 6BB
 127 Metro Central Heights 119 Newington Causeway SE1 6BB
 124 Metro Central Heights 119 Newington Causeway SE1 6BB

 13 Manor Place London SE17 3BD
 29 Brownswood Road London N4 2HP
 2408 Strata London SE1 6EJ
 1 Kember Str London n1 1bf
 274 Upland Road London Se22 0dn
 14 Machell Rd London se153xq
 68 Downham Road London N1 5BG
 1 Fielding Street Walworth
 Bryant House London EC2Y 8DE
 Flat 26 Winch House Stead Street SE171BP
 Flat 5 Winch House SE17 1BP
 12 Winch House Stead Street SE171BP
 84a Standon Park, Flat A London SE231JS
 Flat 2 Winch House Stead Street SE17 1BP
 Flat 23 Winch House Stead Street SE17 1BP
 142 Mercers Road London N19 4PU
 29 Anerley Hill London SE19 2BA
 3 Stockham Court Rodney Road se17 1at
 30 Langdale Close London SE17 3UF
 Stead Street, Winch House, Flat 9 London SE17 1BP
 Stead Street, Winch House, Flat 9 London SE17 1BP
 Flat 6, 58 Bramcote Arms Bramcote Grove SE163BW
 86 Allison Road 86 Allison Road N8 0AS
 1 Primula Drive Norwich NR4 7LZ
 1 Primula Drive Norwich NR47LZ
 27 Oswin Street London
 39 Gordonbrock Road London SE4 1JA
 68 Walters House Otto Street London SE17 3PG
 7 Tavern Court 95 New Kent Road SE1 6RY
 Apartment 10.04 1 St Gabriel Walk SE1 6FB
 9 Peace Court London SE1 5TR
 Apartment 480, Metro Central Heights 119 Newington Causeway SE1 6DT
 32 Dryden Court London SE114NH
 8 St Edmunds House London se17 2ar
 3 Sister Mabel'S Way, Peckham London SE15 6UL
 Second Floor, 151 Borough High Street, Southwark London SE1 1HR
 12 Copleston Road London SE154AD
 Flat 31 Peterchurch House Ledbury Estate SE151NF
 Marshalsea Road London SE1 1JW
 27 Bourneside Gardens London SE63NT
 5 Soane House, Roland Way London SE17 2JF
 39 Astley House, Rowcross Street London SE1 5HT
 85 Pilton Place, Off King & Queen Street Walworth SE171DP
 15 Aylesbury Road London SE17 2EQ
 155 John Ruskin St London SE5 0PQ
 53 Bence House London SE8 5RU
 35 Ewelme Road London SE233BQ
 Via Email
 Via Email
 12 Ringer House London SE22 8AR
 10 Trevelyan House, John Ruskin St London SE5 0SY
 9 Bloom Park Road, Sw6 7bg London SW6 7BG
 152 Oxley Close London SE1 5HP
 10 Waterside Close London SE16 4QG
 Ec Shopping Centre London SE1 6TE
 181 Wendover London SE17 2UE
 17 Crofton Park Road London SE4 1AF
 67b Kennington Park Road London SE11 4JQ
 Flat 1, 40 Lansdowne Crescent Glasgow G20 6NH
 11 Meard Street London W1F 0ER
 18 Rothesay Court, Harleyford Road London SE11 5SU
 18 Rothesay Court, Harleyford Road London SE11 5SU
 Flat 704 Siddal Apartments Heygate Street SE17 1FQ
 73 Marlborough Close London SE17 3AW
 13 Evesham Walk London SE5 8SJ
 67a Larcom Street London SE17 1NJ
 9 William Evans Hse London SE8 5AU
 32b Larcom Street London SE17 1NQ

126 Metro Central Heights 119 Newington Causeway SE1 6BB	403 Stock House 29 Wansey Street SE17 1FE
130 Metro Central Heights 119 Newington Causeway SE1 6BB	4 Exon Street London SE17 2JW
135 Metro Central Heights 119 Newington Causeway SE1 6BB	92 Northfield House Peckham Park Road
136 Metro Central Heights 119 Newington Causeway SE1 6BB	London College Of Communication SE1 6SB
134 Metro Central Heights 119 Newington Causeway SE1 6BB	London College Of Communication SE1 6SB
131 Metro Central Heights 119 Newington Causeway SE1 6BB	Flat 3, 15 Hayles Street London SE11 4SU
132 Metro Central Heights 119 Newington Causeway SE1 6BB	By Email
166 Metro Central Heights 119 Newington Causeway SE1 6BT	25 Finsbury Circus EC2M 7EE
167 Metro Central Heights 119 Newington Causeway SE1 6BT	
165 Metro Central Heights 119 Newington Causeway SE1 6BT	
163 Metro Central Heights 119 Newington Causeway SE1 6BT	
164 Metro Central Heights 119 Newington Causeway SE1 6BT	
168 Metro Central Heights 119 Newington Causeway SE1 6BT	By Email
	By Email

Re-consultation: 14/02/2018

APPENDIX 2

Consultation responses received

Internal services

Public Health Team

Statutory and non-statutory organisations

City Of London
 City of Westminster
 Environment Agency
 Greater London Authority
 Health & Safety Executive
 Historic England
 London Borough of Bromley
 London Borough of Islington
 London Overground
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 Natural England - London Region & South East Region
 Network Rail (Planning)
 Thames Water - Development Planning
 The Royal Parks
 The Theatres Trust
 Transport for London (referable & non-referable app notifications and pre-apps)
 Twentieth Century Society

Neighbours and local groups

X
 Adys Road London SE15 4DZ
 Alexandra Wharf London E2 9SJ
 All Hallows Church, 10 Copperfield Street London SE1 0EP

Apartment 1001 8 Walworth Road SE1 6EE
Apartment 10.04 1 St Gabriel Walk SE1 6FB
Apartment 10.04 1 St Gabriel Walk SE1 6FB
Apartment 10.04 1 St Gabriel Walk SE1 6FB
Apartment 1009 8 Walworth Road SE1 6EE
Apartment 1407 1 St Gabriel Walk SE1 6FB
Apartment 16.06 1 St Gabriel Walk SE1 6FB
Apartment 1806 1 St Gabriel Walk SE1 6FB
Apartment 1911 8 Walworth Road SE1 6EG
Apartment 2405 1 St Gabriel Walk SE1 6FD
Apartment 2506 1 St Gabriel Walk SE1 6FD
Apartment 29.05 1 St Gabriel Walk SE1 6FD
Apartment 301 8 Walworth Road SE1 6EE
Apartment 3104 1 St Gabriel Walk SE1 6FF
Apartment 3201 8 Walworth Road SE1 6EJ
Apartment 3201 8 Walworth Road SE1 6EJ
Apartment 3201 8 Walworth Road SE1 6EJ
Apartment 3203 8 Walworth Road SE1 6EJ
Apartment 3305 1 St Gabriel Walk SE1 6FF
Apartment 3501 1 St Gabriel Walk SE1 6FB
Apartment 3501 1 St Gabriel Walk SE1 6FB
Apartment 3502 1 St Gabriel Walk SE1 6FB
Apartment 480, Metro Central Heights 119 Newington Causeway SE1 6DT
Apartment 505 1 St Gabriel Walk SE1 6FA
Apartment 505 1 St Gabriel'S Walk SE1 6FA
Apartment 601 8 Walworth Road SE1 6EE
Apartment 607 1 St Gabriel Walk SE1 6FA
Apartment 607 1 St Gabriel Walk SE1 6FA
Apartment 808 1 St Gabriel Walk SE1 6FA
Apt 1405 1 St Gabriel Walk SE1 6FB
Apt 28.07 1 St Gabriel Walk SE1 6FD
Apt 28.07 1 St Gabriel Walk SE1 6FD
Auckland Street London SE11 5AB
B One The Elephant SE1 6FD
Ballards Lane London N3 2bu
Barset Road London SE15 3HE
Basement Flat 25 West Square SE11 4SP
Bees Cottage, Ashford Lane Steep GU32 1AB
Blakes Road London se156gy
Browning St. London
Bryant House London EC2Y 8DE
By E-Mail
By E-Mail
By Email
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By Email
By Email X
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Charleston St 17a SE17 1NG
Charleston St 17a SE17 1NG
Christmas Cottage Southstoke BA2 7DL

Cinema Theatre Association X
 Cinema Theatre Association X
 C/O E-Mail
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 C/O Shopping Centre Elephant And Castle SE1
 Conservation Areas Advisory Group For Southwark X
 Ec Shopping Centre London SE1 6TE
 Elephant & Castle Traders Association
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 Equinox Southampton Way London SE5 7HQ
 E2 6pe London SY1 2NL
 Far View Farm Predannack Mullion TR12 7EY
 First Floor Flat, 2 Alpha Road London SE14 6TZ
 Flat K/35, Du Cane Court, Balham High Road London SW17 7JY
 Flat 1 - 167 Camberwell Road London SE5 0HB
 Flat 1 Park House London SE5 7PP
 Flat 1 Restormel House Kennington SE11 4UU
 Flat 1, 2 Jowett Street London SE15 6JN
 Flat 1 295 Camberwell New Road SE5 0TN
 Flat 1 295 Camberwell New Road SE5 0TN
 Flat 1, 3 Lennox Rd London SW9 7BF
 Flat 1, 309 Camberwell Road London SE5 0H1
 Flat 1, 40 Lansdowne Crescent Glasgow G20 6NH
 Flat 1 9 Wyneham Road SE24 9NT
 Flat 1, 92 Landcroft Road East Dulwich SE22 9JT
 Flat 10 Cameron House London SE5 0UJ
 Flat 104, Rowland Hill House Nelson Square SE1 0LU
 Flat 106 Denmark Hill London SE5 8RX
 Flat 1, 144 Croxted Road London SE21 8NR
 Flat 12, Kerin House, 252 Milkwood Road London SE24 0HP
 Flat 13 117 Lewisham Way London SE14 6QJ
 Flat 14 1 Oswin Street SE11 4TF
 Flat 14 102 Westminster Bridge Road SE1 7XT
 Flat 15, Grenier Apartments, 18 Gervase Street London SE15 2RS
 Flat 16-18 Wentworth Mansions, Keats Grove London NW3 2RL
 Flat 17, Horton House Richborne Terrace SW8 1PT
 Flat 17, Stephenson House, Bath Terrace London SE1 6PP
 Flat 18, Becket House Tabard Street SE1 4XY
 Flat 19 Camberwell New Road, Hayes Court SE5 0TQ
 Flat 19 26 Arch Street SE1 6AT
 Flat 2 Alexandra Court 45a Urlwin Street SE5 0AB

Flat 2 Bushey Hall, Bushey Hill Road London SE5 8QG
 Flat 2 Park House Camberwell Green London SE5 7PP
 Flat 2 Winch House Stead Street SE17 1BP
 Flat 2 21 Oswin Street SE11 4TF
 Flat 2 3 - 5 Oswin Street SE11 4TF
 Flat 2 3 - 5 Oswin Street SE11 4TF
 Flat 2, 46d Bird In Bush Rd Peckham SE15 6RW
 Flat 2 97 Warour Street W1F 0UF
 Flat 2c Morna Road Camberwell SE5 9NJ
 Flat 22 26 Arch Street SE1 6AT
 Flat 23 Wilmot House 5 George Mathers Road SE11 4BQ
 Flat 23 Winch House Stead Street SE17 1BP
 Flat 25 Bridgehouse Court 109-115 Blackfriars Road SE1 8HW
 Flat 26 Rokeby House Balham SW128PX
 Flat 26 Winch House Stead Street SE171BP
 Flat 3, Block K, Peabody Estate Duchy Street SE1 8AS
 Flat 3 Culand House Congreve Street SE17 1ST
 Flat 3 Culand House Congreve Street SE17 1ST
 Flat 3 Elmtree Court 56 Valmar Road SE5 9NH
 Flat 3 1 Arborfield Close SW2 3NX
 Flat 3, 15 Hayles Street London SE11 4SU
 Flat 3 295a Walworth Road SE17 2TG
 Flat 3, 369 Clapham Road London SW9 9BT
 Flat 3, 4 Hammelton Road,, 110 Marylebone High Street Bromley BR1 3PY
 Flat 3 43 Oswin Street SE11 4TF
 Flat 3 43 Oswin Street SE11 4TF
 Flat 3 43 Oswin Street SE11 4TF
 Flat 303 International House 1-5 Lambeth Road SE1 7DQ
 Flat 304 London SE17 3BA
 Flat 31 Peterchurch House Ledbury Estate SE151NF
 Flat 31 Peterchurch House Ledbury Estate SE151NF
 Flat 34 Gilesmead 79 Camberwell Church Street SE5 7LN
 Flat 34 Gilesmead 79 Camberwell Church Street SE5 7LN
 Flat 35, Ashton House, 53 Cottington Street, Flat 35 London SE11 4BN
 Flat 4, Goschen House, 68 Peckham Road, Camberwell, London Se5 8qe SE5 8QE
 Flat 4, Goschen House, 68 Peckham Road, Camberwell, London Se5 8qe SE5 8QE
 Flat 4, Suffolk House, Rushcroft Road London SW2 1LF
 Flat 4 129 Southampton Way SE5 7EW
 Flat 4 32 Arbuthnot Rd London SE14 5NP
 Flat 4 5 Oswin Street SE11 4TF
 Flat 4, 7 John Maurice Close London SE17 1PY
 Flat 4, 7 John Maurice Close London SE17 1PY
 Flat 40 Douglas Buildings London SE1 1EJ
 Flat 405 South City Court 52 Peckham Grove SE15 6AW
 Flat 410, Strata Se1 8 Walworth Road SE1 6EE
 Flat 48 130 Webber Street SE1 0JN
 Flat 5 Winch House SE17 1BP
 Flat 50 Mistral SE5 7DS
 Flat 50 Mistral SE5 7DS
 Flat 51 6 Shad Thames SE1 2YS
 Flat 52 London E2 6PG
 Flat 58, Witley Court Coram Street WC1N 1HD
 Flat 6 Gillray House London SW10 0BT
 Flat 6 12 Steedman St SE17 3AF
 Flat 6, 137 Trafalgar St London SE17 2TP
 Flat 6, 137 Trafalgar St Southwark SE17 2TP
 Flat 6, 58 Bramcote Arms Bramcote Grove SE163BW
 Flat 60 Dawes House, Orb Street London SE17 1RD
 Flat 60 Dawes House, Orb Street London SE17 1RD

Flat 62, Hayles Buildings, Elliotts Row London SE11 4TD
 Flat 65 Albert Barnes House SE1 6PJ
 Flat 65 9 Rossetti Road SE16 3EY
 Flat 65 9 Rossetti Road SE16 3EY
 Flat 7, Block J, Peabody Estate, Camberwell Green London SE5 7BW
 Flat 7 Newall House, Harper Road London SE1 6QD
 Flat 7, 136 Coldharbour Lane Lambeth SE5 9QH
 Flat 704 Siddal Apartments Heygate Street SE17 1FQ
 Flat 8 Woods Place London SE1 3BS
 Flat 8, 115 Brandon Street London SE17 1AL
 Flat 8, 53 Honor Oak Road London SE23 3SH
 Flat 8 61 Peckham High Street SE15 5EB
 Flat 81, Dorchester Court London SE24 9QY
 Flat 88 Joseph House, Amhurst Park London N16 5AH
 Great Dover Street London SE1 4LB
 Ground Floor 38 Hawarden Road E176ns
 Hanover Park House 14-16 Hanover Park SE15 5HG
 Harefield Road London SE4 2DT
 Harfield Gardens London SE5 8DB
 Haymerle Rd London Se15 6SY
 Highline Building, 10 Steedman Street London SE17 3AF
 Ivydale Rd London SE15 3DZ
 London College Of Communication SE1 6SB
 Marshalsea Road London SE1 1JW
 Melbway House London SE1 6BF
 Metropolitan Tabernacle Church Elephant And Castle SE1 6SD
 Metropolitan Tabernacle Church Elephant And Castle SE1 6SD
 Mornington Centre, Stanley Street London SE8 4BL
 No Address
 No Address
 No Address N4 1LZ
 No Address X
 No Address X
 One The Elephant 1 St Gabriel Walk SE1 6FD
 One The Elephant 1 St Gabriel Walk SE1 6FD
 Priory House 25 St John'S Lane EC1M 4LB
 Rockaway House Bristol BS395BU
 Second Floor, 151 Borough High Street, Southwark London SE1 1HR
 Sophia Road London E10 5AX
 Southbank London SE1 4JQ
 Southwark Council SE1 2QH
 Springfield House London SE5 8JY
 St Philip'S Vicarage, Avondale Square London SE1 5PD
 Stead Street, Winch House, Flat 9 London SE17 1BP
 Stead Street, Winch House, Flat 9 London SE17 1BP
 Strada Casa Rondinai 6 Perugia
 The Cutting Room Unit 5 N4 1DN
 The Theatres Trust 22 Charing Cross Road WC2H 0QL
 The Water Tower London SE1 4RU
 Thorney Creek House, Herschel Road Cambridge CB3 9AU
 Top Flat, 111 Upper Brockley Road London SE4 1TF
 Tytherly, Perrymead Bath BA2 5AX
 T3601 1 St Gabriel Walk SE1 6FF
 Ucl 14 Upper Woburn Place London WC1H 0NN
 Unit 203 By Email
 Unit 217 Shopping Centre SE1 6TE
 Via Email
 Via Email
 Wychfield Site, Trinity Hall, Storey'S Way Cambridge CB3 0DZ

1 Fielding Street Walworth
 1 Gorefield House,, Canterbury Road, London NW6 5TA
 1 Kember Str London n1 1bf
 1 Oswin Street London SE11 4TF
 1 Primula Drive Norwich NR4 7LZ
 1 Primula Drive Norwich NR47LZ
 1 St Gabriel Walk, Apartment 2105 One The Elephant SE1 6FD
 1 St Gabriel Walk, Apartment 2105 One The Elephant SE1 6FD
 1 St Gabriel Walk London SE1 6FB
 1 St Gabriel Walk London SE1 6FD
 1a Brownswood Road London N4 2HP
 1a Peacock Yard London SE17 3LH
 1b Cranes Park Avenue London SE15 3PF
 1b St Faiths Road Flat 2 SE21 8JD
 1b St Faiths Road Flat 2 SE21 8JD
 1c Austral Street London SE114SJ
 10 Arrowsmith House London SE11 5HA
 10 Bradley Green Aldermoor SO16 5HZ
 10 Copperfeild St London SE1 0EP
 10 Cotham St London Se17 1Lx
 10 Gaywood Street London SE1 6HG
 10 Merritt Road London SE4 1DY
 10 Muirfield, Redhouse Swindon SN252DD
 10 Palmer House Lubbock Street SE14 5HX
 10 Perronet House, Princess Street London SE1 6JR
 10 Scholes Rise Sheffield S359UQ
 10 Scholes Rise Sheffield S359UQ
 10 Searson House London SE17 3AY
 10 Steedman Street London SE17 3AF
 10 Steedman Street London SE17 3AF
 10 Steedman Street London SE17 3AF
 10 Trevelyan House, John Ruskin St London SE5 0SY
 10 Waterside Close London SE16 4QG
 10b Brabourn Grove London SE15 2BS
 10b Cotham Street Walworth SE17 1LX
 10b Turquand Street SE17 1LT
 10b Turquand Street London SE17 1LT
 10c Downs Road London E5 8DD
 10c Overbury Road London N15 6RH
 10.02 One The Elephant London SE1 6FB
 101 Upland Road London SE22 0DB
 102 Lymington Avenue London N22 6JG
 103 Draper House 20 Elephant & Castle SE1 6SY
 103 Draper House 20 Elephant & Castle SE1 6SY
 104a Carter Street London SE17 3EW
 106c Camberwell Grove London SE5 8JH
 107a Copleston Road London SE15 4AQ
 11 Artbrand House 7 Leathermarket Street SE1 3FB
 11 Bemerton Street London N1 0BS
 11 Brackenbury Osborne Road N4 3SA
 11 Culpeper Court Kennington Road SE11 6RA
 11 Delawyck Crescent London SE24 9JB
 11 Hawke Tower London SE14 6HJ
 11 Meard Street London W1F 0ER
 11 Romney Close London SE14 5jh
 11 Southwood Court London EC1V 7HX
 11b Nutcroft Road London SE15 1AG
 110 Shenley Road London SE5 8NF
 111 Brookdale Road, London SE6 4JP

112 Camberwell Grove London SE5 8RQ
 116 Camberwell New Road London SE5 0RS
 116 Glanville Road London SW2 5DF
 116 Thurlow Street, London London SE17 2UE
 116 Walworth Road London SE1 5SW
 116 Walworth Road London SE1 5SW
 116 Walworth Road London SE1 5SW
 117 Breakspears Rd London SE4 1TY
 118 Buchan Road London SE15 3HG
 118 Rochdale Road, Abbey Wood London SE20XB
 119 Casino Avenue Herne Hill SE24 9PP
 119 Newington Causeway London SE1 6DT
 12 Ada Road, Camberwell London SE5 7RW
 12 Brunlees House London se1 6qf
 12 Copleston Road London SE154AD
 12 Copleston Road London SE154AD
 12 Copleston Road London SE154AD
 12 Empire Square South Empire Square SE1 4NF
 12 Freegrove Road London N7 9JN
 12 Hayles Street London SE11 4SS
 12 Hayles Street London SE11 4SS
 12 Hind Grove London E14 6HU
 12 Leary House London SE11 5LH
 12 Lind Street London SE8 4JE
 12 Malpas Road London SE4 1BS
 12 Ringer House London SE22 8AR
 12 Upland Road London SE22 0DL
 12 Whitgift House London SE11 6AG
 12 Winch House Stead Street SE171BP
 12a Upper Hamilton Road Brighton BN1 5DF
 12b Gaywood Street London SE1 6hg
 12b Gaywood Street London SE1 6hg
 123 Landcroft Road London Se22 9jp
 125b Brook Drive London SE11 4TQ
 126a Barry Road London SE22 0HP
 126a Barry Road London SE22 0HP
 127 Shelbourne Rd London N17 9YD
 127a Gaisford Street London NW5 2EG
 128 Benhill Road London SE5 7LZ
 128 Benhill Road London SE5 7LZ
 13 Black Prince Road Se11 6bz SE11 6BZ
 13 Brackenbury Gardens, Brackenbury Gardens W6 0BP
 13 Eccleston Street London Sw1w 9lx
 13 Evesham Walk London SE5 8SJ
 13 Framlingham Close London E5 9PR
 13 Framlingham Close London E5 9PR
 13 Freemantle Street London SE17 2JP
 13 Hayles Street Kennington SE11 4SU
 13 Manor Place London SE17 3BD
 13 St Georges Buildings St Georges Road SE1 6EP
 13a Ackroyd Rd Honor Oak Park SE23 1DN
 13a Parkhouse Street London SE5 7TQ
 130 Draper House 20 Elephant And Castle X
 130 Draper House 20 Elephant And Castle X
 131 Kennington Park Rd London SE11 4JJ
 131 Portland Street London SE17 2NR
 131a Peckham Rye London SE15 3UL
 135 Sunnymead Avenue Gillingham Me7 2eb
 137b Coldharbour Lane London SE5 9NU

138 Lancaster Road, First Floor Flat London W11 1QU
 138 The Circle Queen Elizabeth Street SE1 2JJ
 138b Roding Road London E5 0DS
 14 Benhill Rd London SE5 7PT
 14 Cecilia Road London E8 2ep
 14 Machell Rd London se153xq
 14 Marney Road London SW11 5EP
 14 St Augustines Court London se1 5dp
 141a Wembley Park Drive London HA9 8HQ
 141b Pepys Road London SE14 5SG
 142 Mercers Road London N19 4PU
 143a Evelina Road London SE15 3HB
 144 Caroline Gardens, Asylum Road London SE15 2SG
 145 Kennington Park Road London SE11 4JJ
 145 Kennington Park Road London SE11 4JJ
 146 Milligan Street London E14 8AS
 146c Lordship Lane, East Dulwich London SE22 8HD
 146c Southwark Bridge Road London SE1 0DG
 146c Southwark Bridge Road London SE1 0DG
 147 Langham Road London N15 3LP
 148 Pilton Place Southwark SE17 1DJ
 148a Jerningham Road London SE14 5NL
 15 Alberta Street London SE17 3SF
 15 Asylum Rd London SE15 4HZ
 15 Aylesbury Road London SE17 2EQ
 15 Aylesbury Road London SE17 2EQ
 15 Aylesbury Road London SE17 2EQ
 15 K Southwark Street London SE1 0TN
 15 Oswin Street London SE11 4TF
 15 Oswin Street London SE11 4TF
 15 Oswin Street London SE11 4TF
 15 Oswin Street London SE11 4TF
 15 Oswin Street London SE11 4TF
 15 Oswin Street London SE11 4TF
 15 Rankine House Bath Terrace SE1 6PL
 15 St Saviours Road Sw2 5hp
 15 Stuart Road Thornton Heath CR7 8RA
 15 West Square London SE11 4SN
 15a New Church Road London SE5 7JH
 152 Crampton Street London SE17 3AE
 152 Oxley Close London SE1 5HP
 152 Pomeroy Street London SE14 5BT
 155 John Ruskin St London SE5 0PQ
 155 Queen'S Road London SE15 2ND
 156 Taplow Thrurlow St. London SE17 2UJ
 158 Rowan Road London SW16 5JQ
 158 Rowan Road Streatham SW16 5JQ
 158a Grosvenor Terrace London SE5 0NL
 159 Girdlestone Walk London N195DW
 159b Clarence Road London E5 8EE
 16 Abbey Terrace London SE2 9EY
 16 Addington Sq London SE5 7JZ
 16 Brunlees House London SE1 6QF
 16 Metro Central Heights 119 Newington Causeway SE1 6BA
 16a Charleston Street London SE17 1NF
 16b Eastlake Road London SE5 9QL
 160 Copleston Road London SE22 0NW
 160 Crampton St London SE17 3AE
 160 Tooley Street London SE1 2TZ

