

Planning Committee

Monday 15 June 2020
10.00 am

Online/Virtual: Members of the public are welcome to attend the meeting.
Please contact Constitutional.Team@southwark.gov.uk for a link or
telephone dial-in instructions to join the online meeting

Membership

Councillor Martin Seaton (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Barrie Hargrove
Councillor Adele Morris
Councillor Margy Newens
Councillor Damian O'Brien
Councillor Catherine Rose
Councillor Cleo Soanes

Reserves

Councillor Eleanor Kerslake
Councillor Sarah King
Councillor Richard Livingstone
Councillor James McAsh
Councillor Hamish McCallum
Councillor Darren Merrill
Councillor Jason Ochere
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.

Babysitting/Carers allowances

If you are a resident of the borough and have paid someone to look after your children, an elderly dependant or a dependant with disabilities so that you could attend this meeting, you may claim an allowance from the council. Please collect a claim form at the meeting.

Access

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

Contact: Gerald Gohler on 020 7525 7420 or email: gerald.gohler@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Eleanor Kelly

Chief Executive

Date: 29 May 2020



Planning Committee

Monday 15 June 2020

10.00 am

Online/Virtual: Members of the public are welcome to attend the meeting. Please contact Constitutional.Team@southwark.gov.uk for a link or telephone dial-in instructions to join the online meeting

Order of Business

Item No.	Title	Page No.
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.	DEVELOPMENT MANAGEMENT	3 - 6
	5.1. 227-255 ILBERTON ROAD, LONDON SE1 1NS	7 - 136
	5.2. 221 NEW KENT ROAD, LONDON SE1	137 - 212

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.”

Date: 29 May 2020

Planning Committee

Guidance on conduct of business for planning applications, enforcement cases and other planning proposals (virtual meetings)

Please note:

The council has made the following adaptations to the committee process to accommodate virtual meetings:

- The agenda will be published earlier than the statutory minimum of five working days before the meeting. We will aim to publish the agenda ten clear working days before the meeting.
- This will allow those wishing to present information at the committee to make further written submissions in advance of the meeting in order to:
 - Correct any factual information in the report
 - Confirm whether their views have been accurately reflected in the report
 - Re-emphasise the main points of their comments
 - Suggest conditions to be attached to any planning permission if granted.
- **Those wishing to speak at the meeting should notify the constitutional team at Constitutional.Team@southwark.gov.uk in advance of the meeting by 5pm on the working day preceding the meeting.**

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 in the virtual meeting and wish to speak) for **not more than three minutes each**. **Speakers must notify the constitutional team at Constitutional.Team@southwark.gov.uk in advance of the meeting by 5pm on the working day preceding the meeting.**

- (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the three-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). If there is more than one supporter (who lives within 100 metres of the development site) wishing to speak, the time is divided within the 3-minute time slot.
- (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 three-minute time allowance must be divided amongst those wishing to speak. Where you are unable to decide who is to speak in advance of the meeting, the chair will ask which objector(s)/supporter(s) would like to speak at the point the actual item is being considered. The clerk will put all objectors who agree to this in touch with each other, so that they can arrange a representative to speak on their behalf at the meeting. The clerk will put all supporters who agree to this in touch with each other, so that they can arrange a representative to speak on their behalf at the meeting.
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, will be speaking in their designated time-slots only, apart from answering brief questions for clarification; this 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 to which is open to the public and there should be no interruptions from members of the public.
10. Members of the public are welcome to record, screenshot, or tweet the public proceedings of the meeting.
11. Please be considerate towards other people and take care not to disturb the proceedings.
12. This meeting will be recorded by the council and uploaded to the Southwark Council YouTube channel the day after the meeting.

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

FOR ACCESS TO THE VIRTUAL MEETING (ONLINE/BY TELEPHONE)

PLEASE CONTACT:

Planning Committee Clerk, Constitutional Team
Finance and Governance
Tel: 020 7525 7420 or email: gerald.gohler@southwark.gov.uk

Item No. 5.	Classification: Open	Date: 15 June 2020	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 Housing, 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 planning practice guidance (PPGs) and planning policy statements (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