160b Stockwell Road London SW9 9TQ
 162 Brixton Road London SW90 6AU
 162 Caroline Gardens Asylum Road SE15 2SG
 163, Merrow St Walworth SE17 2NY
 165 John Ruskin Street London SE5 0PQ
 165 John Ruskin Street London SE5 0PQ
 167 Drakefell Road London SE4 2DT
 168 Walworth Road London SE17 3PS
 169 Fentiman Road, First Floor Flat London SW8 1JY
 169 Fentiman Road London SW8 1JY
 169 Upland Rd London SE22 0DF
 169a Camberwell Grove London SE5 8JS
 17 Brabourn Grove London SE15 2BS
 17 Brunlees House London SE1 6QF
 17 Crofton Park Road London SE4 1AF
 17 Davenport Road London SE6 2AY
 17 King Arthur Close London SE15 2LP
 17 Levehurst House London SE27 0HA
 17 Lyndhurst Grove London SE15 5AN
 17 Lyndhurst Grove London SE15 5AN
 17 Melbway House. 18 Meadow Row London SE1 6BF
 17 West Square London SE11 4SN
 17a Charleston Street London SE17 1NG
 17a Charleston Street London SE17 1NG
 171 Brook Drive London SE11 4TG
 171 Brook Drive London SE11 4TG
 171 Brook Drive London SE11 4TG
 171 Brook Drive London SE11 4TG
 171 Brook Drive London SE11 4TG
 173b Leighton Road London NW5 2RD
 176 Lowden Road London SE24 0BT
 18 Azalea House New Cross SE14 6BA
 18 Casino Avenue London SE24 9PH
 18 Casino Avenue London SE24 9PH
 18 Davies Close CR0 6EX
 18 Dunnico House East Street SE17 2JL
 18 Dunstons Road London SE22 0HQ
 18 Eddystone Road London Se42de
 18 Elm Park Road London SE25 6UA
 18 Falstaff House London N1 6PP
 18 Fernholme Road London SE15 3EF
 18 Freemantle Street London SE17 2JP
 18 Lucerne Street Liverpool L17 8xt
 18 Market Place, Blue Anchor Lane London SE16 3UQ
 18 Market Place, Blue Anchor Lane London SE16 3UQ
 18 Market Place, Blue Anchor Lane London SE16 3UQ
 18 Market Place, Blue Anchor Lane London SE16 3UQ
 18 Market Place, Blue Anchor Lane London SE16 3UQ
 18 Oglander Road Peckham SE15 4EL
 18 Rothesay Court, Harleyford Road London SE11 5SU
 18 Rothesay Court, Harleyford Road London SE11 5SU
 18 Rowhill Mansions Rowhill Road E5 8ED
 18 Westwick Gardens London W14 0BU
 18 5 Fountayne Rd London N15 4QL
 18a Egmont Street London SE14 5QJ
 18a Egmont Street London SE14 5QJ
 181 Wendover London SE17 2UE
 182c Lewisham Way London SE4 1UU
 185a Friern Road London SE22 0BD

186a Deptford High Street London SE8 3PR
 187 Metro Central Heights 119 Newington Causeway SE1 6BT
 188 Courtauld Road London N19 4BA
 19 Adys Rd Peckham SE15 4DX
 19 Buller Close London SE15 6UJ
 19 Clayhill Crescent London SE9 4JA
 19 Keswick House Camberwell SE9NL
 19 Sadler'S Court 30a Wilds Rents SE1 4BP
 19b Charleston Street London SE17 1NG
 19b Charleston Street London SE17 1NG
 19b Oswin Street London SE11 4TF
 191a Crowborough Road Tooting SW17 9QE
 195 Albion Road London N16 9JU
 199 Eade Road London N4 1DN
 2 Bruno Court London e8 1bf
 2 Cambridge Terrace Otley LS21 1JS
 2 Emperor Court London CT1 2HZ
 2 Falcon Point, Hopton Street London SE1 9JW
 2 Frederick Charrington House London e1 5qw
 2 Hill Farm Cottage Sudbury CO10 0QH
 2 Lady Florence Courtyard Reginald Square SE8 4RU
 2 Lily Mews London SE11 4FN
 2 Lily Mews London SE11 4FN
 2 Lily Mews London SE11 4FN
 2 Martyr Close St Albans AL12LL
 2 Oyster Court 85 Crompton Street se173bw
 2 Penshurst Rd London E9 7DX
 2 Thurlow Park Road London SE21 8JB
 2 Walsingham Road Mitcham CR4 4LN
 2 Wolsey Road Islington N1 4QH
 2 Wolsey Road Islington N1 4QH
 2a Coulgate St London SE4 2RW
 2a Southcote Road London N19 3BJ
 20 Brook Drive London SE11 4TT
 20 Faunce St London SE17 3TR
 20 Fielding St London SE17 3HD
 20 Honiton Gardens Gibbon Road SE15 2AT
 20 Lansdowne Drive London E8 3EG
 20 Lansdowne Drive London E8 3EG
 20 Lansdowne Drive London E8 3EG
 20 Princess Street London SE1 6HJ
 20 Vantrey House, Marylee Way London SE11 6TY
 20 West Square London SE11 4SN
 203 Havil St London SE5 7SB
 208 Samuel Lewis Trust Warner Road SE5 9LY
 208a Mare Street London E8 3RD
 209 Malpas Road London SE4 1BH
 209 Shopping Centre Elephant And Castle SE1 6TE
 21 College Road London SE21 7BG
 21 Huguenot Sq London SE15 3NN
 21 Lyndhurst Way Peckham SE15 5AG
 21 Overbury Road London N15 6RH
 21b Grove Park London SE5 8LH
 21b Grove Park London SE5 8LH
 211 Norwood Rd London SE24 9AG
 219 Elephant And Castle Shopping Centre London SE1 6TE
 219 Shopping Centre Elephant And Castle SE1 6TE
 219 Shopping Centre Elephant And Castle SE1 6TE
 219 Shopping Centre Elephant And Castle SE1 6TE

219 Shopping Centre Elephant And Castle SE1 6TE
 22 Burgos Grove London SE10 8LL
 22 Gerard Road Harrow HA1 2NE
 22 Hatchard Road London N22 4NH
 22 Langton Road London SW9 6UY
 22 Lansdowne Gardens London SW82EG
 22 Lockwood House, Kennington Oval London SE11 5SZ
 22 Wroxtton Road SE15 2BN
 22b Muschamp Road London SE15 4EF
 221 Gordon Road London SE15 3RT
 22-27 The Oval London E2 9DT
 225 Metro Central Heights 119 Newington Causeway SE1 6BW
 227 Ravensbourne Avenue London BR2 0BX
 23 Alberta Street London SE17 3SF
 23 Ashmore Close London SE15 5GY
 23 Fielding Street London SE17 3HE
 23 Gladstone Street London SE1 6EY
 23 Graces Mews London SE5 8JF
 23 Hamonde Close London HA8 8TG
 23 Millpond Estate West Lane SE16 4LZ
 23 Rankine House Bath Terrace SE1 6PL
 23 Rankine House Bath Terrace SE1 6PL
 23 Rankine House Bath Terrace SE1 6PL
 23c Flodden Road London SE5 9LH
 230 Metro Central Heights 119 Newington Causeway SE1 6BX
 238 Drakefell Road London SE4 2DR
 24 Brantwood House, Wyndham Estate London SE5 0XP
 24 Bridgehouse Court Blackfriars Road London SE1 8HW
 24 Citrus House Alverton Street SE8 5NP
 24 Hayles Street London SE11 4SS
 24 Leconfield House London SE5 8AY
 24 Pullens Buildings London SE17 3SJ
 24 Pullens Buildings London SE17 3SJ
 24 West Square London SE11 4SN
 2408 Strata London SE1 6EJ
 241 Camberwell New Rd, Top Flat London SE5 0TH
 245 Cannon Lane Pinner HA5 1JE
 247a Walworth Road London SE17 1RL
 25 Cobourg Rd London SE5 0HT
 25 Crystal Court London SE19 1UZ
 25 Crystal Court London SE19 1UZ
 25 Crystal Court London SE19 1UZ
 25 East Surrey Grove London SE15 6EX
 25 Elam St London SE5 9HU
 25 Fielding Street London SE17 3HE
 25 Finsbury Circus EC2M 7EE
 25 Howbury Road London SE15 3HH
 25g Bassett Road London W10 6LA
 26 Chester Court London SE5 7HS
 26 Feltham Road London CR4 2JQ
 26 Homeleigh Road London se15 3ee
 26 Oakden Street London SE11 4UG
 26 Richard Neale House London E1 2QN
 26 Waterloo Road Kings Heath Birmingham B14 7SD
 26 West Square London SE11 4SP
 26 West Square London SE11 4SP
 268 Neckinger Estate London SE16 3QB
 27 Bourneside Gardens London SE63NT
 27 Calypso Crescent Peckham SE15 6FP

27 Clarendon Walk London w11 1sn
 27 Henshaw Street London SE17 1PE
 27 Henshaw Street London SE17 1PE
 27 Hogan Court 57 Edmund Street SE5 7NF
 27 Oswin Street London
 27 Oswin Street London SE11 4TF
 27 Oswin Street London SE11 4TF
 27 Oswin Street London SE11 4TF
 27 Oswin Street London SE11 4TF
 27 Oswin Street London SE11 4TF
 27 Oswin Street London SE11 4TF
 27 Oswin Street London SE11 4TF
 27 Oswin Street London SE11 4TF
 27d Fairfield Gardens London N8 9DD
 272 High Holborn London WC1V 7EY
 274 Upland Road London Se22 0dn
 28 Albert Square London SW8 1DA
 28 Avenue Rd Stoke-On-Trent ST4 2dt
 28 Begbie Road London SE38DA
 28 C Springdale Road London N169NX
 28 Cooks Road Kennington SE17 3NF
 28 Dover Flats London SE1 5NJ
 28 Martin House Falmouth Road SE1 6QP
 28 Merryweather Court, 19 Rodney Road New Malden KT3 5TD
 28 Saltwood Grove London SE17 2HL
 28 Sutherland Square SE17 3EQ
 28 Sutherland Square SE17 3EQ
 28 Sutherland Square London X
 28 Sutherland Square London X
 28 Wollaston Close Hampton Street SE1 6SL
 29 Anerley Hill London SE19 2BA
 29 Benson House Hatfield London SE18DQ
 29 Brownswood Road London N4 2HP
 29 Camberwell Grove London SE5 8JA
 29 Innis House East Street SE17 2JN
 29 Loddiges House, Loddiges Road London E9 7PJ
 29 Ravensdon St London SE11 4AQ
 29 Redman House Lant Street SE1 1JU
 29 Rodney Place London SE17 1PP
 29 Silwood Road Sunningdale SL5 0PY
 29 Wheler House London E1 6SS
 29b Palamos Road London E10 7JF
 3 Austral Street London SE11 4SJ
 3 Austral Street London SE11 4SJ
 3 Baillie House, Horsley Road London SE17 2AT
 3 Baillie House, Horsley Road London SE17 2AT
 3 Baillie House Horsley Street SE17 2AT
 3 Crossleigh Court West Drive SW16 1RS
 3 Gladstone St. London. SE1 6EY
 3 Hathorne Close London SE15 2BY
 3 Hayles Street London SE11 4SU
 3 Hayles Street London SE11 4SU
 3 Hayles Street London SE11 4SU
 3 Hurley Crescent London SE16 6AL
 3 Kemp Court, Hartington Rd. London SW8 2BJ
 3 Portland Street London SE17 2PF
 3 Reachview Close London NW1 0TY
 3 Runacres Court Pasley Close SE17 3JZ
 3 Sister Mabel'S Way, Peckham London SE15 6UL

3 Stockham Court Rodney Road se17 1at
 3 Waterhouse Square 138 Holborn EC1N 2SW
 3a Parkhouse St London SE5 7TQ
 3a Parkhouse Street London SE5 7TQ
 30 Berryfield Rd London SE17 3QE
 30 Bisson Road Stratford, London E15 2RD
 30 Cork Tree House London SE27 0QE
 30 Langdale Close London SE17 3UF
 30 Langdale Close London SE17 3UF
 30 Lewisham Road London SE13 7QR
 30 Peacock Street London SE17 3LF
 30 Princess Street London SE1 6HJ
 30 West Square London SE11 4SP
 30 West Square London SE11 4SP
 300 Metro Central Heights 119 Newington Causeway SE1 6DB
 30-35 Peckham Road London se5 8px
 304 Latimer Road London W106QW
 306 Omega Works London E3 2GZ
 306b East Street London SE17 2SX
 31 Angelina House, Goldsmith Road Peckham SE15 5UB
 31 Briarhill Suffolk IP30 9SD
 31 Churchmead London SE5 0ET
 31 Cricketfield Road Hackney E5 8NR
 31 Oswin Street London SE11 4TF
 32 Benbow House 24 New Globe Walk SE1 9DS
 32 Dryden Court London SE114NH
 32 Garibaldi Street London SE18 1DE
 32 Greenhill Park London Nw10 9AP
 32 Henshaw Street London SE17 1PD
 32 Lanbury Road London SE15 3DB
 32 Lisford Street London SE15 5GR
 32 Marshall House Mintern Street N1 6TX
 32 Shaftesbury Court London Se5 8hq
 32 Silverburn House Lothian Rd SW9 6TY
 32 Wareham House London SW8 1az
 32a Elliotts Row London SE11 4SZ
 32b Larcom Street London SE17 1NQ
 32b Larcom Street London SE17 1NQ
 32b Larcom Street London SE17 1NQ
 320 Lexington, Fairfield Road London E3 2UE
 33 Farm Wynd Glasgow G66 3RJ
 33 Ivydale Road London SE153DR
 33, Kemsing Road London SE10 0LL
 33 Killyon Road London SW8 2XS
 33 Princess Road London NW1 8JS
 330a Brockley Road London Se4 2bt
 34 Huberd House Manciple Street London SE1 4DN
 34 Huberd House Manciple Street London SE1 4DN
 34 Oleander House 1b Glengall Road SE15 6FS
 34 Oulton Road London N15 5PY
 34 Pullens Buildings Peacock Street London SE17 3LF
 34b Merton Road London E17 9de
 3401 Styrata London SE1 6EJ
 3401 Styrata London SE1 6EJ
 35 Arrol House, Rockingham Street, London SE1 6QJ
 35 Barclay Road London E11 3DQ
 35 Buckland Court London N1 5JJ
 35 Cloudesley Road London N1 0EL
 35 Ewelme Road London SE233BQ

35 Innis House East Street SE17 2JN
 359 Wendover Thurlow Street X
 359 Wendover Thurlow Street SE17 2UR
 36 Columbia Point London SE16 7BE
 36 Mundania Road London SE22 0DZ
 36 Queen'S Row London SE17 2PX
 36a Larcom St London SE17 1NQ
 36b Amott Road London SE15 4JD
 37 Chatsworth Estate Elderfield Road E5 0BA
 37 London SE17 2EH
 37 St Georges Avenue London N7 0HB
 37a Charleston Street London SE17 1NG
 37d Oswin St. Kennington SE11 4TF
 373b Walworth Road London SE17 2al
 373b Walworth Road London SE17 2al
 38 Blenheim Rise London N15 4TJ
 38 Mary Datchelor House London SE5 8FB
 38 Peacock Street London SE17 3LF
 38, Perronet House Princess Street London SE1 6JR
 384a New Cross Road London SE14 6AG
 385-401 Holloway Road Flat 33f N7 0RY
 39 Astley House, Rowcross Street London SE1 5HT
 39 Brecon Close London CR4 1XB
 39 Burghill Road Sydenham SE26 4HJ
 39 Calderon Road London E11 4ET
 39 Gordonbrock Road London SE4 1JA
 39 Hawstead Road London SE6 4JL
 39, West Square London SE11 4S
 39, West Square London SE11 4S
 39 West Square London SE11 4SP
 4 Exon Street London SE17 2JW
 4 Freemantle Street London SE17 2JP
 4 Hayles Street London SE11 4SS
 4 Hayles Street London SE11 4SS
 4 Hayles Street London SE11 4SS
 4 Hayles Street London SE11 4SS
 4 Hayles Street London SE11 4SS
 4 Innes Lodge Inglemere Road SE23 2BD
 4 St John'S Court Devizes SN10 1BU
 4 Umbria Street, Roehampton London SW15 5DP
 4 Worth Grove Walworth SE17 2HN
 4b Springall St London SE15 2TY
 40 Acton Lane London X
 40 Grosvenor Terrace London SE5 0NP
 40 Phelp Street London SE17 2PL
 40 Saltwood Grove London SE17 2HL
 401 Tyler Court London SE17 1AX
 403 Stock House 29 Wansey Street SE17 1FE
 41 Sevenoaks Road Honor Oak Park SE4 1RF
 41 Sharsted Street London SE17 3TP
 41 West Square London SE11 4SP
 41 West Square London SE11 4SP
 41 West Square London SE11 4SP
 41 West Square London SE11 4SP
 413 Metro Central Heights 119 Newington Causeway SE1 6DX
 42 Camberwell Grove London SE5 8RE
 42 Camberwell Grove London SE5 8RE
 42 Kelvington Road London SE15 3EH
 42 Prospect Road, Southborough Tunbridge Wells TN40EN

42 West Square London SE11 4SP
 42 West Square London SE11 4SP
 42 West Square London SE11 4SP
 42 West Square London SE11 4SP
 42 West Square London SE11 4SP
 422 Lordship Lane London SE22 8NE
 424 Lordship Lane London se22 8NE
 424 Lordship Lane London se22 8NE
 427 Metro Central Heights 119 Newington Causeway SE1 6DT
 43 Aberavon Road London E3 5AR
 43 Francis Road London E106PN
 43 Larrence Avenue London NW7 4NL
 43 Wigglesworth Street London SE14 5EG
 43 Wigglesworth Street London SE14 5EG
 433 Mile Oak Road Bn41 2rd BN4 12RD
 44 Beck Road London E8 4RE
 44 Bushey Hill Rd London SE5 8QJ
 44 Bushey Hill Rd London SE5 8QJ
 44 Cleveland Street London W1T 4JT
 44 Lucas Street London SE8 4NT
 44 Smeaton Court 50 Rockingham Street SE1 6PF
 44, 9 Evan Cook Close London SE152HL
 44b London SE5 0NP
 45 Arrol House Rockingham Street SE1 6QL
 45 Dfoe Road London N16 0EH
 45 Hayes Grove London SE22 8DF
 45 Raleigh Drive London N20 0UX
 45 Tennyson House, Browning Street London X
 46 Borough Road London SE1 0AJ
 46 Calthorpe Street London WC1 X0JZ
 46 Comber House Comber Grove SE5 0LJ
 46a Riversdale Road London N5 2JT
 462 Metro Central Heights 119 Newington Causeway SE1 6DT
 462 Metro Central Heights 119 Newington Causeway SE1 6DT
 463 Metro Central Heights 119 Newington Causeway SE1 6DT
 47 Aylesbury Road London SE17 2EQ
 47 Sunnyhill Road London SW16 2UG
 47a East Street London SE17 9VE
 47a Trafalgar Avenue London SE15 6NP
 47b East Dulwich Road Se22 9an London Se22 9an
 47c Camden Hill Road London SE19 1NX
 48 Peckham Park London SE15 6TT
 48 St Stephens Road London E3 5JF
 48a Bassein Park Road London W12 9RZ
 49 Addington Square London SE5 7LB
 49 Hambledon Close Uxbridge UB8 3UD
 49 Jerrard Court, Pages Close, Sutton Coldfield Birmingham B757SZ
 49 Shenley Road London SE5 8ND
 49a Brook Drive London Se11 4tu
 5 Colnbrook Street London SE1 6EZ
 5 Colnbrook Street London SE1 6EZ
 5 Glengall Terrace London X
 5 Glengall Terrace London X
 5 Hogan Court, 57 Edmund St London SE5 7NF
 5 Melford Court London SE1 3DX
 5 Milner Court, 9 Colegrove Road London SE15 6NG
 5 Priory Road Bridgnorth Wv15 5ej
 5 Quedgeley Court London SE15 6BD
 5 Soane House, Roland Way London SE17 2JF

5 St Gabriel Walk London SE1 6FS
 5 Temple West Mews West Square SE11 4TJ
 5 Wisden House, Meadow Road London SW8 1NA
 50 Cooper Close London SE1 7QU
 50 Sutherland Square London SE17 3EE
 502a Landale House, Ardent Waterside, Lower Road London SE16 2XG
 51 Edric Road London SE14 5EN
 51 Great Marlborough Street London W1F 7JT
 51 Great Marlborough Street London W1F 7JT
 51 Great Marlborough Street London W1F 7JT
 51 Great Marlborough Street London W1F 7JT
 51 Great Marlborough Street London W1F 7JT
 51 Hatcham Park Road New Cross Gate SE14 5QE
 51 Hatcham Park Road New Cross Gate SE14 5QE
 51 Leathermarket Court London SE1 3HS
 52 Arrol House Rockingham Street London SE1 6QL
 52 Dunsmure Road London N16 5PP
 52 Graham Road London E7 1PB
 52 Hayles Buildings Elliotts Row SE11 4TD
 52 Nutcroft Road London SE15 1AF
 52 Ossory Road London SE1 5AN
 52 Ossory Road London SE1 5AN
 52 St Asaph Road London SE4 2EJ
 52 Surrey Square London SE17 2JX
 53 Bence House London SE8 5RU
 53 Monson Road London SE14 5EQ
 53 Monson Road London SE14 5eq
 53 Rokesly Avenue London N8 8NH
 54 Fleming Road London SE17 3QR
 54 Larcom Street London SE17 1NQ
 54 Norcott Road London N16 7EL
 54 Ruskin Park House London SE58tg
 54c Granville Park London SE13 7DX
 542 Samuel Lewis Trust Estate Warner Road SE5 9NB
 55 Cossall Walk London SE15 2TN
 55 Dalberg Road London SW2 1AJ
 55 Median Road London
 56 Bonnington Square, 1st Floor Flat London SW8 1TQ
 56 Crossmount House London SE5 0XB
 56 Evelyn Grove Southall UB1 2BP
 56 Frankfurt Road Herne Hill SE24 9NY
 56 Linnell Rd. Camberwell SE5 8NJ
 57 Greyhound Road London NW10 5QH
 57 Holmdene Avenue London SE24 9LD
 57 Holmdene Avenue London SE24 9LD
 57 Mistral Sceaux Gardens Estate SE5 7DS
 57 Mistral Sceaux Gardens Estate X
 57 Mornington Street London NW1 7QA
 58 Cleveleys Road London E5 9JN
 58 Harpenden Road SE27 0AF
 58 Harpenden Road SE27 0AF
 58 Harpenden Road SE27 0AF
 58 Harpenden Road London SE27 0AF
 58 Southwell Road London SE5 9PG
 59 Choumert Road Peckham SE15 4AR
 59 Kingsfield Road Watford WD19 4TP
 59 Lyndhurst Grove London SE15 5AW
 59 Stephenson House Bath Terrace SE1 6PR
 59 Stephenson House Bath Terrace SE1 6PR

59b Harlescott Rd Nunhead SE15 3DA
 6 George Mathers Road London SE11 4RU
 6 Liffie Street London SE17 3LJ
 6 London SE8 4DU
 6 Sister Mabela'S Way London SE15 6UL
 6 Sister Mabel'S Way London SE15 6UL
 6 St Peter'S House Queens Row SE17 2PT
 6 Tennyson Road Bath BA1 3BG
 6 Vaughan Road London SE5 9NZ
 6 Whitehall Gardens, Chiswick London W4 3LT
 60 Cadet Drive London SE1 5RU
 60 Carlton Mansions Holmleigh Road N16 5PX
 60 Carlton Mansions Holmleigh Road N16 5PX
 60 Gloucester Drive London N4 2LN
 60 Tyrrell Road, East Dulwich London SE22 9NE
 60 Tyrrell Road, East Dulwich London SE22 9NE
 60 Tyrrell Road London SE22 9NE
 60b Culverley Road London SE6 2LA
 603 Blackwood Apartments London SE17 1AQ
 61 Maxted Road London SE15 4LF
 62 Battersea Park Road London SW11 4JP
 62 Centrepont London SE1 5NX
 62 Midmoor Road London SW12 0ET
 63 East Dulwich Grove East Dulwich SE22 8PR
 63 Ellerdale St London SE13 7JX
 63 Ryedale se22 0ql
 63a Grosvenor Park London SE5 0NJ
 63a Grosvenor Park London se5 0nj
 63d Overhill Road London SE22 0pq
 64 Clarence Gate Gardens, Glentworth Street London NW1 6QR
 64 Henley Drive London SE1 3AR
 64 Sandhurst Drive IG3 9DE
 64 Sandhurst Drive IG3 9DE
 64 Sandhurst Drive IG3 9DE
 64 Sandhurst Drive IG3 9DE
 65 Corrance Road London SW2 5RD
 65 Swaton London E3 4ES
 65b Camberwell Road London SE5 0EZ
 65-69, County Street London SE1 4AD
 66 Northiam Street London E9 7HX
 67a Larcom Street London SE17 1NJ
 67b Kennington Park Road London SE11 4JQ
 68 Downham Road London N1 5BG
 68 Swan Mead London SE1 4SX
 68 Walters House Otto Street London SE17 3PG
 69a Friary Road London SE15 1QS
 7 Alder Close Egham TW20 0LU
 7 Brockley House Sedan Way SE17 2LW
 7 Brockley House Sedan Way SE17 2LW
 7 Dauncey House Webber Row SE1 8QS
 7 Fresco House London SE5 7FR
 7 Grafton Mews London W1T 5HY
 7 Loder Street London SE15 2LF
 7 Mcmillan House, Arica Road London SE4 2PU
 7 Oswin Street London SE11 4TF
 7 Oswin Street London SE11 4TF
 7 Oswin Street London SE11 4TF
 7 Oswin Street London SE11 4TF
 7 Oswin Street London SE11 4TF

7 Tavern Court 95 New Kent Road SE1 6RY
 7 Woden Avenue CO3 0QY
 70 Aylesbury Road London SE17 2EH
 70 Aylesbury Road London SE17 2EH
 70 Aylesbury Road London SE17 2EH
 70 Osier Crescent London N10 1QX
 70 Rattray Road London SW2 1BE
 704 Chart House 6 Burrells Wharf Square E14 3TW
 71 A First Floor Flat Rye Lane se15 5ex
 71 Claylands Road London SW8 1PJ
 71 Oxley Close London SE1 5HF
 73 Crofton Park Road London SE4 1AJ
 73 Marlborough Close London SE17 3AW
 73 Trinity Square Margate CT9 1HS
 73a Church Street London N16 0AY
 75 Fenham Road Peckham SE15 1AB
 76 Shenley Road, Camberwell Green London SE5 8NQ
 76 Shenley Road London SE5 8NQ
 76 Shenley Road London SE5 8NQ
 77-85 Newington Causeway London SE1 6BD
 77-85 Newington Causeway London SE1 6BD
 78 Barrow Road London SW16 5PG
 78 Brownhill Road London se6 2ew
 78 Glazebrook Close London SE21 8RR
 78-82 Nightingale Grove London SE13 6DZ
 79 Beauval Road London SE22 8UH
 79 Merritt Road London SE4 1DT
 79 Pilton Place London se17 1dp
 8 Anderton Close London SE5 8BU
 8 Blue Lion Place London SE1 4PU
 8 Colnbrook Street London SE1 6EZ
 8 Culand House Congreve Street SE17 1ST
 8 Dekker House Elmington Estate SE5 7QR
 8 Hampton House Hampton Street SE1 6SN
 8 Harold Estate London SE1 4HN
 8 Oakley Place London SE1 5AD
 8 Oakley Place London SE1 5AD
 8 Priestley House, Old Street London EC1V 9JN
 8 St Edmunds House London se17 2ar
 8 West Square London SE11 4SN
 8 Wilds Rents London SE1 4QG
 8a Morning Lane London X
 8b Hales Street London SE8 4RB
 8d Grove Lane Southwark SE5 8SY
 80 Arodene Road SW2 2BH
 80 Crystal Palace Park Road London SE26 6UN
 80 Hanworth House, John Ruskin St Southwark SE5 0XL
 81 Arnold Estate London SE1 2DX
 81 Knoll Crescent HA6 1HH
 81 Longhurst Lane Stockport SK6 5AH
 81a Balfour Street London SE17 1PL
 81a Balfour Street London SE17 1PL
 81a Balfour Street London SE17 1PL
 81b Lytham Street Elephant & Castle SE17 2NN
 8-16 Pocock Street London SE1 0BW
 82 Balls Pond Road, Flat 1 London N1 4AJ
 82b Peckham Hill Street, Peckham London SE15 5JT
 83 Aveling Park Road Walthamstow E17 4NS
 83 St Marks Road, Hanwell, London London w7 2pn

83a Balfour Street London SE17 1PL
 83a Balfour Street London SE17 1PL
 84 Kitley Gardens London SE19 2RY
 84 Kitley Gardens London SE19 2RY
 84 Lowth Road London SE5 9EX
 84 Lowth Road London SE5 9EX
 84 Metro Central Heights 119 Newington Causeway SE1 6BB
 84a Stondon Park, Flat A London SE231JS
 85 Chadwick Road Peckham SE15 4PU
 85 Pilton Place, Off King & Queen Street Walworth SE171DP
 85c Balfour Street London SE17 1PB
 86 Allison Road 86 Allison Road N8 0AS
 86 Scylla Road London SE15 3PB
 86 Scylla Road London SE15 3PB
 86 Scylla Road SE15 3PB
 86c Hackford Road London SW9 0RG
 86f Talfourd Road London SE15 5NZ
 87 Balfour Street London SE17 1PB
 87 Calton Avenue London SE21 7DF
 87 Orange Grove London E11 4LP
 87b Wyndham Road Camberwell SE5 0UB
 88 Sewardstone Road London E2 9JG
 89 Peabody Cottages, Rosendale Road London SE24 9DP
 9 Birley Rise Sheffield S6 1hq
 9 Blanchdowne Denmark Hill SE5 8HT
 9 Bloom Park Road, Sw6 7bg London SW6 7BG
 9 Choumert Square London SE15 4RE
 9 Crewys Road Peckham SE152BJ
 9 Dowlas Street London SE5 7TA
 9 Ingran Street Huntingdon PE29 3QG
 9 Peace Court London SE1 5TR
 9 Playfield Crescent London SE23 2ET
 9 Rockley Road London W14 0BT
 9 Sanford Walk London se14 6nb
 9 St Georges Buildings St Georges Road SE1 6EP
 9 Steedman Street Flat 601 SE17 3BA
 9 William Evans Hse London SE8 5AU
 9a Musgrove Road London SE14 5PP
 90 Crofton Road London SE5 8NA
 90 London Road Southbank Technopark SE1 6LN
 91 Rodney Road London SE17 1RF
 91b Penton Place London SE17 3JR
 92 Stanswood Gardens London SE5 7SR
 92a Palace Road London SW2 3JZ
 92a Walworth Road London SE1 6SW
 93 Old Ford Rd London E2 9JR
 94 Fairfoot Road London E3 4EH
 94 Iliffe Street London SE17 3LL
 94 New Cross Road London SE14 5BA
 95 Lynmouth Road London E17 8AG
 96 Crampton St London E8 3RL
 96 Crofton Road London SE5 8NA
 96 Leverson Street London SW16 6DE
 96b Meeting House Lane London SE15 2TT
 97 Bravington Road London X
 97 Coleman Road London SE5 7TF
 97 E Denmark Hill Camberwell se58aa
 99 Astbury Road London SE15 2NP
 99b Forest Road London E8 3BH

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	Elephant & Castle Properties CO Ltd	Reg. Number	16/AP/4458
Application Type	Full Planning Application	Case Number	TP/1512-Q
Recommendation	Grant subject to Legal Agreement, GLA and SoS		

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.

At: SHOPPING CENTRE SITE, ELEPHANT AND CASTLE, 26, 28, 30 AND 32 NEW KENT ROAD, ARCHES 6 AND 7 ELEPHANT ROAD, AND LONDON COLLEGE OF COMMUNICATIONS SITE, LONDON SE1

In accordance with application received on 31/10/2016 comprising the following plans and documents:

Plans

935_00_07_PLANNING		-
Site Location Plans		
935_00_07_001	Site Location Plan - Existing	P2
935_00_07_002	Site Location Plan - Proposed	P2
935_00_07_003	Site - Roof Plan	P1
935_00_07_004	Site - Ground Plan	P2
935_00_07_005	Site - Basement Plan B1	P1
935_00_07_006	Site - Basement Plan B2 & LUL Box	P1
935_00_07_010	Site - Key Plan	P1
GA Plans - Existing East Site		
935_01_07_050	Existing East Site - Roof Plan	P1
GA Plans - Existing West Site		
935_02_07_050	Existing West Site - Roof Plan	P1
GA Elevations - Existing East Site		
935_01_07_060	Existing East Site - North Elevation	P1
935_01_07_061	Existing East Site - East Elevation	P1
935_01_07_062	Existing East Site - South Elevation	P1
935_01_07_063	Existing East Site - West Elevation	P1
935_01_07_064	Existing East Site - London Coronet Theatre	P1
GA Elevations - Existing West Site		

935_02_07_020	Existing West Site - East Elevation	P1
935_02_07_060	Existing West Site - North Elevation	P1
935_02_07_061	Existing West Site - East Elevation	P1
935_02_07_062	Existing West Site - South Elevation	P1
935_02_07_063	Existing West Site - West Elevation	P1
GA Plans - Proposed East Site		
935_01_07_97	East Site - Over Bridge & NLSB Level	P1
935_01_07_98	East Site - Lower Basement Plan	P3
935_01_07_99	East Site - Basement Mezzanine Plan	P2
935_01_07_100	East Site - Ground Floor Plan	P2
935_01_07_101	East Site - First Floor Plan	P2
935_01_07_102	East Site - Second Floor Plan	P1
935_01_07_103	East Site - Third Floor Plan	P1
935_01_07_104	East Site - Fourth Floor Plan	P1
935_01_07_105	East Site - Fifth Floor Plan	P1
935_01_07_106	East Site - Sixth Floor Plan	P1
935_01_07_107	East Site - Seventh Floor Plan	P1
935_01_07_108	East Site - Eighth Floor Plan	P1
935_01_07_109	East Site - Ninth Floor Plan	P1
935_01_07_110	East Site - Tenth Floor Plan	P1
935_01_07_111	East Site - Eleventh Floor Plan	P1
935_01_07_112	East Site - Twelfth to Fifteenth Floor Plan	P1
935_01_07_116	East Site - Sixteenth Floor Plan	P1
935_01_07_117	East Site - Seventeenth to Nineteenth Floor Plan	P1
935_01_07_120	East Site - Twentieth Floor Plan	P1
935_01_07_121	East Site - Twenty-first Floor Plan	P1
935_01_07_122	East Site - Twenty-Second Floor Plan	P1
935_01_07_128	East Site - Twenty-Eight Floor Plan	P1
935_01_07_129	East Site - Twenty-Ninth Floor Plan	P1
935_01_07_134	East Site - Thirtieth Floor Plan (plant)	P1
935_01_07_135	East Site - Roof Plan	P1
GA Plans - Proposed West Site		
935_02_07_99	West Site - Basement Plan	P1
935_02_07_100	West Site - Ground Floor Plan	P2
935_02_07_100UG	West Site - Upper Ground Floor Plan	P1
935_02_07_101	West Site - First Floor Plan	P1
935_02_07_102	West Site - Second Floor Plan	P1
935_02_07_103	West Site - Third Floor Plan	P1
935_02_07_104	West Site - Fourth Floor Plan	P1
935_02_07_105	West Site - Fifth Floor Plan	P1
935_02_07_106	West Site - Sixth Floor Plan	P1
935_02_07_107	West Site - Seventh Floor Plan	P1
935_02_07_108	West Site - Eighth to Ninth Floor Plan	P1
935_02_07_109	-	

935_02_07_110	West Site - Tenth to Eleventh Floor Plan	P1
935_02_07_111	-	
935_02_07_112	West Site - Twelfth to Fourteenth Floor Plan	P1
935_02_07_113	-	
935_02_07_114	-	
935_02_07_115	West Site - Fifteenth Floor Plan	P1
935_02_07_116	West Site - Sixteenth Floor Plan	P1
935_02_07_118	West Site - Eighteenth Floor Plan	P1
935_02_07_119	West Site - Nineteenth Floor Plan	P1
935_02_07_120	West Site - Twentieth to Twenty-First Floor Plan	P1
935_02_07_122	West Site - Twenty-Second Floor Plan	P1
935_02_07_123	West Site - Twenty-Third to Twenty-fourth Floor Plan	P1
935_02_07_125	West Site - Twenty-Fifth to Twenty-Sixth Floor Plan	P1
935_02_07_127	West Site - Twenty-Seventh Floor Plan	P1
935_02_07_128	West Site - Twenty-Eighth to Thirty-Third Floor Plan	P1
935_02_07_134	West Site - Thirty-Fourth Floor Plan	P1
935_02_07_135	West Site - Roof Plan	P1
GA Elevations - Site		
935_00_07_200	Site - North Elevation	P2
GA Elevations - East Site		
935_01_07_210	East Site - Peninsular Elevation	P1
935_01_07_211	East Site - North Elevation	P1
935_01_07_212	East Site - East Elevation	P1
935_01_07_213	East Site - South Elevation	P1
935_01_07_214	East Site - West Elevation	P1
935_01_07_215	East Site - Station Route Elevation 1	P1
935_01_07_216	East Site - Station Route Elevation 2	P2
935_01_07_217	East Site - Park Route Elevation 1	P1
935_01_07_218	East Site - Park Route Elevation 2	P1
GA Elevations - West Site		
935_02_07_210	West Site - Elephant and Castle	P2
935_02_07_211	West Site - St George's Road (North)	P2
935_02_07_212	West Site - South Elevation	P2
935_02_07_213	West Site - Oswin Street Elevation (West)	P1
935_02_07_214	West Site - Pastor Street Elevation (West)	P1
935_02_07_215	West Site - Pastor Street Elevation (East)	P1
935_02_07_216	West Site - Link Street Elevations	P1
GA Sections - Site		
935_00_07_300	Site Section AA	P2
935_00_07_301	Site Section BB	P1
935_00_07_302	Site Section CC	P1
GA Sections - East Site		
935_01_07_310	East Site - Section AA	P2
935_01_07_311	East Site - Section BB	P1

935_01_07_312	East Site - Section CC	P1
GA Sections - West Site		
935_02_07_310	West Site - Section AA	P1
935_02_07_311	West Site - Section BB	P1
935_02_07_312	West Site - Section CC	P1
GA Bay Studies - East Site		
935_01_07_501	East Site - Bay Study - Building E3, Tower 3	P1
935_01_07_502	East Site - Bay Study - Building E3	P1
935_01_07_503	East Site - Bay Study - Typical Tower	P1
935_01_07_504	East Site - Bay Study - Typical Tower	P1
935_01_07_505	East Site - Bay Study - Building E2	P1
935_01_07_506	East Site - Bay Study - Building E2	P1
935_01_07_507	East Site - Bay Study - Building E2	P1
935_01_07_508	East Site - Bay Study - Building E4	P1
935_01_07_509	East Site - Bay Study - Footbridge	P1
935_01_07_510	-	
935_01_07_511	East Site - Bay Study - UAL	P1
935_01_07_512	East Site - Bay Study - UAL	P1
935_01_07_513	East Site - Bay Study - UAL	P1
935_01_07_514	East Site - Bay Study - UAL	P1
935_01_07_515	East Site - Bay Study - UAL	P1
935_01_07_516	East Site - Bay Study - UAL	P1
935_01_07_517	East Site - Bay Study - UAL	P1
935_01_07_518	East Site - Bay Study - UAL	P1
GA Bay Studies - West Site		
935_02_07_500	West Site - Bay Study - Mansion Block	P1
935_02_07_501	West Site - Bay Study - Mansion Block	P1
935_02_07_502	West Site - Bay Study - Mansion Block	P1
935_02_07_503	West Site - Bay Study - Mansion Block	P1
935_02_07_504	West Site - Bay Study - Mansion Block	P1
935_02_07_505	West Site - Bay Study - W2 Tower 2	P1
935_02_07_506	West Site - Bay Study - W2 Tower 3	P1
935_02_07_507	West Site - Bay Study - W2 Tower 4	P1
935_02_07_508	West Site - Bay Study - Music Venue	P2
935_02_07_509	West Site - Bay Study - Music Venue	P2
935_00_Reports		
935_00_DAS	Design & Access Statement	P1
935_00_Schedule - Supplementary Information		
935_01_2QA_Residential Unit Types Schedule		12.06.2017
935_02_2QA_Residential Unit Types Schedule		12.06.2017
935_02_2QA_Site Area Schedule_Elephant & Castle Total		15.06.2017
935_02_2QA_Site Area Schedule_East Site		15.06.2017

	7
935_02_2QA_Site Area Schedule_West Site	15.06.2017

935_00_Sketches - Supplementary Information

935_01_SK093	East Site - Detail Flat Layouts	1:50	A1	P1
935_01_SK094	East Site - Detail Flat Layouts	1:50	A1	P1
935_02_SK138	West Site - Detail Flat Layouts	1:50	A1	P1
935_02_SK139	West Site - Detail Flat Layouts	1:50	A1	P1
935_02_SK140	West Site - Detail Flat Layouts	1:50	A1	P1
935_02_SK141	West Site - Detail Flat Layouts	1:50	A1	P1

Key Plan	TOWN617(03)3001
East Site: Ground Level	TOWN617(03)3002
West Site: Ground Level	TOWN617(03)3003
East Site: E3 Podium	TOWN617(03)3102
East Site: E2 Podium	TOWN617(03)3103
West Site: W2 Podium	TOWN617(03)3104
West Site: W3 Building 1,2,3 Podium	TOWN617(03)3105
West Site: W1 Tower 1 - 7th Floor	TOWN617(03)3106
West Site: Tower 1 and Tower 2 - 10th Floor	TOWN617(03)3107
West Site: W2 , Tower 2 - 12th Floor	TOWN617(03)3108
West Site: W1 - 15th Floor	TOWN617(03)3109
West Site: W2 - 18th Floor	TOWN617(03)3110
West Site: W2 20th Floor	TOWN617(03)3111
West Site: W2 - 22nd Floor	TOWN617(03)3112
West Site: W2, Tower 3 - 27th Floor	TOWN617(03)3113

Documents

Design and Access Statement prepared by Allies & Morrison, Planning Statement including Draft Section 106 Heads of Terms prepared by DP9, Retail Assessment prepared by DP9, Regeneration Statement prepared by Regeneris, Statement of Community Involvement (SCI) prepared by Carvil Ventures, Transport Assessment prepared by WSP | Parsons Brinckerhoff, Draft Interim Framework Travel Plan prepared by WSP | Parsons Brinckerhoff, Delivery and Servicing Plan prepared by WSP | Parsons Brinckerhoff, Construction Management Plan prepared by MACE, Waste Management Strategy prepared by WSP | Parsons Brinckerhoff, Arboricultural Impact Assessment prepared by Waterman, Affordable Housing Statement prepared by DS2, Energy Statement prepared by Hoare Lea, Sustainability Strategy including BREEAM Pre-assessment prepared by Hoare Lea, Equalities Statement prepared by Quod, Rapid Health Impact Assessment prepared by Ricardo, Internal Daylight and Sunlight Report prepared by Hoare Lea, Environmental Statement coordinated by Waterman, Financial viability assessment executive summary and full appraisal prepared by DS2; Updated bat survey report, Transport Assessment Addendum, Affordable Housing Addendum, CGIs showing relationship with Metropolitan Tabernacle, Overshadowing Assessments September 2016 and 26th July 2017, Acoustic Design Corsica Studios affecting South East block revision 03, Noise Emissions Corsica Studios Briefing Note 10th April 2017, Corsica Studios and Interim Construction Phase Technical Note, Design and Access Statement Addendum, Equalities Statement Addendum, Figure 14.1: View of the Model in the Wind Tunnel, Response to waste management comments, Letter from Watermans dated 19th June 2017 regarding EIA implications of the proposed amendments, Elephant and Castle commentary on sections through the site including figures 1 and 2 (for archaeology), Basement Impact Assessment, larger details of townscape view assessment point 23A.1, Daylight / sunlight addendum, Sustainability document revision B, Overshadowing Assessments dated 14th December 2017 (for the proposed communal gardens).

Letter from DP9 dated 13th February 2018 updating the proposals, Transport technical note for D2 land use on west site dated February 2018, Financial Viability Assessment – executive summary update, OEQS additional information dated February 2018, letter from Waterman dated 9th February 2018 (EIA update letter), Transport Statement Appendix T (LCC survey data), Statement of Community Involvement Addendum dated June 2018, update letter from DP9 dated 15th June 2018, Development Appraisals dated 13th June 2018.

Definitions

- a) "Phasing Plan" means the two phases of comprehensive redevelopment as assessed within the Environmental Statement (September 2016) and subsequent letter from Watermans dated 19th June 2017 regarding EIA implications of the proposed amendments. For the avoidance of doubt, a Phasing Plan is to be submitted pursuant to condition 3.

Subject to the following conditions:

Time limit for implementing this permission and the approved plans

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

935_00_07_PLANNING		-
Site Location Plans		
935_00_07_001	Site Location Plan - Existing	P2
935_00_07_002	Site Location Plan - Proposed	P2
935_00_07_003	Site - Roof Plan	P1
935_00_07_004	Site - Ground Plan	P2
935_00_07_005	Site - Basement Plan B1	P1
935_00_07_006	Site - Basement Plan B2 & LUL Box	P1
935_00_07_010	Site - Key Plan	P1
GA Plans - Existing East Site		
935_01_07_050	Existing East Site - Roof Plan	P1
GA Plans - Existing West Site		
935_02_07_050	Existing West Site - Roof Plan	P1
GA Elevations - Existing East Site		
935_01_07_060	Existing East Site - North Elevation	P1
935_01_07_061	Existing East Site - East Elevation	P1
935_01_07_062	Existing East Site - South Elevation	P1
935_01_07_063	Existing East Site - West Elevation	P1
935_01_07_064	Existing East Site - London Coronet Theatre	P1
GA Elevations - Existing West Site		
935_02_07_020	Existing West Site - East Elevation	P1
935_02_07_060	Existing West Site - North Elevation	P1
935_02_07_061	Existing West Site - East Elevation	P1
935_02_07_062	Existing West Site - South Elevation	P1
935_02_07_063	Existing West Site - West Elevation	P1
GA Plans - Proposed East Site		
935_01_07_97	East Site - Over Bridge & NLSB Level	P1
935_01_07_98	East Site - Lower Basement Plan	P3
935_01_07_99	East Site - Basement Mezzanine Plan	P2
935_01_07_100	East Site - Ground Floor Plan	P2
935_01_07_101	East Site - First Floor Plan	P2
935_01_07_102	East Site - Second Floor Plan	P1
935_01_07_103	East Site - Third Floor Plan	P1

935_01_07_104	East Site - Fourth Floor Plan	P1
935_01_07_105	East Site - Fifth Floor Plan	P1
935_01_07_106	East Site - Sixth Floor Plan	P1
935_01_07_107	East Site - Seventh Floor Plan	P1
935_01_07_108	East Site - Eighth Floor Plan	P1
935_01_07_109	East Site - Ninth Floor Plan	P1
935_01_07_110	East Site - Tenth Floor Plan	P1
935_01_07_111	East Site - Eleventh Floor Plan	P1
935_01_07_112	East Site - Twelfth to Fifteenth Floor Plan	P1
935_01_07_116	East Site - Sixteenth Floor Plan	P1
935_01_07_117	East Site - Seventeenth to Nineteenth Floor Plan	P1
935_01_07_120	East Site - Twentieth Floor Plan	P1
935_01_07_121	East Site - Twenty-first Floor Plan	P1
935_01_07_122	East Site - Twenty-Second Floor Plan	P1
935_01_07_128	East Site - Twenty-Eight Floor Plan	P1
935_01_07_129	East Site - Twenty-Ninth Floor Plan	P1
935_01_07_134	East Site - Thirtieth Floor Plan (plant)	P1
935_01_07_135	East Site - Roof Plan	P1
GA Plans - Proposed West Site		
935_02_07_99	West Site - Basement Plan	P1
935_02_07_100	West Site - Ground Floor Plan	P2
935_02_07_100UG	West Site - Upper Ground Floor Plan	P1
935_02_07_101	West Site - First Floor Plan	P1
935_02_07_102	West Site - Second Floor Plan	P1
935_02_07_103	West Site - Third Floor Plan	P1
935_02_07_104	West Site - Fourth Floor Plan	P1
935_02_07_105	West Site - Fifth Floor Plan	P1
935_02_07_106	West Site - Sixth Floor Plan	P1
935_02_07_107	West Site - Seventh Floor Plan	P1
935_02_07_108	West Site - Eighth to Ninth Floor Plan	P1
935_02_07_109	-	
935_02_07_110	West Site - Tenth to Eleventh Floor Plan	P1
935_02_07_111	-	
935_02_07_112	West Site - Twelfth to Fourteenth Floor Plan	P1
935_02_07_113	-	
935_02_07_114	-	
935_02_07_115	West Site - Fifteenth Floor Plan	P1
935_02_07_116	West Site - Sixteenth Floor Plan	P1
935_02_07_118	West Site - Eighteenth Floor Plan	P1
935_02_07_119	West Site - Nineteenth Floor Plan	P1
935_02_07_120	West Site - Twentieth to Twenty-First Floor Plan	P1
935_02_07_122	West Site - Twenty-Second Floor Plan	P1
935_02_07_123	West Site - Twenty-Third to Twenty-fourth Floor Plan	P1
935_02_07_125	West Site - Twenty-Fifth to Twenty-Sixth Floor Plan	P1

935_02_07_127	West Site - Twenty-Seventh Floor Plan	P1
935_02_07_128	West Site - Twenty-Eighth to Thirty-Third Floor Plan	P1
935_02_07_134	West Site - Thirty-Fourth Floor Plan	P1
935_02_07_135	West Site - Roof Plan	P1
GA Elevations - Site		
935_00_07_200	Site - North Elevation	P2
GA Elevations - East Site		
935_01_07_210	East Site - Peninsular Elevation	P1
935_01_07_211	East Site - North Elevation	P1
935_01_07_212	East Site - East Elevation	P1
935_01_07_213	East Site - South Elevation	P1
935_01_07_214	East Site - West Elevation	P1
935_01_07_215	East Site - Station Route Elevation 1	P1
935_01_07_216	East Site - Station Route Elevation 2	P2
935_01_07_217	East Site - Park Route Elevation 1	P1
935_01_07_218	East Site - Park Route Elevation 2	P1
GA Elevations - West Site		
935_02_07_210	West Site - Elephant and Castle	P2
935_02_07_211	West Site - St George's Road (North)	P2
935_02_07_212	West Site - South Elevation	P2
935_02_07_213	West Site - Oswin Street Elevation (West)	P1
935_02_07_214	West Site - Pastor Street Elevation (West)	P1
935_02_07_215	West Site - Pastor Street Elevation (East)	P1
935_02_07_216	West Site - Link Street Elevations	P1
GA Sections - Site		
935_00_07_300	Site Section AA	P2
935_00_07_301	Site Section BB	P1
935_00_07_302	Site Section CC	P1
GA Sections - East Site		
935_01_07_310	East Site - Section AA	P2
935_01_07_311	East Site - Section BB	P1
935_01_07_312	East Site - Section CC	P1
GA Sections - West Site		
935_02_07_310	West Site - Section AA	P1
935_02_07_311	West Site - Section BB	P1
935_02_07_312	West Site - Section CC	P1
GA Bay Studies - East Site		
935_01_07_501	East Site - Bay Study - Building E3, Tower 3	P1
935_01_07_502	East Site - Bay Study - Building E3	P1
935_01_07_503	East Site - Bay Study - Typical Tower	P1
935_01_07_504	East Site - Bay Study - Typical Tower	P1
935_01_07_505	East Site - Bay Study - Building E2	P1
935_01_07_506	East Site - Bay Study - Building E2	P1
935_01_07_507	East Site - Bay Study - Building E2	P1

935_01_07_508	East Site - Bay Study - Building E4	P1
935_01_07_509	East Site - Bay Study - Footbridge	P1
935_01_07_510	-	
935_01_07_511	East Site - Bay Study - UAL	P1
935_01_07_512	East Site - Bay Study - UAL	P1
935_01_07_513	East Site - Bay Study - UAL	P1
935_01_07_514	East Site - Bay Study - UAL	P1
935_01_07_515	East Site - Bay Study - UAL	P1
935_01_07_516	East Site - Bay Study - UAL	P1
935_01_07_517	East Site - Bay Study - UAL	P1
935_01_07_518	East Site - Bay Study - UAL	P1
GA Bay Studies - West Site		
935_02_07_500	West Site - Bay Study - Mansion Block	P1
935_02_07_501	West Site - Bay Study - Mansion Block	P1
935_02_07_502	West Site - Bay Study - Mansion Block	P1
935_02_07_503	West Site - Bay Study - Mansion Block	P1
935_02_07_504	West Site - Bay Study - Mansion Block	P1
935_02_07_505	West Site - Bay Study - W2 Tower 2	P1
935_02_07_506	West Site - Bay Study - W2 Tower 3	P1
935_02_07_507	West Site - Bay Study - W2 Tower 4	P1
935_02_07_508	West Site - Bay Study - Music Venue	P2
935_02_07_509	West Site - Bay Study - Music Venue	P2
935_00_Reports		
935_00_DAS	Design & Access Statement	P1

935_00_Schedule - Supplementary Information

935_01_2QA_Residential Unit Types Schedule	12.06.2017
935_02_2QA_Residential Unit Types Schedule	12.06.2017
935_02_2QA_Site Area Schedule_Elephant & Castle Total	15.06.2017
935_02_2QA_Site Area Schedule_East Site	15.06.2017
935_02_2QA_Site Area Schedule_West Site	15.06.2017

935_00_Sketches - Supplementary Information

935_01_SK093	East Site - Detail Flat Layouts	1:50	A1	P1
935_01_SK094	East Site - Detail Flat Layouts	1:50	A1	P1
935_02_SK138	West Site - Detail Flat Layouts	1:50	A1	P1
935_02_SK139	West Site - Detail Flat Layouts	1:50	A1	P1
935_02_SK140	West Site - Detail Flat Layouts	1:50	A1	P1
935_02_SK141	West Site - Detail Flat Layouts	1:50	A1	P1

Key Plan	TOWN617(03)3001
East Site: Ground Level	TOWN617(03)3002
West Site: Ground Level	TOWN617(03)3003

East Site: E3 Podium	TOWN617(03)3102
East Site: E2 Podium	TOWN617(03)3103
West Site: W2 Podium	TOWN617(03)3104
West Site: W3 Building 1,2,3 Podium	TOWN617(03)3105
West Site: W1 Tower 1 - 7th Floor	TOWN617(03)3106
West Site: Tower 1 and Tower 2 - 10th Floor	TOWN617(03)3107
West Site: W2 , Tower 2 - 12th Floor	TOWN617(03)3108
West Site: W1 - 15th Floor	TOWN617(03)3109
West Site: W2 - 18th Floor	TOWN617(03)3110
West Site: W2 20th Floor	TOWN617(03)3111
West Site: W2 - 22nd Floor	TOWN617(03)3112
West Site: W2, Tower 3 - 27th Floor	TOWN617(03)3113

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 five years from the date of this permission.

Reason:

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

Site wide conditions

3. The development hereby permitted shall be carried out in accordance with a Phasing Plan to be submitted to and approved in writing by the Local Planning Authority prior to works commencing. The Phasing Plan may be amended from time to time, subject to obtaining the prior written approval of the Local Planning Authority (in consultation with the GLA and Transport for London), and providing the submission of any updated Phasing Plan shall comply with the requirements of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.

Reason:

To ensure that any proposed new and / or different environmental effects relating to any proposed changes to the phasing of the Development have been properly assessed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

4. Notwithstanding the provisions of Part 16 and 25 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted without the prior written consent of the Local Planning Authority.

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.

East site conditions

Pre-commencement condition(s) - unless otherwise stated, 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 the east site works granted by this permission is commenced.

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.

i) The Phase 1 (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.

ii) Any 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 will 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 works 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 works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed shall be submitted to and approved in writing by the Local Planning Authority.

d) In the event that potential 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 off-site 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. Tree Protection

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

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.

b) A detailed Arboricultural Method Statement showing 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, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

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.

7. **Archaeological Implement Programme**
Before any below ground work hereby authorised begins (excluding demolition), the applicant shall secure the implementation of a programme of archaeological work 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 archaeological operations are undertaken to an acceptable standard and that legitimate archaeological interest in the site is satisfied 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.

8. **Archaeological Evaluation**
Before any below ground work hereby authorised begins (excluding demolition), the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented 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.

9. **Archaeological Mitigation**
Before any below ground work hereby authorised begins (excluding demolition), the applicant shall secure the implementation of a programme of archaeological mitigation works 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 mitigation 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.

10. **Archaeological Foundation and Basement Design**
Before any below ground work hereby authorised begins (excluding demolition), a detailed scheme showing the complete scope and arrangement of the basement and foundation design and all ground works 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 order that details of the foundations, ground works and all below ground impacts of the proposed development are detailed and accord with the programme of archaeological mitigation works to ensure the preservation of archaeological remains by record and in situ 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.

11. **Building Recording**
No demolition or development shall take place before the applicant, or his/her agent or successors in title, has secured the implementation of a programme of building recording analysis (to Historic England Level 3) of the Coronet Theatre and the Elephant and Castle Shopping Centre. Details shall be submitted to and approved in writing by the Local Planning Authority prior to demolition/development commencing. The recording analysis shall be carried out by a professional archaeological/building recording consultant or organisation in accordance with the approved details.

Reason:

In order that the archaeological operations are undertaken to a suitable standard as to the details of the programme of works for the archaeological building recording in accordance with PPS5, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policy 3.19 Archaeology of the Southwark Plan 2007.

12. **Precautionary bat survey**
If more than two seasons pass between the most recent bat survey for the site and the commencement of demolition and/or tree works, an updated bat survey must be undertaken immediately prior to demolition or tree works by a licensed bat worker. Evidence that the survey has been undertaken shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of demolition and/or tree works.

Reason:

In accordance with saved policy 3.28 'Biodiversity' of the Southwark Plan (2007).

13. **Groundwater investigations**
No below ground works shall commence (excluding demolition) until suitable investigations are undertaken to determine the ground and groundwater conditions (including levels) at the site and an updated basement impact assessment is submitted to and approved in writing by the Local Planning Authority. This should include groundwater mitigation measures as required, with the measures constructed in accordance with the approved details.

Reason:

To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in accordance with section 5.3.3 of the Southwark Strategic Flood Risk Assessment (2008).

14. **Surface water drainage**
No below ground works shall commence (excluding demolition) until details of a surface water drainage strategy incorporating sustainable drainage principles to achieve a reduction in surface water run-off rates from the site to a minimum of 50% of that for the existing site during a 1% Annual Exceedance Probability (AEP) event, has been submitted to and approved in writing by Local Planning Authority. The site drainage must be constructed in accordance with the approved details.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with saved policy 3.9 Water of the Southwark Plan, Strategic policy 13 of the Core Strategy (2011) and guidance in the Sustainable Design and Construction SPD (2009).

15. **Impact study for water infrastructure capacity**
Development shall not be commenced (excluding demolition) until impact studies of the existing water supply infrastructure have been submitted to and approved in writing by the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point.

Reason:

To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

16. **Piling method statement**
No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason:

The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

17. **Prior to the commencement of the development on the east site, a strategy for ongoing engagement with the existing businesses and charities within the site detailing how they will be kept informed of the progression of the development, measures to notify existing businesses and charities at least 6 months before the closure of the shopping centre, and the setting up of a trader panel at least 6 months prior to the closure of the shopping centre shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details thereby approved and the measures implemented at least 6 months before the shopping centre closes.**

Reason:

To ensure that existing businesses are informed of the likely impacts upon them in a timely manner, and in recognition of the equality impacts arising from the proposed development.

Commencement of works above grade - the details required to be submitted for approval by the conditions 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, excluding demolition.

18. Detailed construction drawings: East Site

Prior to the commencement of works above grade (excluding cores) typical section detail-drawings at a scale of 1:5 or 1:10 through the following elements of the approved buildings:

- the facades;
- the shop fronts;
- heads, cills and jambs of openings;
- parapets;
- roof edges for

i) Plot E1 LUL Station and Shopping Centre;

ii) E2 residential tower and Shopping Centre;

iii) E3 residential towers and Shopping Centre;

iv) E4 Shopping Centre (including measures to improve the appearance of the first floor of the shopping centre facing Elephant and Castle and Walworth Road)

and showing the re-use of the Elephant sculpture which is displayed at the front of the existing shopping centre, shall be submitted to the Local Planning Authority for approval in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in the interest of the special architectural or historic qualities of the listed building in accordance with the NPPF (2012), Strategic policy SP12 – Design & Conservation - of the Core Strategy (2011) and saved policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

19. Detailed Construction Drawings: Education Building

Prior to the commencement of works above grade (excluding cores) typical section detail drawings at a scale of 1:5/10 through the following elements of the approved education building:

- the facades;
- the shop fronts;
- heads, cills and jambs of all openings;
- parapets;
- roof edges;

shall be submitted to the Local Planning Authority for approval in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in the interest of the special architectural or historic qualities of the listed building in accordance with the NPPF (2012), Strategic policy SP12 – Design & Conservation - of the Core Strategy (2011) and saved policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

20. Sample panels: East Site

Sample panels of the external facing materials for the east site buildings including:

i) E1 LUL Station and Shopping Centre;

ii) E2 residential tower and Shopping Centre;

iii) E3 residential towers and Shopping Centre; and

iv) E4 Shopping Centre

to be used in the carrying out of this permission shall be presented on site and a detailed schedule of materials submitted to the Local Planning Authority for approval in writing before any works thereby affected are carried out;

the development shall not be carried out otherwise than in accordance with any such approval given. These samples must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF (2012), Policy SP12, Design & Conservation of the Core Strategy 2011 and saved policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

21. Sample panels: Education Building

Sample panels of the external facing materials for the education building to be used in the carrying out of this permission shall be presented on site and a detailed schedule of materials submitted to the Local Planning Authority for approval in writing before any works thereby affected are carried out; the development shall not be carried out otherwise than in accordance with any such approval given. These samples must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF (2012), Policy SP12, Design & Conservation of the Core Strategy 2011 and saved policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

22. Mock-up: Residential towers

Full-scale mock-ups of the façades of the east site residential towers E2 and E3 to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority before any works thereby affected are carried out; the development shall not be carried out otherwise than in accordance with any such approval given. These mock-ups must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF (2012), Strategic policy SP12 – Design & Conservation - of the Core Strategy (2011) and saved policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

23. Mock-up: Education Building

A full-scale mock-up of the façade of the education building to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority before any above ground work in connection with this permission is carried out; the development shall not be carried out otherwise than in accordance with any such approval given. The mock-up must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF (2012), Strategic policy SP12 – Design & Conservation - of the Core Strategy (2011) and saved policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

24. Green roof

Before any above grade work hereby authorised begins to plot E1, details of the green roof to plot E1 shall be submitted to and approved in writing by the Local Planning Authority. The green roof shall be:

- biodiversity based with extensive substrate base (depth 80-150mm);
- laid out in accordance with agreed plans; and
- planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

The green roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. It shall be provided in accordance with the details so approved and shall be maintained as such thereafter.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 2.18, 5.3, 5.10, and 511 of the London Plan 2011, saved policy

3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

25. Basement access – detailed design

Before any above grade work hereby authorised begins, detailed plans at an appropriate scale (and relevant supporting documentation) of the New Kent Road access to the basement servicing yard will be submitted and approved in writing by the local planning authority (in consultation with Transport for London). Submitted details should clearly set out how the immediate public realm and entrance to the basement servicing area can be designed to accommodate the efficient arrival/exit of vehicles, how the access will be monitored, managed and made secure and how the risk of pedestrian and vehicular conflicts will be minimised such that the basement access point will operate safely, securely and efficiently. The development shall be carried out in accordance with the approved details.

Reason

In order that the applicant can demonstrate that physical design measures and management controls have been implemented to ensure the safe operation of the servicing yard and forecourt, whilst also ensuring a high quality of public realm, to minimise conflict between pedestrians and vehicular traffic in accordance with Saved Policies 5.2 Transport Impacts and 5.3 Walking and Cycling of the Southwark Plan 2007, Strategic Policy 2 Sustainable Transport of the Core Strategy 2011 and the National Planning Policy Framework 2012.

26. Western viaduct boundary

Before any above grade work thereby affected begins to the western viaduct (southern section), details of the means of the boundary treatment along the west-facing railway viaduct 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, and the approved means of enclosure shall be provided prior to the occupation of the development and retained as such thereafter.

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.

27. Telecommunications reception

Before any above grade work hereby authorised begins, details of how the impact of the development on television, radio and other telecommunications services will be assessed, the method and results of surveys carried out, and the measures to be taken to rectify any problems identified shall be submitted to and approved in writing by the Local Planning Authority. The premises shall not be occupied until any such mitigation measures as may have been approved have been implemented.

Reason

In order to ensure that any adverse impacts of the development on reception of residential properties is identified and resolved satisfactorily 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.

28. Public toilet

Prior to the commencement of above grade works, details of public toilet provision on the east site shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details thereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Reason:

To ensure that there would be adequate public toilet provision within the development, in accordance with saved policy 1.7 'Development within town and local centres' of the Southwark Plan (2007).

29. a) Prior to commencement of any above grade works to any residential building on the east site an acoustic assessment and detailed scheme of insulation measures (to include residential glazing, façade and ventilation specifications in addition to any treatments applied to the source) shall be submitted to the Local Planning Authority for approval. The scheme of measures shall be designed to ensure that sound from 4/5 Elephant Rd shall not exceed 27dB LAeq (5min) (11:00pm-07:00am) in bedrooms and 32dB LAeq (5min) (11:00pm-07:00am) for living rooms (with residential windows and doors closed) in any new residential dwelling.
- b) Once approved, the scheme of insulation shall be installed fully in accordance with the approved details.

- c) On completion and before the properties are occupied, validation testing to demonstrate compliance with the approved scheme of measures and above standards in (a) shall be undertaken using an agreed sample or about 10% of the affected properties. The report from the validation testing shall be approved in writing by the Local Planning Authority prior to first occupation.
- d) In the event of failure of any validation test, further testing may be required by the Local Planning Authority to determine the extent of failure. Following this a scheme of additional works and/or mitigation measures shall be submitted to the Local Planning Authority for approval, and installed fully in accordance with the approved scheme. Further post-completion validation testing and remedial works shall be conducted until full compliance with the standard is demonstrated to the satisfaction of the Local Planning Authority.
- e) The approved mitigation measures shall be permanently maintained thereafter.

Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011) saved policies 3.2 'Protection of amenity' and 4.2 'Quality of residential accommodation' of the Southwark Plan (2007), and the National Planning Policy Framework 2012.

- 30. Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme for the communal amenity areas (including cross sections, surfacing materials, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

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.

Pre-occupation conditions – the details required to be submitted for approval by the conditions 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

- 31. **Bird boxes**
Details of 4 mixed bird nesting boxes including open fronted boxes for black redstart, sparrow terraces and 1 peregrine tray together with details of no less than 6 swift nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority no later than 6 months prior to occupation. Details shall include the exact location, specification and design of the habitats.

They shall be installed within the development prior to the first occupation of the building of which they form part or the first use of the space in which they are contained in accordance with the approved details and shall be retained as such thereafter.

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.

- 32. **Play**
No later than 6 months prior to occupation details of the play equipment to be installed on the site shall be submitted to and approved in writing by the Local Planning Authority. The play equipment shall be provided in

accordance with the details thereby approved prior to the occupation of the residential units. All playspace and communal amenity space within the development shall be available to all residential occupiers of the development in perpetuity.

Reason

To ensure that there would be adequate play facilities to serve the development, in accordance with saved policy 4.2 'Quality of accommodation' of the Southwark Plan (2007) and strategic policy 13 'High environmental standards' of the Core Strategy (2011).

33. Protection from vibration

The development shall be designed to ensure that habitable rooms in the residential element of the development are not exposed to vibration dose values in excess of 0.13 m/s during the night-time period of 23.00 – 07.00hrs.

Prior to the occupation of the residential accommodation a post construction validation test shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that these standards have been met. Testing shall be fully in accordance with the methodology of BS EN ISO 140-4:1998 (for airborne sound) and BS EN ISO 140-7:1998 (for impact sound). Validation tests shall be carried out on a relevant sample of habitable rooms.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess vibration from transportation sources in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

34. Internal Ventilation in Areas of Poor Air Quality

The uses hereby permitted shall not be begun until a scheme for the internal ventilation of the development with appropriately located plant inlets, filters, outlets and treatments for that use has been submitted to and approved in writing by the Local Planning Authority. The details thereby approved shall be provided prior to the first use of the development.

Reason:

In order to ensure a good standard of air quality, and to ensure that that the ventilation ducting and ancillary equipment will not result in odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity, in accordance with Strategic Policy 13 – High Environmental Standards of the Core Strategy 2011 and saved policy 3.2 Protection of Amenity of the Southwark Plan 2007.

35. Security measures

The development shall be designed to achieve Secured by Design certification. Certificates to demonstrate this shall be submitted to and approved in writing by the Local Planning Authority prior to the last occupation of the development.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark plan 2007.

36. BREEAM

(a) Before any fit out works to the commercial premises hereby authorised begins, a BREEAM Design Stage Certificate and an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'excellent' rating for the class A1-A4 space and 'very good' for the class D2 space 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;

(b) Within 3 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.

37. Ventilation/Kitchen extract

Prior to the commencement of each cafe or restaurant use on the site (use class A3) full particulars and details of a scheme for the ventilation of the premises to an appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

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 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.

38. External lighting

Details of any external lighting to external areas surrounding the buildings 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.

39. Light pollution

Details to demonstrate whether there would be any light pollution to neighbouring residential properties as a result of the London College of Communications building, together with any mitigation measures if required, shall be submitted to and approved in writing by the Local Planning Authority. If mitigation is required, the approved details shall be implemented prior to the first use of the building and retained as such thereafter.

Reason:

To ensure that there would be no unacceptable light pollution to neighbouring residential properties, in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007) and strategic policy 12 'Design and conservation' of the Core Strategy (2011).

40. Flood evacuation plan

Before the development hereby permitted is occupied, a flood emergency and evacuation plan shall be submitted to and approved by the local planning authority (in consultation with the Council's Emergency Planning and Resilience Officer) including details of how occupants will be informed about and recommended to sign up to the Environment Agency Flood Warning Service. The flood emergency and evacuation plan shall be implemented on first occupation and carried out in accordance with the approved details.

Reason:

To ensure future occupiers are made aware of the flooding risk to this site within flood zone 3 in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and saved policy 3.9 Water of the Southwark Plan 2007.

41. Cycle storage (long stay)

Before the first occupation of the development, details of the long stay cycle storage facilities shall be provided to demonstrate that adequate provision is made in the locations identified on the plans approved herein and that the types of storage reflect the split presented in the approved Transport Assessment Addendum (WSP, June 2017). The long stay cycle parking shall thereafter be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users

and occupiers of the building in order to encourage the use of alternative means of transport 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.

42. Community Use Scheme (education building)

Within 6 months of occupation of the education building, 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 educational establishment;
- 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 within 9 months of occupation of the education building 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.

43. Community Use Scheme (leisure buildings)

Within 6 months of occupation of the leisure space, 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 educational establishment;
- 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 within 9 months of occupation of the education building and retained/maintained for the existence of the development.

Reason:

To secure community use of facilities in accordance with Saved Policy 2.2 'Provision of new community facilities 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.

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

44. Sounds insulation: Education

The educational use shall meet the standards as described in the Department for Education Building Bulletin 93 'BB93: Acoustic design of schools -performance standards'.

Reason:

To ensure a good standard of amenity for future occupiers in accordance with strategic policy 13 'High environmental Standards' of the Core Strategy (2011) and saved policies 3.2 'Protection of amenity', 3.11 'Efficient use of land' and 3.12 'Quality in design' of the Southwark Plan (2007).

45. Vertical sound transmission between commercial and residential properties

The habitable rooms within the development sharing a party ceiling/floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise from the commercial premises does not exceed NR25* when measured as an L₁₀ across any 5 minute period.

(*NR20 if the future use of the commercial unit is known to be a license premises or to contain loud processes or

equipment).

Party walls, floors and ceilings between the commercial premises and residential dwellings shall be designed to achieve the following minimum airborne sound insulation weighted standardised level difference:

- For A4 premises, D1\D2 premises such as places of worship, concert halls and community space for hire standards will be judged on a case by case basis depending on the exact nature of the use. Measures to achieve sound insulation greater than 60dB DnT,w + Ctr are likely to be necessary.
- For A3 or A5 premises or large A1 cafes, shops and supermarkets: At least 55dB DnT,w + Ctr
- For small cafés or shops: At least 50dB DnT,w + Ctr

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

46. Plant Noise

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. The specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014.

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).

47. External Noise Levels in Private Amenity Areas

Private gardens and communal external amenity areas shall be designed to attain 50dB(A) LAeq, 16hr †. Where this is not possible to achieve despite implementing all reasonable mitigation measures, the standard can be reduced by 5dB so that the sound level does not exceed 55dB LAeq, 16hr.

†Daytime - 16 hours between 07:00-23:00hrs.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

48. Sound transfer

Where dwellings (or parts of dwellings) within larger blocks are acoustically insulated against environmental noise, sound insulation standards are required to exceed the requirements of Building Regulations Approved Document E by 5dB, such that the airborne sound insulation weighted standardised level difference is increased by 5dB DnT,w + Ctr and the maximum allowable weighted standardised impact sound pressure level is reduced by 5dB LnT,w.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

49. Underground Servicing Area Extract Ventilation

The underground servicing areas shall be fitted with an extract ventilation system that will achieve the standards set out in BS 7346-7:2013 'Components for smoke and heat control systems, the Code of practice on functional recommendations and calculation methods for smoke and heat control systems for covered car parks' and Building Regulations Approved Document F.

Reason

In order to ensure that that the ventilation ducting and ancillary equipment will not result in odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity 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.

50. A3/A4 opening hours

Any class A3 (café / restaurant) and class A4 (drinking establishment) uses shall only be permitted to open between the hours of 0700 to 2300 Sunday to Thursday and 0700 to 0100 Fridays and Saturdays. The class D2 leisure use shall only be permitted to open between the hours of 0700 and 0100 daily.

Reason:

To safeguard the amenities of neighbouring residential properties 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.

51. Potable water

Each dwelling hereby permitted shall be constructed to achieve at least the optional standard 36(2b) of Approved Document G of the Building Regulations (2015).

Reason:

To ensure the development complies with the National Planning Policy Framework 2012, Strategic Policy 13 (High environmental standards) of the Core Strategy 2011, saved policies 3.3 Sustainability and Energy Efficiency of the Southwark Plan and Policy 5.15 of the London Plan 2015 (Water use and supplies).

52. Refuse storage

Before the first occupation of a particular plot hereby permitted, the refuse storage arrangements shown on the approved drawings for that plot shall be provided and made available for use by the occupiers of the development, 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

53. Wind microclimate

All wind microclimate mitigation measures detailed in section 7.2 (configuration 5) of the Environmental Statement shall be provided prior to the occupation of the development. These measures must be robust enough to limit the wind conditions to meet the activity criteria for that area/location as set out in the Lawson criteria, and wind speeds for cyclists must be 15m/s for no more than 1 hour per year (0.01% frequency) in the vicinity of the site.

Reason:

In the interests of amenity and safety, in accordance with saved policies 3.2 'Protection of amenity', 5.2 'Transport impacts' and 5.3 'Walking and cycling' of the Southwark Plan and strategic policies 2 'Sustainable Transport' and 13 'High environmental standards' of the Core Strategy (2011).

54. Retail floorspace requirement

A minimum of 50% of the retail space hereby approved shall be used for A1 purposes at any one time.

Reason:

To ensure that the proposal would provide a strong, retail focussed shopping centre for the area.

55. Accessible dwellings

90% of the residential units hereby permitted shall be constructed to standard M4(2) and 10% shall be constructed to standard M4(3) of Approved Document M of the Building Regulations (2015) – Access to and use of buildings.

Reason:

To ensure the development complies with Core Strategy 2011 Strategic Policy 5 (Providing new homes) and London Plan 2015 Policy 3.8 (Housing choice).

Other conditions – the following conditions are to be complied with and discharged in accordance with the individual requirements specified in the conditions

56. Archaeology Reporting Site Work

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.

57. East Site Basement Access

Prior to the commencement of any works thereby affected, detailed plans and appropriate supporting information relating to the design of the basement vehicular ramp, including the design and location of shutters/barriers and any other methods of access control that are located outside of the public highway, shall be submitted to the local planning authority for approval in writing. The development shall proceed in accordance with any approval given.

Reason:

In order to demonstrate that the physical design and management controls proposed are sufficient to ensure the efficient operation of the basement access, that they will prevent vehicles from impeding the New Kent Road footway and will minimise conflict between pedestrians, cyclists and vehicular traffic in accordance with saved policies 5.2 'Transport Impacts' and 5.2 'Walking and cycling' of the saved Southwark Plan 2007 and the National Planning Policy Framework 2012

West Site conditions

Pre-commencement condition(s) - unless otherwise stated, 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 the west site works granted by this permission is commenced.

58. 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.

i) The Phase 1 (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.

ii) Any 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 will 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 works 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 works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed shall be submitted to and approved in writing by the Local Planning Authority.

d) In the event that potential 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 off-site 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.

59. Tree Protection

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

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.

a) A detailed Arboricultural Method Statement showing 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, shall then be submitted to and approved in writing by the Local Planning Authority – this shall include for the retention of T13 (Beech). The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

b) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

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.

60. Archaeological Programme

Before any below ground work hereby authorised begins (excluding demolition), the applicant shall secure the implementation of a programme of archaeological work 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 archaeological operations are undertaken to an acceptable standard and that legitimate archaeological interest in the site is satisfied 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.

61. Archaeological Evaluation

Before any below ground work hereby authorised begins (excluding demolition), the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented 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.

62. Archaeological mitigation

Before any below ground work hereby authorised begins (excluding demolition), the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order to demonstrate that the range of archaeological mitigation is sufficient having considered the potential 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.

63. Archaeological Foundation and Basement Design

Before any below ground work hereby authorised begins (excluding demolition), a detailed scheme showing the complete scope and arrangement of the basement and foundation design and all ground works 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 order that details of the foundations, ground works and all below ground impacts of the proposed development are detailed and accord with the programme of archaeological mitigation works to ensure the preservation of archaeological remains by record and in situ 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.

64. Groundwater

No below ground works (excluding demolition) shall commence until suitable investigations are undertaken to determine the ground and groundwater conditions (including levels) at the site and an updated basement impact assessment is submitted to and approved in writing by the Local Planning Authority. This should include groundwater mitigation measures as required, with the measures constructed in accordance with the approved details.

Reason:

To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in accordance with section 5.3.3 of the Southwark Strategic Flood Risk Assessment (2008).

65. Surface Water

No below grade works shall commence until details of a surface water drainage strategy incorporating sustainable drainage principles to achieve a reduction in surface water run-off rates from the site to a minimum of 50% of that for the existing site during a 1% Annual Exceedance Probability (AEP) event, has been submitted to and approved in writing by Local Planning Authority. The site drainage must be constructed in accordance with the approved details.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with saved policy 3.9 Water of the Southwark Plan, Strategic policy 13 of the Core Strategy (2011) and guidance in the Sustainable Design and Construction SPD (2009).

66. Piling

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason:

The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

67. Impact studies on water infrastructure

Development shall not be commenced (excluding demolition) until impact studies of the existing water supply infrastructure have been submitted to and approved in writing by the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point.

Reason:

To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

Commencement of works above grade - the details required to be submitted for approval by the conditions 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, excluding demolition.

68. Notwithstanding the details presented on plan 935_02_07_100/Rev P3, prior to the commencement of works above grade detailed plans of the eastern public realm/footway and any proposed servicing bays on Oswin Street will be submitted to the Local Planning Authority for the approval in writing in order to demonstrate a satisfactory balance between accommodating the needs of the various road users with servicing demands and the delivery of a high quality public realm. The development shall proceed in accordance with any approval hereby given.

Reason:

In order to demonstrate that the transport impacts of the development are properly addressed as part of a coherent and high quality design solution in accordance with saved Southwark Plan policies 3.13 'Urban design' and 5.2 'Transport impacts' (2007), Core Strategy Strategic Policies 2 'Sustainable transport' and 12 'Design and conservation' (2011) and guidance in the Elephant and Castle SPD (2012) and National Planning Policy Framework (2012).

69. Detailed construction drawings

Prior to the commencement of works above grade (excluding cores) typical section detail-drawings at a scale of 1:5 or 1:10 through the following elements of the approved buildings referenced below:

- the facades;
- the shop fronts;
- heads, cills and jambs of openings;
- parapets;
- roof edges of

i) W1 residential tower;

ii) W2 residential towers (including safety measures to the balconies of tower W3 facing the Metropolitan Tabernacle and the 22nd floor level terrace and class D2 building (cultural venue); and

iii) W3 mansion blocks;

shall be submitted to the Local Planning Authority for approval in writing before any works thereby affected are carried out. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in the interest of the special architectural or historic qualities of the listed building in accordance with the NPPF (2012), Strategic policy SP12 – Design & Conservation - of the Core Strategy (2011) and saved policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

70. Materials samples: West Site

Sample panels of the external facing materials for the west site buildings including:

i) W1 residential tower;

ii) W2 residential towers and class D2 building (cultural venue); and

iii) W3 mansion blocks

to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority before above-grade works thereby affected are carried out; the development shall not be

carried out otherwise than in accordance with any such approval given. These samples must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF (2012), Policy SP12, Design & Conservation of the Core Strategy 2011 and saved policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

71. Mock-Up: West Site

Full-scale mock-ups of the façades of the west site residential towers W1, W2 and W3 to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority before any above ground works thereby affected are carried out; the development shall not be carried out otherwise than in accordance with any such approval given. These samples must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF (2012), Strategic policy SP12 – Design & Conservation - of the Core Strategy (2011) and saved policies: 3.12 Quality in Design; 3.13 Urban Design; and 3.20 Tall buildings of The Southwark Plan (2007).

72. Green Roof

Before any above grade work hereby authorised begins, the feasibility of providing a green or brown roof shall be submitted to and approved in writing by the Local Planning Authority. If it is deemed to be feasible, full details of the green or brown roof shall be provided which shall be:

- biodiversity based with extensive substrate base (depth 80-150mm);
- laid out in accordance with agreed plans; and
- planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 2.18, 5.3, 5.10, and 511 of the London Plan 2016, saved policy 3.28 of the Southwark Plan 2007 and Strategic Policy 11 of the Southwark Core Strategy 2011.

73. Green Wall

Before any above grade work hereby authorised begins, details of the green wall shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

The wall shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. The green wall shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 2.18, 5.3, 5.10, and 511 of the London Plan 2016, saved policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core Strategy 2011

74. Means of enclosure

Before any above grade work hereby authorised begins, details of the means of enclosure for the ground floor units in plot W3 (the Mansion Block) facing Oswin Street 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 and the means of enclosure provided prior to the occupation of the plot.

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.

75. Telecommunications reception

Before any above grade work hereby authorised begins, details of how the impact of the development on television, radio and other telecommunications services will be assessed, the method and results of surveys carried out, and the measures to be taken to rectify any problems identified shall be submitted to and approved in writing by the Local Planning Authority. The premises shall not be occupied until any such mitigation measures as may have been approved have been implemented.

Reason:

In order to ensure that any adverse impacts of the development on reception of residential properties is identified and resolved satisfactorily 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.

76. Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme for the communal amenity areas (including cross sections, surfacing materials, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

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.

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

77. Bird boxes

Details of 4 mixed bird nesting boxes including open fronted boxes for black redstart, sparrow terraces and 1 peregrine tray together with details of no less than 6 swift nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority no later than 6 months prior to occupation. Details shall include the exact location, specification and design of the habitats.

They shall be installed within the development prior to the first occupation of the building of which they form part or the first use of the space in which they are contained in accordance with the approved details and shall be retained as such thereafter.

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 2016, Policy 3.28 of the Southwark Plan 2007 and Strategic Policy 11 of the Southwark Core Strategy 2011.

78. Play

No later than 6 months prior to occupation details of the play equipment to be installed on the site shall be submitted to and approved in writing by the Local Planning Authority. The play equipment shall be provided in accordance with the details thereby approved prior to the occupation of the residential units. All playspace and communal amenity space within the development shall be available to all residential occupiers of the development in perpetuity.

Reason:

To ensure that there would be adequate play facilities to serve the development, in accordance with saved policy 4.2 'Quality of accommodation' of the Southwark Plan (2007) and strategic policy 13 'High environmental standards' of the Core Strategy (2011).

79. Wind microclimate

a) All wind microclimate mitigation measures detailed in section 7.2 (configuration 5) of the Environmental Statement shall be provided prior to the occupation of the development. These measures must be robust enough to limit the wind conditions to meet the activity criteria for that area/location as set out in the Lawson criteria, and wind speeds for cyclists must be 15m/s for no more than 1 hour per year (0.01% frequency) in the vicinity of the site.

b) Two additional receptors shall be tested for wind microclimate, one at the side entrance to the Metropolitan Tabernacle church and the other underneath the archway which leads to the passageway along the northern side of the Metropolitan Tabernacle. Any mitigation required must be robust enough to limit the wind conditions to meet the activity criteria for that area/location as set out in the Lawson criteria. Details to demonstrate this shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of above grade works and implemented prior to the occupation of the development.

Reason

In the interests of amenity and safety, in accordance with saved policies 3.2 'Protection of amenity', 5.2 'Transport impacts' and 5.3 'Walking and cycling' of the Southwark Plan and strategic policies 2 'Sustainable Transport' and 13 'High environmental standards' of the Core Strategy (2011).

80. Protection from vibration

The development shall be designed to ensure that habitable rooms in the residential element of the development are not exposed to vibration dose values in excess of 0.13 m/s during the night-time period of 23.00 – 07.00hrs.

Prior to the occupation of the residential accommodation a post construction validation test shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that these standards have been met. Testing shall be fully in accordance with the methodology of BS EN ISO 140-4:1998 (for airborne sound) and BS EN ISO 140-7:1998 (for impact sound). Validation tests shall be carried out on a relevant sample of habitable rooms.

Reason

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess vibration from transportation sources in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

81. Internal Ventilation in Areas of Poor Air Quality

The uses hereby permitted shall not be begun until a scheme for the internal ventilation of the development with appropriately located plant inlets, filters, outlets and treatments has been submitted to and approved in writing by the Local Planning Authority. The details thereby approved shall be provided prior to the first use of the development.

Reason

In order to ensure a good standard of air quality, and to ensure that that the ventilation ducting and ancillary equipment will not result in odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity, in accordance with Strategic Policy 13 – High Environmental Standards of the Core Strategy 2011 and saved policy 3.2 Protection of Amenity of the Southwark Plan 2007.

82. Security measures

The development shall be designed to achieve Secured by Design certification. Certificates to demonstrate this shall be submitted to and approved in writing by the Local Planning Authority prior to the last occupation of the development.

Reason

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark plan 2007.

83. BREEAM

(a) Before any fit out works to the commercial premises hereby authorised begins, a BREEAM Design Stage Certificate and an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'excellent' rating for the class A1-A4 space and office space and 'very good' for the class D2 space (cultural venue) 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;

(b) Within 3 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.

84. Obscure glazing

Details of obscure glazing or other device to maintain privacy between opposite facing windows on the southern elevation of tower W1 and the northern elevation of plot W3 (the Mansion Block) shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to the occupation of the affected residential units and retained as such thereafter.

Reason:

In order to protect the privacy and amenity of future occupiers of the development, in accordance with saved policy 4.2 'Quality of design' of the Southwark Plan (2007).

85. Ventilation/Kitchen extract

Prior to the commencement of each cafe or restaurant use on the site (use class A3) full particulars and details of a scheme for the ventilation of the premises to an appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

Reason:

In order to ensure that 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 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.

86. External lighting

Details of any external lighting to external areas surrounding the buildings 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.

87. Flood evacuation plan

Before the development hereby permitted is occupied, a flood emergency and evacuation plan shall be submitted to and approved by the local planning authority (in consultation with the Council's Emergency Planning and Resilience Officer) including details of how occupants will be informed about and recommended to sign up to the Environment Agency Flood Warning Service. The flood emergency and evacuation plan shall be implemented on first occupation and carried out in accordance with the approved details.

Reason:

To ensure future occupiers are made aware of the flooding risk to this site within flood zone 3 in accordance with

The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and saved policy 3.9 Water of the Southwark Plan 2007.

88. Cycle storage (long stay)

Before the first occupation of the development, details of the long stay cycle storage facilities shall be provided to demonstrate that adequate provision is made in the locations identified on the plans approved herein and that the types of storage reflect the split presented in the approved Transport Assessment Addendum (WSP, June 2017). The long stay cycle parking shall thereafter be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport 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.

89. Cultural venue noise outbreak

The class D2 building (cultural venue) hereby approved shall be designed to meet the recommended levels set out in British Standard BS8233:2014. The LA10 sound from amplified and non-amplified music and amplified speech shall not exceed the lowest L90 (5min), 1m from the facade of any sensitive receptor in all octave bands between 63Hz and 8 kHz.

Prior to the first use of this facility details to demonstrate compliance with these requirements and to demonstrate that the use would not adversely impact upon nearby sensitive receptors shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011) saved policies 3.2 'Protection of amenity' and 4.2 'Quality of residential accommodation' of the Southwark Plan (2007), and the National Planning Policy Framework 2012.

90. Community Use Scheme (leisure buildings)

Within 6 months of occupation of the leisure space, 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 educational establishment;
- 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 within 9 months of occupation of the education building and retained/maintained for the existence of the development.

Reason:

To secure community use of facilities in accordance with Saved Policy 2.2 'Provision of new community facilities 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.

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

91. Accessible dwellings

90% of the residential units hereby permitted shall be constructed to standard M4(2) and 10% shall be constructed to standard M4(3) of Approved Document M of the Building Regulations (2015) – Access to and use of buildings.

Reason:

To ensure the development complies with Core Strategy 2011 Strategic Policy 5 (Providing new

homes) and London Plan 2015 Policy 3.8 (Housing choice).

92. Residential units – internal noise levels

The dwellings hereby permitted shall be designed to ensure that the following internal noise levels specified by BS 8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings are not exceeded due to environmental noise:

Bedrooms - 35dB LAeq T†, 30 dB LAeq T*, 45dB LAFmax T *

Living rooms- 35dB LAeq T †

Dining room - 40 dB LAeq T †

* - Night-time 8 hours between 23:00-07:00

† - Daytime 16 hours between 07:00-23:00.

Reason:

To ensure a good standard of accommodation for future occupiers, in accordance with saved policy 4.2 'Quality of accommodation' of the Southwark Plan (2007).

93. Vertical sound transmission between commercial and residential properties

The habitable rooms within the development sharing a party ceiling/floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise from the commercial premises does not exceed NR25* when measured as an L₁₀ across any 5 minute period.

(*NR20 if the future use of the commercial unit is known to be a license premises or to contain loud processes or equipment).

Party walls, floors and ceilings between the commercial premises and residential dwellings shall be designed to achieve the following minimum airborne sound insulation weighted standardised level difference:

- a) For A4 premises, D1\D2 premises such as places of worship, concert halls and community space for hire standards will be judged on a case by case basis depending on the exact nature of the use, and measures to achieve sound insulation greater than 60dB DnT,w + Ctr are likely to be necessary.
- b) For A3 or A5 premises or large A1 cafes, shops and supermarkets: At least 55dB DnT,w + Ctr
- c) For small cafés or shops: At least 50dB DnT,w + Ctr

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

94. Plant Noise

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. The Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014.

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).

95. External Noise Levels in Private Amenity Areas

Private gardens and communal external amenity areas shall be designed to attain 50dB(A) LAeq, 16hr † .

Where this is not possible to achieve despite implementing all reasonable mitigation measures, the standard can be reduced by 5dB so that the sound level does not exceed 55dB LAeq, 16hr.

†Daytime - 16 hours between 07:00-23:00hrs.

Reason

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

96. Sound transfer

Where dwellings (or parts of dwellings) within larger blocks are acoustically insulated against environmental noise, sound insulation standards are required to exceed the requirements of Building Regulations Approved Document E by 5dB such that airborne sound insulation weighted standardised level difference is increased by 5dB $D_{nT,w} + C_{tr}$ and the maximum allowable weighted standardised impact sound pressure level is reduced by 5dB $L_{nT,w}$.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2012.

97. Underground Car-park Extract Ventilation

The underground car park / servicing areas shall be fitted with an extract ventilation system that will achieve the standards set out in BS 7346-7:2013 'Components for smoke and heat control systems. Code of practice on functional recommendations and calculation methods for smoke and heat control systems for covered car parks' and Building Regulations Approved Document F.

Reason:

In order to ensure that that the ventilation ducting and ancillary equipment will not result in odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity 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.

98. A3/A4 Opening hours

Any class A3 (café / restaurant) and class A4 (drinking establishment) uses shall only be permitted to open between the hours of 0700 to 2300 Sunday to Thursday and 0700 to 0100 Fridays and Saturdays. The class D2 leisure use shall only be permitted to open between the hours of 0700 and 0100 daily.

Reason:

To safeguard the amenities of neighbouring residential properties 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.

99. Potable water

Each dwelling hereby permitted shall be constructed to achieve at least the optional standard 36(2b) of Approved Document G of the Building Regulations (2015).

Reason

To ensure the development complies with the National Planning Policy Framework 2012, Strategic Policy 13 (High environmental standards) of the Core Strategy 2011, saved policies 3.3 Sustainability and Energy Efficiency of the Southwark Plan and Policy 5.15 of the London Plan 2015 (Water use and supplies).

100. Refuse storage

Before the first occupation of the development hereby permitted, the refuse storage arrangements shown on the approved drawings shall be provided and made available for use by the occupiers of the development 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 2011 and Saved Policies 3.2 Protection of Amenity and Policy 3.7 Waste Reduction of The Southwark Plan 2007

101. Electric Vehicle Charging Points

The basement wheelchair accessible car parking shown on the drawings hereby approved shall be provided prior to the occupation of the development and shall be retained as such thereafter for the purposes of car parking for

vehicles. 20 per cent of all of the car parking spaces hereby approved shall be fitted with charging points for electric vehicles, and an additional 20 per cent shall incorporate passive provision for the charging of electric vehicles in the future.

Reason

To ensure that there would be adequate wheelchair accessible parking to serve the development and that an appropriate proportion is equipped as electric vehicle charging points, in accordance with saved policy 5.7 'Wheelchair accessible parking' of the Southwark Plan (2007) and to encourage more sustainable travel in accordance with The National Planning Policy Framework 2012, policy 6.13 'Parking' of the London Plan (2016), Strategic Policy 2 Sustainable Transport of The Core Strategy 2011 and Saved Policies 3.1 Environmental Effects and 5.2 Transport Impacts of the Southwark Plan 2007.

Other conditions

102. Archaeology Reporting Site Work

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.

103. Prior to the commencement of any works thereby affected, detailed plans and appropriate supporting information relating to the design of the basement vehicular ramp, including details of a traffic management system to establish priority for incoming vehicles and of the position of any traffic lights and/or signage that are located outside of the public highway shall be submitted to the local planning authority for approval in writing. The development shall proceed in accordance with any approval given.

Reason

In order to demonstrate that access to the site is safe, efficient and convenient for vehicles, cyclists and pedestrians and minimises insofar as possible the potential for queueing vehicles on Oswin Street in accordance with saved policies 5.2 'Transport impacts' and 5.3 'walking and cycling' of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

Statement of positive and proactive action in dealing with the application

A number of amendments have been made to the application in order to enable a positive recommendation to be made.

Informative

Conditions - It is recommended that the Director of Planning (in consultation with the Chair of Planning Committee) be authorised under delegated authority to make any minor modifications to the proposed conditions arising out of detailed negotiations with the applicant and/or other stakeholders such as the GLA and TfL, which may necessitate further modification and may include the variation, addition, or deletion of the conditions as drafted.

Community Infrastructure Levy (CIL) - Phased planning permission. Regulation 9(4) of the Community Infrastructure Levy Regulations 2010 (as amended) states that in the case of a grant of phased planning permission, each phase of the development is a separate chargeable development. 'Phased planning permission' has the meaning defined in the interpretation section of the Regulations at 2(1). It states that a phased planning permission means a planning permission which expressly provides for development to be carried out in phases.

Phases for the purposes of calculating and collecting CIL

Due to the structure of planning conditions attached to this planning permission, the CIL phases are to be defined by a CIL Phasing Plan submitted to the Local Planning Authority.

Demolition comprises a CIL phase in its own right.

Accordingly, each of the CIL phases are separate chargeable developments and, in turn, will attract their own CIL liabilities.

Ventilation details - The developer is asked to pay particular attention to the extract ventilation at the design stage. Low level discharge is discouraged even if UV and filters are incorporated. Any exhaust flue from the commercial kitchen should terminate at 1m above the building eaves.

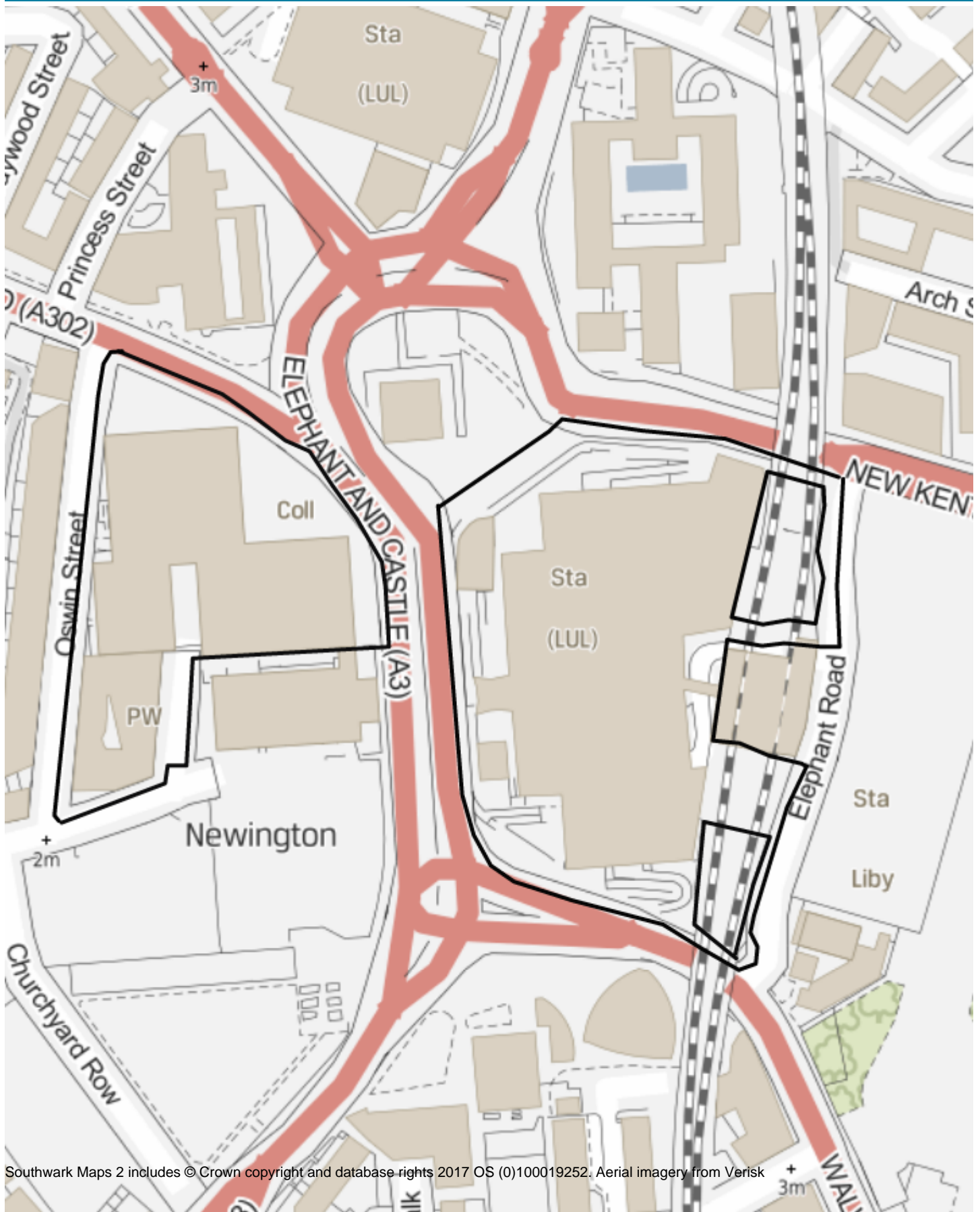
Thames Water - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

Environment Agency – Strongly advise that flood resistant and resilience measures for the basement and ground floor levels up to the flood level of 3.61m AOD are designed in at both sites. Information on flood resilience can be found on the following link http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf.

UXO - The development of the site should include adequate provision for the surveying the site for potential Unexploded Ordnance. If that survey work identifies any anomalies that may be UXO, the site operators must contact both the police and the local Authority at an early opportunity to agree timescales and further actions.

Condition 56 - Underground Car-park Extract Ventilation. The documents in this condition specify that the ventilation requirement will be satisfied if the openings at each car parking level have an aggregate area equal to at least 1/20th of the floor area at that level, of which at least half should be in two opposing walls, this may be difficult to achieve particularly if the car park is below ground level. Approved Document F also allows an alternative approach, in which the requirement will be satisfied if the mean predicted pollutant levels are calculated and the ventilation designed to limit the concentration of carbon monoxide to not more than 50 parts per million average over an eight hour period and peak concentrations, such as by ramps and exits, not to go above 100 parts per million for periods not exceeding 15 minutes.

Agenda Item 6.2



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50 m

7-Dec-2017

Scale = 1 : 2000

Item No. 6.2	Classification: Open	Date: 03 July 2018	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 16/AP/4525 for: Listed Building Consent Address: METROPOLITAN TABERNACLE CHURCH, ELEPHANT AND CASTLE, LONDON, SE1 6SD Proposal: Minor amendments to the northern elevation of the grade II listed Metropolitan Tabernacle building by virtue of the demolition of the immediately adjacent/abutting London College of Communications building (subject to planning application reference: 16-AP-4458).		
Ward(s) or groups affected:	St George's		
From:	Director of Planning		
Application Start Date 07/11/2016		Application Expiry Date 02/01/2017	
Earliest Decision Date 03/02/2017			

RECOMMENDATION

1. That listed building consent be granted, subject to a s106 legal agreement

BACKGROUND

2. This application is before members owing to its links to planning application 16-AP-44548 for redevelopment of the Elephant and Castle Shopping Centre and London College of Communications sites (the main planning application) which appears as item 6.1 on the committee agenda.
3. This application was on the agenda for the 16 and 30 January 2018 planning committee meetings, but a decision was deferred because the main planning application was deferred to enable officers to consider and consult upon a revised proposal submitted by the applicant.

Site location and description

4.

Type of property	The Metropolitan Tabernacle which is a large church located on the western side of Elephant and Castle.
Site bound by	
Is property listed?	YES - Grade II - facade only.
In conservation area?	NO

The proposal is for:

5. Minor amendments to the northern elevation of the grade II listed Metropolitan Tabernacle building by virtue of the demolition of the immediately adjacent/abutting London College of Communications building (subject to planning application reference:

16-AP-4458).

Planning history

6.	15/AP/2242 Application type: Advertisement Consent (ADV) Display of internally illuminated and static double sided advert panel at departure end of bus shelter Decision date 03/08/2015 Decision: Granted (GRA)
	15/AP/3705 Application type: Advertisement Consent (ADV) Display of x1 digital 84" screen advertisement to bus shelter, with illuminated, static and dynamic content capabilities; and with x1 static poster advertisement on the reverse side. Decision date 24/11/2015 Decision: Granted (GRA)
	15/AP/3704 Application type: Advertisement Consent (ADV) Display of a double-sided freestanding forum structure, featuring 1 x digital 84" screen on one side and a static poster advertisement panel on the reverse. Decision date 24/11/2015 Decision: Granted (GRA)
	16/AP/0094 Application type: Listed Building Consent (LBC) Installation of a pedestrian guard rail to the two lower landings on either side of the east entrance of the The Metropolitan Tabernacle; Installation of a ramp and associated guard rail, involving minor excavation works. Decision date 24/02/2016 Decision: Granted (GRA)
	16/AP/1147 Application type: Advertisement Consent (ADV) Installation of double-sided freestanding Forum Structure, featuring 2 x Digital 84" screens positioned back to back Decision date 10/06/2016 Decision: Granted (GRA)
	16/AP/1131 Application type: Advertisement Consent (ADV) Installation of double-sided freestanding Forum Structure, featuring 2 x Digital 84" screen positioned back to back Decision date 10/06/2016 Decision: Granted (GRA)

Policy

7. Listed Building Consent is considered under the terms of the Planning (Listed Building and Conservation Areas) Act (1990) [the Act]. There is material guidance as to the application of the relevant legal duties in the NPPF (2012) and associated guidance. The council's policies also protect listed buildings in a manner which is consistent with the applicable duties.
8. The Act requires that special regard should be had to the importance of preserving and enhancing the 'special interest' of listed buildings and their settings. The NPPF reinforces these principles stressing that heritage assets are irreplaceable and once lost can never be recovered. It requires Local Planning Authorities to avoid harm to heritage assets and to ensure that development conserves and enhances heritage assets and their settings.

National Planning Policy Framework (NPPF)

9. Chapter 12: Conserving and Enhancing the Historic Environment.

The London Plan 2016

10. Policy 7.8: Heritage Assets and Archaeology.

Core Strategy 2011

11. Strategic Policy 12: Design and Conservation

Southwark Plan 2007 (July) - saved policies

12. 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.

3.15 Conservation of the Historic Environment; and

3.17 Listed Buildings.

3.18 Setting of listed buildings, conservation areas and world heritage sites

Summary of consultation responses

- 13.

Total number of representations:	0				
In favour:	0	Against:	0	Neutral:	0
Petitions in favour:	0		Petitions against:	0	

Issues raised by neighbours and statutory consultees

14. None

Understanding the significance and the proposal

15. Paragraph 129 of the NPPF requires Local Planning Authorities to identify the architectural or historic significance of a designated heritage asset and to record the effect of any proposal on that architectural or historic significance.
16. The architectural or historic significance of any heritage asset includes its internal and external historic features and its setting. In addition to the facades of a Listed Building its features of significance could include its roof, its plan form, decorative internal features like original cornices, skirtings and fireplaces and important structures like floor beams, staircases or chimneys.

17. In addition to the features described or noted in the Listing **No**
Description, are there features of architectural or historic
significance that this property currently retains?
- Details:** The Listing Description is clear that the only part of the Tabernacle that is statutory listed is the stone-finished neo-Classical facade facing Newington Butts including the central pediment and its north and south flanks. The extent of the historic fabric is apparent especially when viewed on the southern edge where the stone facade and cornice returns for a short distance before the facing material changes to a render face.

Assessment of harm to significance

18. The NPPF requires Local Planning Authorities to consider whether a proposal would result in harm to the significance of a heritage asset and to decide whether that harm would be 'substantial' or 'less than substantial'.
19. Paragraphs 133 and 134 of the NPPF also require Local Planning Authorities to weigh any that harm against the public benefits of the development proposed, including

securing the optimal viable use of the heritage asset.

20. Harm can arise from the loss of historic fabric or features of significance as well as impact on the setting of a heritage asset. Whether 'substantial' or 'less than substantial', any harm should be avoided unless it can be justified by what is proposed by the application.

21.	Does the proposal cause harm to the architectural or historic significance of the heritage asset or its setting?	No
	Details: The proposed repairs to the Listed Building are entirely appropriate, complementary and will greatly enhance the listed fabric.	
	Is there sufficient information to show the public benefits of the proposal or improved usability of the heritage asset?	Yes
	Details: The proposal anticipates the demolition of the existing London College of Communications on the northern edge of the Tabernacle. As a consequence of this the northern flank of the historic Tabernacle facade will be exposed. The current London College of Communications building has a very harsh relationship with the listed building and abuts it abruptly. In this location the stone return and cornice, (which currently extends around the corner on the southern edge) was simply truncated by the College building at this northern edge.	
	The proposal seeks to carry out repairs to the exposed northern flank of the listed building and could include the reinstatement of the stone return and cornice on the northern edge of the listed facade. This is welcomed and would greatly enhance the appearance of the statutory listed building. The repairs will be scheduled when the flank is exposed (at the demolition of the existing London College of Communications) and should match exactly the materials, workmanship and detailing of the preserved southern facade.	
	It has not been possible to assess the condition of this wall during the application as it is currently behind an existing building and is on an adjacent site.	
	Taking this into account officers recommend that after the demolition of the adjacent LCC Building and prior to occupation of the W2 towers, that a scheme of repairs for the northern facade of the Tabernacle should be reserved as a s106 obligation of the associated planning application, requiring a minimum of 1:20 scale details of the proposed repairs / reinstatement of the stone return and cornice (to match the southern end). Details would need to be agreed in writing by the Local Planning Authority.	
	Do you consider that harm to be 'less than substantial'?	No Harm
	Details: No harm is envisaged	

Conclusion on planning and other issues

22. The NPPF requires Local Planning Authorities to balance the harm against the benefits of the proposed development and to conclude whether the proposed harm is outweighed by the public benefits of the development. The greater the harm the greater the justification necessary.

23.	Is any harm to the heritage asset outweighed by public benefits arising from the proposal including securing an optimal viable use?	There is no harm. The works are in the public interest
	Details: The proposed repairs to the Listed Building are entirely appropriate, complementary and will greatly enhance the listed fabric.	

Conclusion

24. The proposal demonstrates that it conforms with the council's legal duties as identified above. It complies with development plan policy and national guidance in that it will not cause harm to the listed building and will preserve and enhance the listed building and its setting as identified above. Listed Building Consent should accordingly be granted. In recognition that this proposal is linked to a strategic redevelopment proposal with a long build period (application reference 16-AP-4458), it is recommended that standard three years for implementation condition be increased to ten years in this instance.

Human rights implications

25. 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.
26. This application has the legitimate aim of providing a comprehensive mixed-use development on the site. 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/1541-14	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquires telephone: 020 7525 5403
Application file: 16/AP/4525		Planning enquires email: planning.enquiries@southwark.gov.uk
Southwark Local Development Framework and Development Plan Documents		Case officer telephone: 020 7525 5410
		Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning		
Report Author	Victoria Lewis, Team Leader / Michael Tsoukaris, Group Manger Design & Conservation		
Version	Final		
Dated	20 June 2018		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments included	
Strategic Director of Finance and Governance	No	No	
Strategic Director of Environment and Social Regeneration	No	No	
Strategic Director of Housing and Modernisation	No	No	
Director of Regeneration	No	No	
Date final report sent to Constitutional Team		21 June 2018	

APPENDIX 1**Consultation undertaken**

Site notice date: 20/12/2016

Press notice date: 15/12/2016

Case officer site visit date: Various

Neighbour consultation letters sent: 11/01/2017

Internal services consulted:

n/a

Statutory and non-statutory organisations consulted:

The Victorian Society

Neighbour and local groups consulted:

By Email

Elephant & Castle London SE1 6SD

Re-consultation: n/a

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

None

Statutory and non-statutory organisations

None

Neighbours and local groups

Elephant & Castle London SE1 6SD

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	Elephant & Castle Properties Co Ltd	Reg. Number	16/AP/4525
Application Type	Listed Building Consent	Case	TP/1541-14
Recommendation	Grant subject to Legal Agreement	Number	

Draft of Decision Notice

Listed Building CONSENT was given to carry out the following works:

Minor amendments to the northern elevation of the grade II listed Metropolitan Tabernacle building by virtue of the demolition of the immediately adjacent/abutting London College of Communications building (subject to planning application reference: 16-AP-4458).

At: METROPOLITAN TABERNACLE CHURCH, ELEPHANT AND CASTLE, LONDON SE1 6SD

In accordance with application received on 07/11/2016

and Applicant's Drawing Nos. Drawing numbers 935_02_07_210 Rev P2, 935_02_07210 Rev P3, Design and Access Statement, Townscape Built Heritage and Visual Assessment.

Subject to the following two conditions:

Time limit for implementing this permission and the approved plans

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

Reason:

In recognition that this listed building consent is linked to a strategic, phased redevelopment with a long build period.

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.

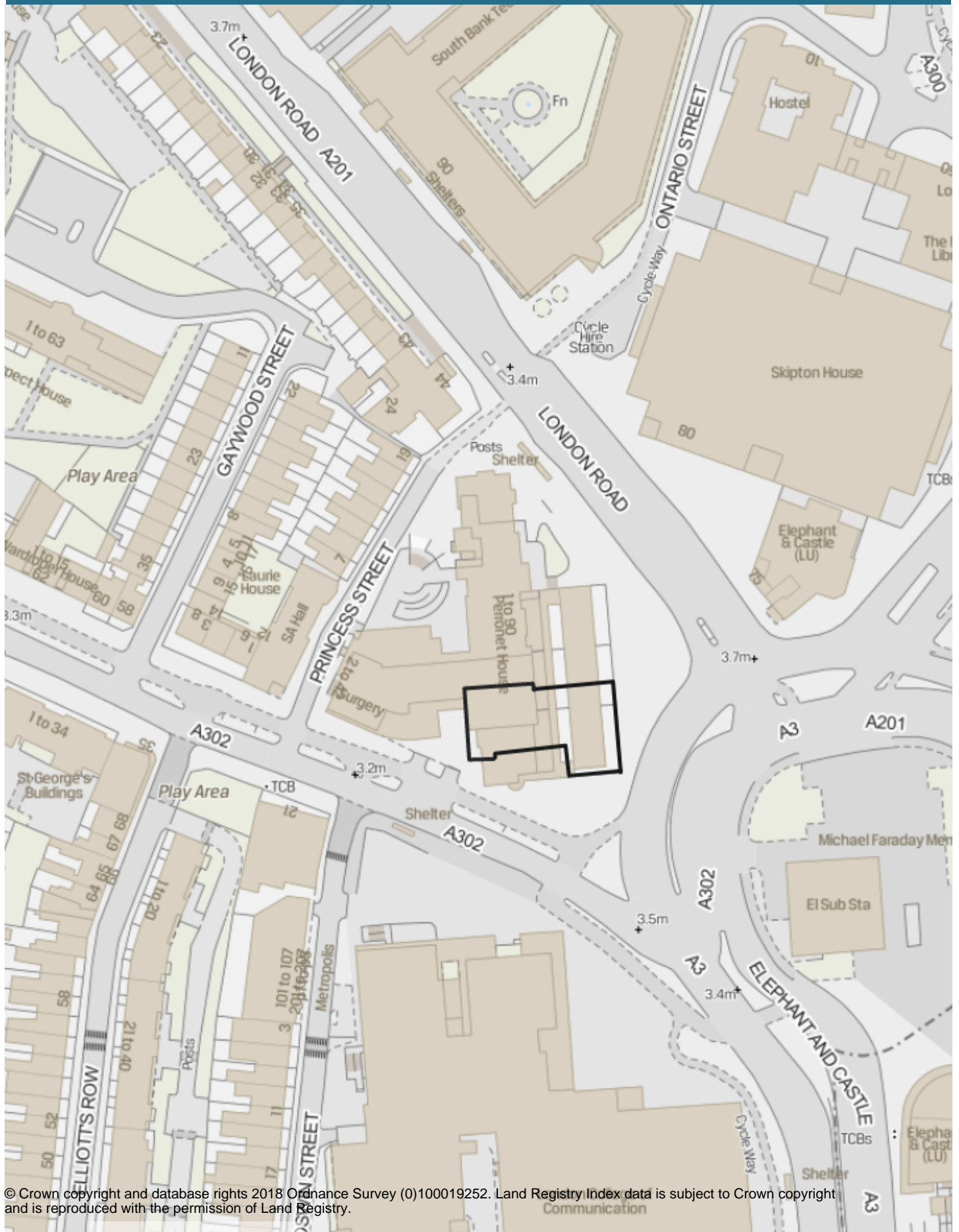
- 2 All new internal/external works and finishes and works of making good shall match existing original work adjacent in respect of materials used, detailed execution and finished appearance, except where indicated otherwise on the drawings hereby approved or as required by any condition(s) attached to this consent.

Reason:

In order to ensure that the design and details are in the interest of the special architectural or historic qualities of the listed building in accordance with The National Planning Policy Framework 2012, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies: 3.15 Conservation of the Historic Environment; 3.16 Conservation Areas; 3.17 Listed Buildings; of The Southwark Plan 2007.

Agenda Item 6.3

GROUND FLOOR, PERRONET HOUSE GAYWOOD ESTATE, PRINCESS STREET, LONDON, SE1 6JR



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50 m

Scale = 1250

22-Jun-2018

Item No. 6.3	Classification: Open	Date: 3 July 2018	Meeting Name: Planning Committee
Report title:	Development Management planning application: Council's own development Application 17/AP/4651 for: Full Planning Application Address: GROUND FLOOR, PERRONET HOUSE GAYWOOD ESTATE, PRINCESS STREET, LONDON SE1 6JR Proposal: Change of use of 12 existing garages / parking spaces to provide retail space (use class A1), café space (use class A3) and ancillary storage / plant and servicing space, together with new glazing and doors to south, east and west elevations.		
Ward(s) or groups affected:	St.George's		
From:	Victoria Lewis		
Application Start Date 13/12/2017		Application Expiry Date 07/02/2018	
Earliest Decision Date 05/01/2018		Time Extension Date 06/07/2018	

RECOMMENDATION

1. That planning permission be granted, subject to conditions.

BACKGROUND INFORMATION

Site location and description

2. The application relates to a parking area on the ground floor of Perronet House, an 11-storey block of flats located in the heart of Elephant and Castle Town Centre, to the north of the London College of Communications. The ground floor of the building contains two parking areas, northern and southern, together with the Princess Street Medical Practice which is accessed from Princess Street and occupies part of the ground and first floor of the building, and St George's Pharmacy.
3. This application relates specifically to the southern parking area which is accessed from St George's Road via a small servicing area which also serves the pharmacy and the medical practice. There are two vehicle accesses into the servicing area located alongside each other, one leading to the garages and the other leading to 5 parking spaces which serve the medical practice. The southern parking area is enclosed by brick walls and metal roller shutters and used to contain 16 garages, but the application advises that they have been closed since 2012 on account of safety reasons. Four of the parking spaces were lost in around 2014 / 2015 when part of the space was converted to form the pharmacy, and 12 unused spaces remain.
4. The site does not sit within a conservation area and the building is not listed. The Michael Faraday Memorial is a grade II listed structure approximately 50m to the south-east of the site, and the Elliot's Row Conservation Area is to the south and west of the site.

Details of proposal

5. This application has been submitted by the council, and seeks full planning permission to convert the 12 existing garages in the southern parking area into 314sqm of retail space (use class A1) and 170sqm of cafe space (use class A3), with 66sqm of ancillary storage and WCs (550sqm in total). The proposal has been named 'Elephant Arcade'.
6. The main entrance to the building would be from the eastern elevation, leading to 11 retail units ranging from 10-29sqm in size which would face each other across a 3.8m wide arcade. At the end of the arcade there would be storage areas and WCs. The cafe space would occupy the south-western corner of the building and could be accessed from the retail arcade or from new doors in the southern elevation of the building. The applicant has advised that it could accommodate up to 100 people, including 24 seats outside the south-eastern corner of the building. External alterations proposed comprise the installation of metal framed, double-glazed shopfronts and doors, together with new planters in front of the shopfront windows. Matching brick would be used to infill / make good where required.
7. This application is before Members for determination following a "call-in" request from Councillors, and due to its links to planning application 16/AP/4458 for redevelopment of the Elephant and Castle Shopping Centre and London College of Communications sites, which is also to be considered by members at this committee. The Perronet House proposal has been developed by the council in order to provide affordable retail space for independent traders affected by the proposed redevelopment of the shopping centre, and with the potential exception of the café, would be offered to them in the first instance. It is intended that the space at Perronet House would be completed before the closure of the shopping centre, so that traders could move straight in.

Planning history

8. 14/AP/3976 - Conversion of part of the ground floor car park of an existing housing block into pharmacy. Existing shutters in the external wall are to be converted into shop windows / door. Planning permission was GRANTED in December 2014 and has been implemented. The consented hours of use for the pharmacy are 0800-1830 Monday to Friday, 0900-1700 on Saturdays; the pharmacy is not permitted to open on Sundays and is only permitted to open for four hours on Bank Holidays to provide emergency pharmaceutical. The hours were restricted in order to protect residential amenity.
9. 12/AP/3875 - Conversion of part of the ground floor car park of an existing housing block to a pharmacy (use class A1) with the provision of glazed shopfronts. Planning permission was GRANTED in July 2013. This was for a similar proposal to the above, but would have occupied a larger area.
10. 07/AP/2275 - Conversion of existing storage space on ground floor into a shop (Use Class A1), together with the installation of a new shopfront. This application related to the northern parking area, and storage space facing London Road. The application was presented to Borough and Bankside Community Council in May 2008 with a recommendation for approval. Members resolved to refuse permission on the basis of lack of a noise attenuation report, and because an emergency access from the shop would have given access to the northern parking area, making this area unsecured. The decision was not issued however, and the application was treated as withdrawn in August 2011 which means that no formal decision was made.

11. 03/AP/0021 - Change of use of ground and first floor to a doctors' surgery, as extension to existing surgery together with the provision of two parking spaces at the front. Planning permission was GRANTED in February 2003.

Planning history of adjoining sites

12. Although not an adjoining site, the planning application for Perronet House is linked to the following application for the shopping centre site:

Shopping centre site Elephant and Castle, 26, 28, 30 and 32 New Kent Road, Arches 6 and 7 Elephant Road and London College of Communications

13. 16/AP/4458 - Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures. Application UNDER CONSIDERATION.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

14. The main issues to be considered in respect of this application are:
 - a) principle in terms of land use;
 - b) transport;
 - c) amenity;
 - d) design;
 - e) flood risk;
 - f) sustainable development implications;
 - g) planning obligations;
 - f) community infrastructure levy;
 - h) other matters

Planning policy

Planning policy designations (Proposals Map)

15.
 - Central Activity Zone
 - Air Quality Management Area
 - Elephant and Castle Major Town Centre
 - Elephant and Castle Opportunity Area
 - Strategic view 23A.1 (Serpentine Bridge to Palace of Westminster)

National Planning Policy Framework (the Framework)

16.
 - Section 1 Building a strong competitive economy
 - Section 2 Ensuring the vitality and viability of town centres
 - Section 4 Promoting sustainable transport
 - Section 7 Requiring good design

National Planning Practice Guidance

The London Plan 2016

17. Policy 2.15 Town Centres
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.13 Parking
Policy 7.1 Building London's neighbourhoods and communities
Policy 7.6 Architecture

Core Strategy 2011

18. Strategic Policy 1 Sustainable Development
Strategic Policy 2 Sustainable Transport
Strategic Policy 3 Shopping, leisure and entertainment
Strategic Policy 12 Design and Conservation
Strategic Policy 13 High Environmental Standards

Southwark Plan 2007 (July) - saved policies

19. 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.

Policy 1.7 Development within town and local centres
Policy 3.2 - Protection of amenity
Policy 3.7 - Waste reduction
Policy 3.11 - Efficient use of land
Policy 3.12 - Quality in design
Policy 3.13 - Urban design
Policy 5.2 - Transport impacts
Policy 5.3 - Walking and cycling
Policy 5.6 - Car parking

Supplementary Planning Documents

20. Elephant and Castle Supplementary Planning Document (SPD) and Opportunity Area Planning Framework (OAPF) (March 2012)

Principle of development

21. The proposal seeks to provide new retail and cafe floorspace which would be entirely consistent with the town centre policies in the Core Strategy, the Saved Southwark Plan, and the Elephant and Castle SPD. It would be make a good use of unused garages and would be acceptable in land use terms. The planning application advises that the cafe space could act as a reception for the retail units and could be used for community events.
22. Concerns have been raised following public consultation on the application that the existing garages were not closed for safety reasons, but that they were going to be

closed to allow the pharmacy to be developed and were not re-opened when it was found that the pharmacy required less space than anticipated. Whilst this is noted, as set out in the transport issues section of this report the site is located in an area with excellent public transport links and where a reduction in parking would be acceptable in principle and would encourage sustainable modes of travel.

23. Guidance note 1 of the Elephant and Castle SPD requires developments providing at least 1,000sqm of retail floorspace to provide a range of shop unit sizes, including affordable units. It requires at least 10% of new retail floorspace (GIA) to be affordable for small and medium-sized enterprises in the opportunity area which have been displaced as a result of development, new business start-ups, or independent retailers (this is the SPD eligibility criteria). Suitable businesses should have 3 units or less, and rents should be discounted by not less than a total reduction of 40% below market rate, averaged over a 5 year period.
24. The proposed development would provide less than 1,000sqm of retail floorspace therefore the SPD guidance does not apply. However, the proposal has been formulated by the Council's Regeneration Division to provide affordable retail space for independent traders affected by the proposed redevelopment of the Elephant and Castle Shopping Centre site. This site includes the shopping centre, the market stalls and kiosks around it, 26-32 (evens) New Kent Road, and railway arches 6 and 7 Elephant Road, and independent traders there currently occupy around 4,005sqm of floorspace.
25. The retail units would be offered to these traders in the first instance with priority likely to be to those traders who have been there the longest. Any space left over could be occupied by other independent businesses from the shopping centre site, followed by independent businesses in the Elephant and Castle Opportunity Area which would be displaced by development and new business start-ups and this would be in accordance with guidance on affordable retail space in the Elephant and Castle SPD.
26. The Regeneration Division is currently preparing a brief for potential operators of the development. The intention is that a single operator would be appointed to manage the site, and any lease granted to an operator would stipulate that the retail units must in the first instance be offered to independent traders within the existing shopping centre site, and that their rent levels must either match those at the existing shopping centre or must comply with the SPD criteria. The process of allocating units would be overseen by Tree Shepherd, an independent business advisor which has been appointed to support traders affected by the proposed shopping centre redevelopment. Concerns have been raised during public consultation that the Council should operate the development, but the intention is that an operator with experience of managing similar developments would be brought onboard.
27. Overall the proposed development is considered to be acceptable in land use terms, and would make a sustainable use of disused garage space.

Transport issues

28. Saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse transport impacts, and that adequate servicing space is provided.
29. The site has a public transport accessibility level (PTAL) of 6b (excellent) and is located very close to both the Bakerloo Line and Northern Line underground stations at Elephant and Castle, and to Elephant and Castle overground station which adjoins the shopping centre site.

Servicing and trip generation

30. As stated, servicing for the proposed development would take place from an existing servicing area which is accessed from St George's Road. It currently provides access to the southern garages, to five car parking spaces used by the medical practice, and for servicing by the pharmacy which receives two deliveries per day including refuse collection, and these usually take place mid morning. The Design and Access Statement (DAS) advises that a meeting has been held with the Princess Street Medical Practice and the use of the loading area would not conflict with their operations.
31. Additional trip generation information has been submitted during the course of the application, and it is anticipated that the proposal would result in 3 vehicle trips per day including refuse vehicles. This would not be a significant amount and would not have an adverse impact upon the existing highway network, and delivery slots would be organised by the site manager. At the request of the Council's Highways Development Management Team vehicle tracking diagrams have been submitted which demonstrate that a 7.5 tonne delivery vehicle and a refuse truck would be able to enter and exit the site in a forward gear.

Car parking

32. Concerns have been raised by neighbouring residents regarding the permanent loss of the garages, on the basis that they should be brought back into use for people who live in Perronet House who could use them for parking, or personal and business storage.
33. The southern parking area originally contained 16 garages; four were lost when the pharmacy was constructed, leaving 12 remaining. The proposal would result in the loss of 12 of these, which the planning application advises have not been in use since 2012 when they were closed for safety reasons including anti-social behaviour. The northern parking area which is accessed from Princess Street is still in use and contains 50 garages, 29 of which are let to residents of Perronet House, 11 to other residents, and 10 are not in use as they are awaiting repair. However, eight of the disused 10 have now been repaired and will be available soon. There are seven people in Perronet House waiting for a garage, and they would be able to rent one of these garages once they are ready.
34. The site has excellent public transport links, and as such a reduction in car parking is considered to be acceptable in principle.

Cycle parking

35. The London Plan requires eight cycle parking spaces to serve the development, comprising two long stay and six short stay spaces. The proposed development would provide 10 cycle parking spaces in the form of Sheffield stands would be located outside the southern elevation of the cafe, and a condition to secure these spaces is recommended. Transport for London (TfL) have advised that cycle parking should be provided accordance with the draft new London Plan which would require one additional space, although they note that the weight to be attributed to this plan is matter for the decision maker. Given the very early stages of this plan, officers consider that it should be attributed very little weight. It is noted however, that there would be sufficient space to provide additional cycle parking if there is demand.
36. Concerns have been raised by neighbouring residents that access to the servicing area would cut across an existing cycle route. There is a dual (2 way) cycle lane outside the site which runs across the entrance to the servicing area, and cycle

superhighway 7 runs along Princess Street. Given the low number of deliveries anticipated, which would be conditioned to take place outside of peak hours, it is not considered that this would have an adverse impact upon cyclists or pedestrians including when considered cumulatively with the medical practice and pharmacy.

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

37. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding 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 permission will not be granted for development where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
38. Concerns have been raised by neighbouring residents that the proposal would result in unacceptable noise and disturbance, both through the structure and from increased use of the service yard, cooking odours, anti-social behaviour and increased litter in the area. These issues are addressed in turn below, although it is noted that flats above shops and cafes is a very common arrangement, and exists along numerous streets across Southwark and London.
39. Acoustic information has been submitted during the course of the application which has been reviewed by the Council's Environmental Protection Team (EPT). EPT are satisfied that the proposal would not result in any unacceptable noise and disturbance to neighbouring residents, including a number of flats which would sit directly above the proposed development. EPT have recommended a condition limiting plant noise, and this has been included in the draft recommendation.
40. No hours of operation for the proposed development have been provided, and EPT has recommended that they be restricted to 8am to 9pm daily. It is noted that these hours would exceed the consented hours for the existing pharmacy, which is consented to open between 8.30am-6.30pm Monday to Friday, 9am to 5pm on Saturdays, not at all on Sundays, and for four hours on Bank Holidays to provide emergency pharmaceutical cover. However, the Environmental Protection Team was not consulted on either of the applications for the pharmacy, and the consented hours simply reflected the hours which the applicant applied for. EPT has confirmed that no noise complaints have been received related to the pharmacy, and given the town centre location, the hours of use for the proposed development suggested by EPT are have been included in the draft recommendation.
41. As stated there could be up to 24 chairs outside the proposed cafe, on the south-eastern corner of the building. If planning permission is granted, the applicant would need to obtain a Tables and Chairs licence from the Council for any external seating which would consider whether adequate footway widths would be retained. It is understood that these licences do not cover hours of use, therefore the hours of use condition should also apply to any outside seating.
42. Servicing for the proposed development would take place from the servicing area off St George's Road, which is overlooked by a number of flats in Perronet House. For transport reasons, servicing would need to take place outside peak hours. It is recommended that a condition be imposed only allowing servicing to take place between 9am and 4pm Monday to Friday, 10am to 4pm on Saturday and not at all on Sundays or Bank Holidays, in order to protect the amenity of neighbouring occupiers. Only three servicing vans are anticipated per day and, subject to these hours, this

should not generate significant amounts of noise or disturbance.

43. With regard to cooking odours, no primary cooking would take place in the cafe. Items served would include hot and cold drinks, sandwiches, and warmed foods such as re-heated soups. EPT has recommended that this be secured by way of condition, to ensure that there would be no loss of amenity to neighbouring residents.
44. Concerns have been raised by neighbouring residents that anti-social behaviour which takes place around the existing shopping centre could end up gravitating towards Perronet House as a result of the proposal. Whilst this is noted, the Perronet House proposals are of a much smaller scale than the shopping centre and any instances of anti-social behaviour would be dealt with by the site manager. The planning application advises that the area around Perronet House and within the existing garages are already subject to anti-social behaviour and the proposal would bring the unused garages into active use and would increase natural surveillance of the area.
45. A dedicated refuse store would be provided within the building and a condition to secure this is recommended. Cafe staff would be responsible for keeping the external seating area clean and tidy. It is noted that there are three bins in the public realm around the site.
46. Concerns have also been raised by neighbouring residents that the existing first floor overhang around the south-eastern corner of the building is too low and should be omitted. The plans show that this is approximately 2.4m above ground floor level, which is a typical floor to ceiling height within a residential property. The proposal does not include the removal of the overhang.

Design issues

47. Saved policies 3.12 and 3.13 of the Southwark Plan seek to ensure that developments are of a high standard of architectural and urban design.
48. Concerns have been raised by neighbouring residents that the external alterations proposed would be out of character with the building, that existing shops in Elephant and Castle Shopping Centre have a poor aesthetic and untidy appearance and that Perronet House residents would have no input into how traders would present their stores.
49. The existing garages are enclosed by brick walls with ventilation louvres and metal roller shutters. They present a dead frontage to the street and offer very little to the public realm. The proposed development would introduce a large new shopfront which would provide an active frontage to the building and activate the public realm in front of it and this is considered to be a significant improvement to the existing situation. The external alterations are considered to be appropriate in terms of their design and materials, and would enhance the appearance of the building.
50. The majority of the new shopfront would be taken up by the cafe with all but one of the retail units having internal shopfronts which would face each other across the 3.8m wide arcade. Any advertisements proposed to the cafe or the street-facing retail unit would likely require separate advertisement consent, whereby the impact upon amenity and public safety would be taken into account. The site manager is also likely to have a role in how the units would be advertised and a coherent advertising strategy for the units could be developed.
51. All but one of the retail units would have a frontage to the street and this approach has been questioned as to whether it would provide the retail units with adequate

prominence to promote trade. Retail arcades are not uncommon, however, and the proposal has been influenced by the Tiendas Del Sur retail arcade, a Latin American shopping centre which is located on the ground floor of Sherston House to the south of the site and which also has flats directly above. This shopping arcade has a hairdresser / barber shop and a grocery shop either side of the entrance to the arcade. One of the units is a cafe which has seating in the centre of the arcade and there are further shops around the edge of the space looking onto the seating area. This approach appears to work well and the arcade appeared well used on a number of visits to the site.

52. The layout of the proposed units would be flexible, allowing their size and shape to be altered depending on demand for traders. The proposal would form a small cluster of businesses, and the ability to form clusters is something traders at the shopping centre have expressed as being important to them.
53. The minor nature of the external alterations would be acceptable, and officers consider that they would enhance the appearance of the building and improve the public realm around it. The proposal would not affect the setting of any nearby heritage assets including the Faraday Memorial and the Elliot's Row Conservation Area. Overall the design of the proposal is considered to be acceptable.

Flood risk

54. The site is located in flood risk zone 3 which has a high probability of flooding. A flood risk assessment (FRA) has been submitted in support of the application and has been reviewed by the Environment Agency and the Council's Flood Risk and Drainage Team. The Environment Agency does not wish to make any comments on the application, and the Flood Risk and Drainage Team initially requested that the finished floor levels within the building be raised. This would not be possible owing to the existing floor to ceiling height therefore the Flood Risk and Drainage Team have recommended a condition requiring a flood evacuation plan to be submitted for approval and this has been included in the draft recommendation.

Sustainable development implications

55. The proposed development would make use of a disused garages and the reduction in car parking would encourage sustainable modes of travel. The proposed shopfronts would be double-glazed.

Community infrastructure levy (CIL)

56. The proposed development would not be CIL liable because the parking is ancillary to a wider building which is in lawful use.

Other matters

Community consultation

57. Neighbouring residents have raised concerns that pre-application consultation on the application showed that most Perronet House residents are not in favour of the proposals.
58. Details of consultation undertaken by the applicant before the planning application was submitted are set out in the Design and Access Statement (DAS). Consultation events were held in Perronet House on 13-14 September 2017 and were attended by 8 residents, and consultation boards were displayed on the Council's website. The boards and a model of the development were then displayed at Tree Shepherd's

office in the Elephant and Castle Shopping Centre. A drop in session for traders was held at the shopping centre to discuss both the shopping centre redevelopment proposals and the Perronet House proposals.

59. Feedback received comprised:

- Concerns about a publicly accessible east-west route through the site;
- Loss of parking and storage;
- Existing anti-social behaviour and
- Quality of the proposed retail units.

60. To address some of these concerns the proposed door in the western entrance was subsequently changed to emergency access only, disused garages in the northern parking area have been repaired, the width of the arcade was widened to create more circulation space, and it was agreed that a single operator would be appointed to manage the site. At the request of the Princess Street Medical Practice dropped bollards were included on the plans which would prevent unauthorised use of the doctors' parking spaces. The pharmacy raised concerns regarding potential impact on their air conditioning unit, and a perforated screen is proposed to separate the equipment and to allow them both to operate as normal.

Fire safety

61. Concerns have been raised by a neighbouring resident that the proposal would increase fire risk in the block and that Perronet House has no sprinklers or communal fire alarms. As stated, if planning permission is granted the applicant will need to obtain Building Regulations Approval which considers fire safety matters.

Determination of the application

62. Concerns have been raised by a neighbouring resident that, as the Council is the applicant, the Council should not determine the application. Whilst this is noted, the Council is able to determine its own applications. The proposal has been subject to public consultation; the Planning Committee which will determine the application does not have a role in managing Perronet House and the committee meeting is open to the public.

Conclusion on planning issues

63. The proposed development would provide additional retail floorspace in the Elephant and Castle town centre which would be acceptable in land use terms. Although the proposal would result in a loss of parking, the garages have not been used since 2012 and the site is in an area with excellent public transport links and the Council is bringing 8 unused garages in the northern parking area back into use. A number of conditions are recommended to ensure that there would be no loss of amenity to neighbouring residential occupiers, and the design of the proposal would be acceptable. It is therefore recommended that planning permission be granted, subject to conditions.

Community impact statement

64. 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.
- b) The following issues relevant to particular communities/groups likely to be affected by the proposal have been identified above.
- c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above.

Consultations

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

Consultation replies

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

Summary of consultation responses

Environmental Protection Team

- 67. Initial recommendation for refusal based on lack of information. Acoustic information subsequently submitted which demonstrates that the proposal would not cause a loss of amenity to the flats above. To further ensure no loss of amenity, conditions relating to hours of use (8am to 9pm), plant noise and no primary cooking at the cafe are recommended.

Highways Development Management

- 68. Applicant to demonstrate that servicing vehicles can enter and exit the site in forward gear (vehicle tracking required).
- 69. Informative required: A temporary license will be required in order to place tables and seating on street space.
- 70. Subsequent comment that the vehicle tracking would be acceptable.

Flood and Drainage Team

- 71. Initial concerns that insufficient detail provided, but given that the proposal is for a less vulnerable use a condition for an emergency flood evacuation plan is recommended. Generally recommend that flood resilience measures be put in place. No drainage strategy has been provided, however, minimal external changes are proposed.

Transport for London

- 72. - The site is adjacent to St Georges Road and London Road and the former Elephant and Castle gyratory which all form part of the Transport for London Road Network (TLRN). St George's Road forms part of Cycle Superhighway 6.
- The footway and carriageway on the TLRN at St George's Road, London Road and the Elephant and Castle must not be blocked during the construction works. Temporary obstructions must be kept to a minimum and should not encroach on space needed for safe passage for pedestrians and should not obstruct the flow of traffic. No skips or construction materials shall be kept on the footway or carriageway on the TLRN at any time and TfL scaffolding / hoarding licences may be

required.

- All vehicles associated with the proposal must only park/ stop at permitted locations and within the time periods permitted by existing on-street restrictions.

- TfL will need to be consulted on any signage proposed for the development and given the café frontage onto the TLRN licences will be required for the operation of tables and chairs if they spill out of the site's red line boundary and onto the public highway.

- TfL welcome the associated public realm improvements proposed for the site frontage.

- Given the site's excellent PTAL of 6b and the ongoing improvements at Elephant and Castle to improve the public realm, a car-free proposal is supported. Additionally, the principle of change of use from parking garage to A1/A3 use is supported.

- The 10 proposed cycle parking spaces conform with London Plan 2016 and would be accessible and secure.

- Cycle parking should comply with the draft new London Plan (November 2017) which would require 1 short-stay and 1 long-stay cycle parking spaces.

- Delivery and servicing will take place from the existing rear service yard currently used by Perronet House and the adjacent St George's Pharmacy. All vehicles entering and exiting the servicing area must do so in forward gear and no vehicles must wait on the red route or encroach upon the TLRN public highway. Deliveries should be timed outside of peak hours and booked to avoid conflict with other service bay users.

- Provided the above guidance is followed, TfL Spatial Planning offers no objections to the proposed change of use in this location

73. Two representations have been received in support of the application on the following grounds:

- Would provide more retail choice for residents;
- There is little retail provision on the western side of Elephant and Castle and along St George's Road and the surrounding streets;
- The site is located in Elephant and Castle Town Centre and new retail is in accordance with the NPPF;
- Would provide independent retailers with an opportunity to relocate;
- Good lighting and internal design would be essential to the success of the new retail units;
- Prominent signage would help to increase the visibility of the shops;
- Should consider whether the projecting elements of the building could be removed, given their low height;
- The site has a PTAL of 6b, with exceptional public transport links;
- The loss of the car parking spaces should not outweigh the benefits of additional retail floorspace for independent businesses in the area;
- Would improve the safety of the area.

74. Six representations have been received objecting to the application on the following grounds:

- Noise and disturbance;
- Safety and anti-social behaviour, including more people being able to access the

block;

- Impact upon pedestrians and cyclists;
- Loss of the garages;
- Existing shops within the shopping centre have a poor aesthetic and are unsightly;
- Increased litter;
- Lack of consideration for Perronet House residents, and pre-application consultation showed that most residents do not support the development;
- Fire risk;
- External alterations would change the character of the building / potential for unsuitable advertisements;
- There is a waiting list for garages;
- The Council should be refurbishing and maintaining the existing garages for residents, not changing them to shops;
- Untrue that the garages were closed due to anti-social behaviour; they were closed to accommodate the pharmacy;
- Property devaluation - officer response - this is not a material planning consideration and cannot be taken into account.
- Poor quality new retail space would be provided;
- The developer for the shopping centre application should be providing space for traders, not Perronet House;
- Cooking odours;
- The building overhang on the east elevation is very low and more people would walk beneath it to access the shops and cafe.
- As the council is the applicant, the council should not determine the application;
- The council should manage the development, not an independent operator.

Human rights implications

75. 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.
76. This application has the legitimate aim of providing a cafe and retail units. 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/1399-67 Application file: 17/AP/4651 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquires telephone: 020 7525 5403 Planning enquires email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5410 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning		
Report Author	Victoria Lewis, Team Leader		
Version	Final		
Dated	23 June 2018		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments included	
Strategic Director of Finance & Governance	No	No	
Strategic Director of Environment and Social Regeneration	No	No	
Strategic Director of Housing and Modernisation	No	No	
Director of Regeneration	No	No	
Date final report sent to Constitutional Team		23 June 2018	

APPENDIX 1**Consultation undertaken****Site notice date:** 09/01/2018**Press notice date:** n/a**Case officer site visit date:** n/a**Neighbour consultation letters sent:** 10/01/2018**Internal services consulted:**

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

Flood and Drainage Team

Highway Development Management

Statutory and non-statutory organisations consulted:

Environment Agency

Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

219 Shopping Centre Elephant And Castle SE1 6TE

Unit 37 The Artworks SE17 1AY

Unit 38 The Artworks SE17 1AY

Unit 39 The Artworks SE17 1AY

Unit 34 The Artworks SE17 1AY

Unit 35 The Artworks SE17 1AY

Unit 36 The Artworks SE17 1AY

Unit 40 The Artworks SE17 1AY

48 St Georges Road London SE1 6ET

133c Elephant Road London SE17 1LB

Railway Arch 113 Elephant Road SE17 1LB

Unit 41 The Artworks SE17 1AY

Unit 42 The Artworks SE17 1AY

Unit 43 The Artworks SE17 1AY

Unit 24 The Artworks SE17 1AY

Unit 25 The Artworks SE17 1AY

Unit 26 The Artworks SE17 1AY

Unit 15 Shopping Centre SE17 1AY

Unit 22 The Artworks SE17 1AY

Unit 23 The Artworks SE17 1AY

Unit 27 The Artworks SE17 1AY

Unit 31 The Artworks SE17 1AY

Unit 32 The Artworks SE17 1AY

Unit 33 The Artworks SE17 1AY

Unit 28 The Artworks SE17 1AY

Unit 29 The Artworks SE17 1AY

Unit 30 The Artworks SE17 1AY

26 Princess Street London SE1 6HJ

28 Princess Street London SE1 6HJ

30 Princess Street London SE1 6HJ

20 Princess Street London SE1 6HJ

22 Princess Street London SE1 6HJ

24 Princess Street London SE1 6HJ

32 Princess Street London SE1 6HJ

40 Princess Street London SE1 6HJ

42 Princess Street London SE1 6HJ

Flat 1 Perronet House Gaywood Estate SE1 6JR

Flat 36 Perronet House Gaywood Estate SE1 6JR

Flat 37 Perronet House Gaywood Estate SE1 6JR

Flat 38 Perronet House Gaywood Estate SE1 6JR

Flat 5 Perronet House Gaywood Estate SE1 6JR

Flat 9 Perronet House Gaywood Estate SE1 6JR

Flat 41 Perronet House Gaywood Estate SE1 6JS

Flat 42 Perronet House Gaywood Estate SE1 6JS

Flat 6 Perronet House Gaywood Estate SE1 6JR

Flat 7 Perronet House Gaywood Estate SE1 6JR

Flat 8 Perronet House Gaywood Estate SE1 6JR

309 Shopping Centre Elephant And Castle SE1 6TB

310 Shopping Centre Elephant And Castle SE1 6TB

311 Shopping Centre Elephant And Castle SE1 6TB

307 Shopping Centre Elephant And Castle SE1 6TB

308 Shopping Centre Elephant And Castle SE1 6TB

Store 1 Rear Of 308 To 309 Shopping Centre SE1 6TE

312 Shopping Centre Elephant And Castle SE1 6TB

317 Shopping Centre Elephant And Castle SE1 6TB

318 Shopping Centre Elephant And Castle SE1 6TB

319 Shopping Centre Elephant And Castle SE1 6TB

313 Shopping Centre Elephant And Castle SE1 6TB

314-315 Shopping Centre Elephant And Castle SE1 6TB

316 Shopping Centre Elephant And Castle SE1 6TB

Rear 238 Shopping Centre SE1 6TE

239 Shopping Centre Elephant And Castle SE1 6TE

240 Shopping Centre Elephant And Castle SE1 6TE

235 Shopping Centre Elephant And Castle SE1 6TE

236 Shopping Centre Elephant And Castle SE1 6TE

Front 238 Shopping Centre SE1 6TE

241 Shopping Centre Elephant And Castle SE1 6TE

300-304 Shopping Centre Elephant And Castle SE1 6TB

305 Shopping Centre Elephant And Castle SE1 6TB

306 Shopping Centre Elephant And Castle SE1 6TB

242-245 Shopping Centre Elephant And Castle SE1 6TE

254-255 Shopping Centre Elephant And Castle SE1 6TE

256-257 Shopping Centre Elephant And Castle SE1 6TE

320-322 Shopping Centre Elephant And Castle SE1 6TB

34 Princess Street London SE1 6HJ
 36 Princess Street London SE1 6HJ
 38 Princess Street London SE1 6HJ
 Kiosk 2 Shopping Centre SE1 6TE
 Kiosk 3 Shopping Centre SE1 6TE
 Kiosk 4 Shopping Centre SE1 6TE
 46 St Georges Road London SE1 6ET
 Newington Temporary Library The Artworks SE17 1LB
 Kiosk 1 Shopping Centre SE1 6TE
 Kiosk 5 Shopping Centre SE1 6TE
 Kiosk 9 Shopping Centre SE1 6TE
 Kiosk 10 Shopping Centre SE1 6TE
 2 Princess Street London SE1 6JP
 Kiosk 6 Shopping Centre SE1 6TE
 Kiosk 7 Shopping Centre SE1 6TE
 Kiosk 8 Shopping Centre SE1 6TE
 Pitch 8 Shopping Centre SE1 6TE
 Pitch 9 Shopping Centre SE1 6TE
 Pitch 10 Shopping Centre SE1 6TE
 Pitch 5 Shopping Centre SE1 6TE
 Pitch 6 Shopping Centre SE1 6TE
 Pitch 7 Shopping Centre SE1 6TE
 Pitch 11 Shopping Centre SE1 6TE
 Pitch 15 Shopping Centre SE1 6TE
 Pitch 16 And C11 Shopping Centre SE1 6TE
 Pitch 17 Shopping Centre SE1 6TE
 Pitch 12 Shopping Centre SE1 6TE
 Pitch 13 Shopping Centre SE1 6TE
 Pitch 14 Shopping Centre SE1 6TE
 Container C10 Shopping Centre SE1 6TE
 Container C11 Shopping Centre SE1 6TE
 Container C12 Shopping Centre SE1 6TE
 Container C7 Shopping Centre SE1 6TE
 Container C8 Shopping Centre SE1 6TE
 Container C9 Shopping Centre SE1 6TE
 Container C13 Shopping Centre SE1 6TE
 Pitch 2 Shopping Centre SE1 6TE
 Pitch 3 Shopping Centre SE1 6TE
 Pitch 4 Shopping Centre SE1 6TE
 Container C14 Shopping Centre SE1 6TE
 Container C15 Shopping Centre SE1 6TE
 Pitch 1 Shopping Centre SE1 6TE
 Pitch 18 Shopping Centre SE1 6TE
 Pitch 37 Shopping Centre SE1 6TE
 Pitch 38 Shopping Centre SE1 6TE
 Pitch 39 Shopping Centre SE1 6TE
 Pitch 34 Shopping Centre SE1 6TE
 Pitch 35 Shopping Centre SE1 6TE
 Pitch 36 Shopping Centre SE1 6TE
 Pitch 40 Shopping Centre SE1 6TE
 Pitch 44 Shopping Centre SE1 6TE
 Pitch 45 Shopping Centre SE1 6TE
 Pitch 46 Shopping Centre SE1 6TE
 Pitch 41 Shopping Centre SE1 6TE
 Pitch 42 Shopping Centre SE1 6TE
 Pitch 43 Shopping Centre SE1 6TE
 Pitch 22 Shopping Centre SE1 6TE
 Pitch 23 Shopping Centre SE1 6TE
 Pitch 24 Shopping Centre SE1 6TE
 Pitch 19 Shopping Centre SE1 6TE
 Pitch 20 Shopping Centre SE1 6TE
 Pitch 21 Shopping Centre SE1 6TE
 Pitch 25 Shopping Centre SE1 6TE
 Pitch 29 Shopping Centre SE1 6TE
 Pitch 30 And 31 Shopping Centre SE1 6TE
 Pitch 32 And 33 Shopping Centre SE1 6TE
 Pitch 26 Shopping Centre SE1 6TE
 Pitch 27 Shopping Centre SE1 6TE
 Pitch 28 Shopping Centre SE1 6TE
 Flat 10 Perronet House Gaywood Estate SE1 6JR
 Flat 72 Perronet House Gaywood Estate SE1 6JS
 Flat 73 Perronet House Gaywood Estate SE1 6JS
 Flat 74 Perronet House Gaywood Estate SE1 6JS
 Flat 69 Perronet House Gaywood Estate SE1 6JS
 Flat 70 Perronet House Gaywood Estate SE1 6JS
 Flat 71 Perronet House Gaywood Estate SE1 6JS
 Flat 75 Perronet House Gaywood Estate SE1 6JS
 Flat 79 Perronet House Gaywood Estate SE1 6JS
 Flat 80 Perronet House Gaywood Estate SE1 6JS

15 Elephant And Castle London SE1 6TB
 237b Shopping Centre Elephant And Castle SE1 6TE
 237a Shopping Centre Elephant And Castle SE1 6TE
 330 Shopping Centre Elephant And Castle SE1 6TB
 331-332 Shopping Centre Elephant And Castle SE1 6TB
 335-336 Shopping Centre Elephant And Castle SE1 6TB
 323-324 Shopping Centre Elephant And Castle SE1 6TB
 325 Shopping Centre Elephant And Castle SE1 6TB
 329 Shopping Centre Elephant And Castle SE1 6TB
 338-339 Shopping Centre Elephant And Castle SE1 6TB
 341-343 Shopping Centre Elephant And Castle SE1 6TB
 353 Shopping Centre Elephant And Castle SE1 6TB
 339 Shopping Centre Elephant And Castle SE1 6TB
 340 Shopping Centre Elephant And Castle SE1 6TB
 340a Shopping Centre Elephant And Castle SE1 6TB
 Unit 231 Shopping Centre SE1 6TE
 Unit 234 And 235 Shopping Centre SE1 6TE
 Unit 236 And 237 And 337 Shopping Centre SE1 6SZ
 Unit 215 And 216 Shopping Centre SE1 6TE
 Unit 217 Shopping Centre SE1 6TE
 Unit 220 To 223 Shopping Centre SE1 6TE
 Unit 238 Shopping Centre SE1 6TE
 Unit 320 Shopping Centre SE1 6TB
 Unit 321 Shopping Centre SE1 6TB
 Unit 322 Shopping Centre SE1 6TB
 Unit 250 Shopping Centre SE1 6TE
 Unit 252 Shopping Centre SE1 6TE
 Unit 306 And 308 Shopping Centre SE1 6TB
 Centre Unit Shopping Centre SE1 6TE
 First Floor Shopping Centre SE1 6TE
 224 To 230 And 326 To 328 Shopping Centre SE1 6TE
 Part Basement Shopping Centre SE1 6TE
 Faraday Suite Part First Floor Shopping Centre SE1 6TE
 Store T Shopping Centre SE1 6TB
 Unit 200 Shopping Centre SE1 6TE
 Unit 211 And 212 Shopping Centre SE1 6TE
 Glass Unit Coffee Point Shopping Centre SE1 6TE
 Kiosk Shopping Centre SE1 6TB
 Store I Shopping Centre SE1 6TF
 Unit 333 Shopping Centre SE1 6TB
 211 Shopping Centre Elephant And Castle SE1 6TE
 212 Shopping Centre Elephant And Castle SE1 6TE
 213 Shopping Centre Elephant And Castle SE1 6TE
 207-208 Shopping Centre Elephant And Castle SE1 6TE
 209 Shopping Centre Elephant And Castle SE1 6TE
 210 Shopping Centre Elephant And Castle SE1 6TE
 214 Shopping Centre Elephant And Castle SE1 6TE
 222-223 Shopping Centre Elephant And Castle SE1 6TE
 232-233 Shopping Centre Elephant And Castle SE1 6TE
 234 Shopping Centre Elephant And Castle SE1 6TE
 218 Shopping Centre Elephant And Castle SE1 6TE
 219 Shopping Centre Elephant And Castle SE1 6TE
 220-221 Shopping Centre Elephant And Castle SE1 6TE
 Unit 352 Shopping Centre SE1 6TB
 Workshop 2 Shopping Centre SE1 6TE
 Workshop 3 Shopping Centre SE1 6TE
 Unit 338 Shopping Centre SE1 6TA
 Unit 340b Shopping Centre SE1 6TB
 Unit 344 Shopping Centre SE1 6TB
 Workshop 4 Shopping Centre SE1 6TE
 204 Shopping Centre Elephant And Castle SE1 6TE
 205 Shopping Centre Elephant And Castle SE1 6TE
 206 Shopping Centre Elephant And Castle SE1 6TE
 Workshop 5 Shopping Centre SE1 6TE
 Workshops 1 And 6 Shopping Centre SE1 6TE
 203 Shopping Centre Elephant And Castle SE1 6TE
 Unit V Seventh Floor Hannibal House SE1 6TE
 Unit W Seventh Floor Hannibal House SE1 6TE
 Unit X Seventh Floor Hannibal House SE1 6TE
 Unit S Seventh Floor Hannibal House SE1 6TE
 Unit T Seventh Floor Hannibal House SE1 6TE
 Unit U Seventh Floor Hannibal House SE1 6TE
 Unit Y Seventh Floor Hannibal House SE1 6TE
 Unit 1 3 Elephant Road SE1 1LB
 Unit Z Seventh Floor Hannibal House SE1 6TE
 202 Shopping Centre SE1 6TE
 Unit 3a Shopping Centre SE1 6TE
 Unit I Seventh Floor Hannibal House SE1 6TE
 Unit J Seventh Floor Hannibal House SE1 6TE

Flat 81 Perronet House Gaywood Estate SE1 6JS
 Flat 76 Perronet House Gaywood Estate SE1 6JS
 Flat 77 Perronet House Gaywood Estate SE1 6JS
 Flat 78 Perronet House Gaywood Estate SE1 6JS
 Flat 59 Perronet House Gaywood Estate SE1 6JS
 Flat 60 Perronet House Gaywood Estate SE1 6JS
 Flat 61 Perronet House Gaywood Estate SE1 6JS
 Flat 56 Perronet House Gaywood Estate SE1 6JS
 Flat 57 Perronet House Gaywood Estate SE1 6JS
 Flat 58 Perronet House Gaywood Estate SE1 6JS
 Flat 62 Perronet House Gaywood Estate SE1 6JS
 Flat 66 Perronet House Gaywood Estate SE1 6JS
 Flat 67 Perronet House Gaywood Estate SE1 6JS
 Flat 68 Perronet House Gaywood Estate SE1 6JS
 Flat 63 Perronet House Gaywood Estate SE1 6JS
 Flat 64 Perronet House Gaywood Estate SE1 6JS
 Flat 65 Perronet House Gaywood Estate SE1 6JS
 Flat 82 Perronet House Gaywood Estate SE1 6JS
 Unit 6 Farrell Court SE17 1LB
 Unit 7 Farrell Court SE17 1LB
 Unit 8 Farrell Court SE17 1LB
 Unit 1 Farrell Court SE17 1LB
 Unit 2 Farrell Court SE17 1LB
 Unit 3 Farrell Court SE17 1LB
 Coronet Cinema 28 New Kent Road SE1 6TJ
 Unit 5 Perronet House Gaywood Estate SE1 6JR
 Flat 86 Perronet House Gaywood Estate SE1 6JS
 Flat 87 Perronet House Gaywood Estate SE1 6JS
 Flat 88 Perronet House Gaywood Estate SE1 6JS
 Flat 83 Perronet House Gaywood Estate SE1 6JS
 Flat 84 Perronet House Gaywood Estate SE1 6JS
 Flat 85 Perronet House Gaywood Estate SE1 6JS
 Flat 89 Perronet House Gaywood Estate SE1 6JS
 30 New Kent Road London SE1 6TJ
 34 New Kent Road London SE1 6TJ
 Elephant And Castle Railway Station Elephant Road SE17 1LB
 Flat 90 Perronet House Gaywood Estate SE1 6JS
 The Charlie Chaplin 26 New Kent Road SE1 6TJ
 32 New Kent Road London SE1 6TJ
 Flat 26 Perronet House Gaywood Estate SE1 6JR
 Flat 27 Perronet House Gaywood Estate SE1 6JR
 Flat 28 Perronet House Gaywood Estate SE1 6JR
 Flat 23 Perronet House Gaywood Estate SE1 6JR
 Flat 24 Perronet House Gaywood Estate SE1 6JR
 Flat 25 Perronet House Gaywood Estate SE1 6JR
 Flat 29 Perronet House Gaywood Estate SE1 6JR
 Flat 32 Perronet House Gaywood Estate SE1 6JR
 Flat 33 Perronet House Gaywood Estate SE1 6JR
 Flat 34 Perronet House Gaywood Estate SE1 6JR
 Flat 3 Perronet House Gaywood Estate SE1 6JR
 Flat 30 Perronet House Gaywood Estate SE1 6JR
 Flat 31 Perronet House Gaywood Estate SE1 6JR
 Flat 14 Perronet House Gaywood Estate SE1 6JR
 Flat 15 Perronet House Gaywood Estate SE1 6JR
 Flat 16 Perronet House Gaywood Estate SE1 6JR
 Flat 11 Perronet House Gaywood Estate SE1 6JR
 Flat 12 Perronet House Gaywood Estate SE1 6JR
 Flat 13 Perronet House Gaywood Estate SE1 6JR
 Flat 17 Perronet House Gaywood Estate SE1 6JR
 Flat 20 Perronet House Gaywood Estate SE1 6JR
 Flat 21 Perronet House Gaywood Estate SE1 6JR
 Flat 22 Perronet House Gaywood Estate SE1 6JR
 Flat 18 Perronet House Gaywood Estate SE1 6JR
 Flat 19 Perronet House Gaywood Estate SE1 6JR
 Flat 2 Perronet House Gaywood Estate SE1 6JR
 Flat 35 Perronet House Gaywood Estate SE1 6JR
 Flat 46 Perronet House Gaywood Estate SE1 6JS
 Flat 47 Perronet House Gaywood Estate SE1 6JS
 Flat 48 Perronet House Gaywood Estate SE1 6JS
 Flat 43 Perronet House Gaywood Estate SE1 6JS
 Flat 44 Perronet House Gaywood Estate SE1 6JS
 Flat 45 Perronet House Gaywood Estate SE1 6JS
 Flat 49 Perronet House Gaywood Estate SE1 6JS
 Flat 53 Perronet House Gaywood Estate SE1 6JS
 Flat 54 Perronet House Gaywood Estate SE1 6JS
 Flat 55 Perronet House Gaywood Estate SE1 6JS
 Flat 50 Perronet House Gaywood Estate SE1 6JS
 Flat 51 Perronet House Gaywood Estate SE1 6JS
 Unit K Seventh Floor Hannibal House SE1 6TE
 Unit F Seventh Floor Hannibal House SE1 6TE
 Unit G Seventh Floor Hannibal House SE1 6TE
 Unit H Seventh Floor Hannibal House SE1 6TE
 Unit L Seventh Floor Hannibal House SE1 6TE
 Unit P Seventh Floor Hannibal House SE1 6TE
 Unit Q Seventh Floor Hannibal House SE1 6TE
 Unit R Seventh Floor Hannibal House SE1 6TE
 Unit M Seventh Floor Hannibal House SE1 6TE
 Unit N Seventh Floor Hannibal House SE1 6TE
 Unit O Seventh Floor Hannibal House SE1 6TE
 Unit 1 The Artworks SE17 1AY
 Unit 18 The Artworks SE17 1AY
 Unit 19 The Artworks SE17 1AY
 Unit 20 The Artworks SE17 1AY
 Unit 15 The Artworks SE17 1AY
 Unit 16 The Artworks SE17 1AY
 Unit 17 The Artworks SE17 1AY
 Unit 21 The Artworks SE17 1AY
 Container C4 Shopping Centre SE1 6TE
 Container C5 Shopping Centre SE1 6TE
 Container C6 Shopping Centre SE1 6TE
 Container C1 Shopping Centre SE1 6TE
 Container C2 Shopping Centre SE1 6TE
 Container C3 Shopping Centre SE1 6TE
 Unit 5 The Artworks SE17 1AY
 Unit 6 The Artworks SE17 1AY
 Unit 7 The Artworks SE17 1AY
 Unit 2 The Artworks SE17 1AY
 Unit 3 The Artworks SE17 1AY
 Unit 4 The Artworks SE17 1AY
 Unit 8 The Artworks SE17 1AY
 Unit 12 The Artworks SE17 1AY
 Unit 13 The Artworks SE17 1AY
 Unit 14 The Artworks SE17 1AY
 Unit 9 The Artworks SE17 1AY
 Unit 10 The Artworks SE17 1AY
 Unit 11 The Artworks SE17 1AY
 Palatial Leisure Ltd Shopping Centre SE1 6TE
 Part First Floor Superbowl Shopping Centre SE1 6TE
 200-201 Shopping Centre Elephant And Castle SE1 6TE
 253 Shopping Centre Elephant And Castle SE1 6TE
 333 334 Part 335 And Store H Shopping Centre SE1 6TB
 The Moat Shopping Centre SE1 6TE
 Eleventh Floor Hannibal House SE1 6TE
 Twelfth Floor Hannibal House SE1 6TE
 Seventh Floor Hannibal House SE1 6TE
 Fifth Floor Hannibal House SE1 6TE
 Ninth Floor Hannibal House SE1 6TE
 Tenth Floor Hannibal House SE1 6TE
 Unit 340 Shopping Centre SE1 6TB
 Unit 211 Shopping Centre SE1 6TE
 Unit 237 To 239 Shopping Centre SE1 6TE
 Railway Arch 1 Elephant Mews SE17 1LB
 Railway Arch 3 Elephant Mews SE17 1LB
 Railway Arch 2 Elephant Mews SE17 1LB
 Unit 234 To 235 Shopping Centre SE1 6TE
 237c And D238 Shopping Centre SE1 6TE
 Unit 17 Shopping Centre SE1 6SZ
 337 Shopping Centre Elephant And Castle SE1 6TE
 Unit 350 Shopping Centre SE1 6TB
 Sixth Floor Hannibal House SE1 6TE
 Railway Arch 4 Elephant Mews SE17 1LB
 Railway Arch 5 Elephant Mews SE17 1LB
 Railway Arch 6 Elephant Mews SE17 1LB
 Unit C Seventh Floor Hannibal House SE1 6TE
 Unit D Seventh Floor Hannibal House SE1 6TE
 Unit E Seventh Floor Hannibal House SE1 6TE
 Unit A Seventh Floor Hannibal House SE1 6TE
 Unit B Seventh Floor Hannibal House SE1 6TE
 Community Action Southwark Eighth Floor Hannibal House SE1 6TE
 Unit 4 And Unit 5 Farrell Court SE17 1LB
 Second Floor Hannibal House SE1 6TE
 Third Floor Hannibal House SE1 6TE
 Fourth Floor Hannibal House SE1 6TE
 Living Accommodation The Charlie Chaplin SE1 6TJ
 Princess Street Medical Practice 2 Princess Street SE1 6JP
 St George'S Pharmacy 46 St George'S Road SE1 6ET

Flat 52 Perronet House Gaywood Estate SE1 6JS
 Flat 39 Perronet House Gaywood Estate SE1 6JR
 Flat 4 Perronet House Gaywood Estate SE1 6JR
 Flat 40 Perronet House Gaywood Estate SE1 6JR

17 Dawkins Court 2 Garland Close SE1 6AY
 25 Gaywood Street London SE1 6HG
 50 Perronet House Princess Street SE1 6JS
 By Email

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

None

Statutory and non-statutory organisations

Environment Agency

Neighbours and local groups

By Email
 Flat 54 Perronet House Gaywood Estate SE1 6JS
 Flat 64 Perronet House Gaywood Estate SE1 6JS
 Flat 76 Perronet House Gaywood Estate SE1 6JS
 17 Dawkins Court 2 Garland Close SE1 6AY
 20 Princess Street London SE1 6HJ
 25 Gaywood Street London SE1 6HG

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 Dan Taylor Southwark Council	Reg. Number	17/AP/4651
Application Type	Full Planning Application	Case Number	TP/1399-67
Recommendation	Grant permission		

Draft of Decision Notice

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

Change of use of 12 existing garages / parking spaces to provide retail space (use class A1), café space (use class A3) and ancillary storage / plant and servicing space, together with new glazing and doors to south, east and west elevations.

At: GROUND FLOOR, PERRONET HOUSE GAYWOOD ESTATE, PRINCESS STREET, LONDON, SE1 6JR

In accordance with application received on 12/12/2017 16:02:38

and Applicant's Drawing Nos. Existing plans

17PER-P020, 17PER-P012, 17PER-P010, 17PER-P003, 17PER-P011, 17PER-P002, 17PER-P300,

Proposed plans

17PER-P202, 17PER-P101, 17PER-P001, M000388-TR-001 Rev B, M000388-TR-002 Rev B,

Design and Access Statement dated December 2017, Flood Risk Assessment dated December 2017, Perronet Garages Sound Insulation dated 19th February 2018, trip generation documents (x2).

Subject to the following eleven 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:

17PER-P202, 17PER-P101, 17PER-P001, M000388-TR-001 Rev B, M000388-TR-002 Rev B.

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-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.

- 3 Before the development hereby permitted is occupied, a flood emergency and evacuation plan shall be submitted to and approved by the local planning authority (in consultation with the emergency planning team) including details of how occupants will be informed about and recommended to sign up to the Environment Agency Flood Warning Service. The flood emergency and evacuation plan shall be implemented on first occupation and carried out in accordance with the approved details.

Reason

To ensure future occupiers are made aware of the flooding risk to this site within flood zone 3 in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and saved policy 3.9 Water of the Southwark Plan 2007.

- 4 The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014. Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results shall be submitted to the Local Planning Authority for approval in writing. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be permanently maintained thereafter.

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).

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.

- 5 No primary cooking shall take place within the cafe space hereby permitted, which shall be for serving cold, warmed or reheated foods only.

Reason:

In the interests of the amenity of neighbouring occupiers, 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).

- 6 Before the first occupation of the building/extension the cycle storage facilities as shown on the approved drawings shall be provided and thereafter such facilities shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport 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.

- 7 Before the first occupation of the commercial units hereby permitted, the refuse storage arrangements shown on the approved drawings shall be provided and made available for use by the occupiers of the units 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 2011 and Saved Policies 3.2 Protection of Amenity and Policy 3.7 Waste Reduction of The Southwark Plan 2007

- 8 Any deliveries, unloading and loading to the commercial units shall only be between the following hours:

9am and 4pm Monday to Friday;
10am to 4pm on Saturday; and
not at all on Sundays or Bank Holidays

Reason

To ensure that and occupiers of the development and occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity of The Southwark Plan 2007

- 9 The use hereby permitted shall only be carried out between the hours of 0800 to 2100 daily.

Reason:

To safeguard the amenities of neighbouring residential properties 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.

- 10 The facing materials used in the carrying out of this permission shall match the original facing materials in type, colour, dimensions, and in the case of brickwork, bond and coursing and pointing.

Reason

To ensure that the new works blend in with the existing building in the interest of the design and appearance 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 3.12 Quality in Design and 3.13 Urban Design of the Southwark Plan 2007

- 11 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development Order) the cafe space shall remain for A3 use and the retail units for A1 use.

Reason

To safeguard the character and the amenities of the premises and adjoining properties in accordance with Strategic Policy 13 - High environmental standards and Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity, 3.12 Quality in Design of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

Statement of positive and proactive action in dealing with the application

Additional information has been submitted to enable a recommendation for approval to be made.

Informatives

- 1 You are advised that you may require separate advertisement consent from the Council to display any advertisements on the building.
- 2 You are advised that a temporary licence will be required in order to place tables and seating on street spaces.

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OPEN		MUNICIPAL YEAR 2018-19	
COMMITTEE:	PLANNING COMMITTEE		
NOTE:	Original held in Constitutional Team; all amendments/queries to Virginia Wynn-Jones/Everton Roberts, Constitutional Team, Tel: 020 7525 7055		
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Helen Hayes MP, House of Commons, London, SW1A 0AA	1	Virginia Wynn-Jones/Everton Roberts	9
		TOTAL PRINT RUN	22

List Updated: 22 May 2018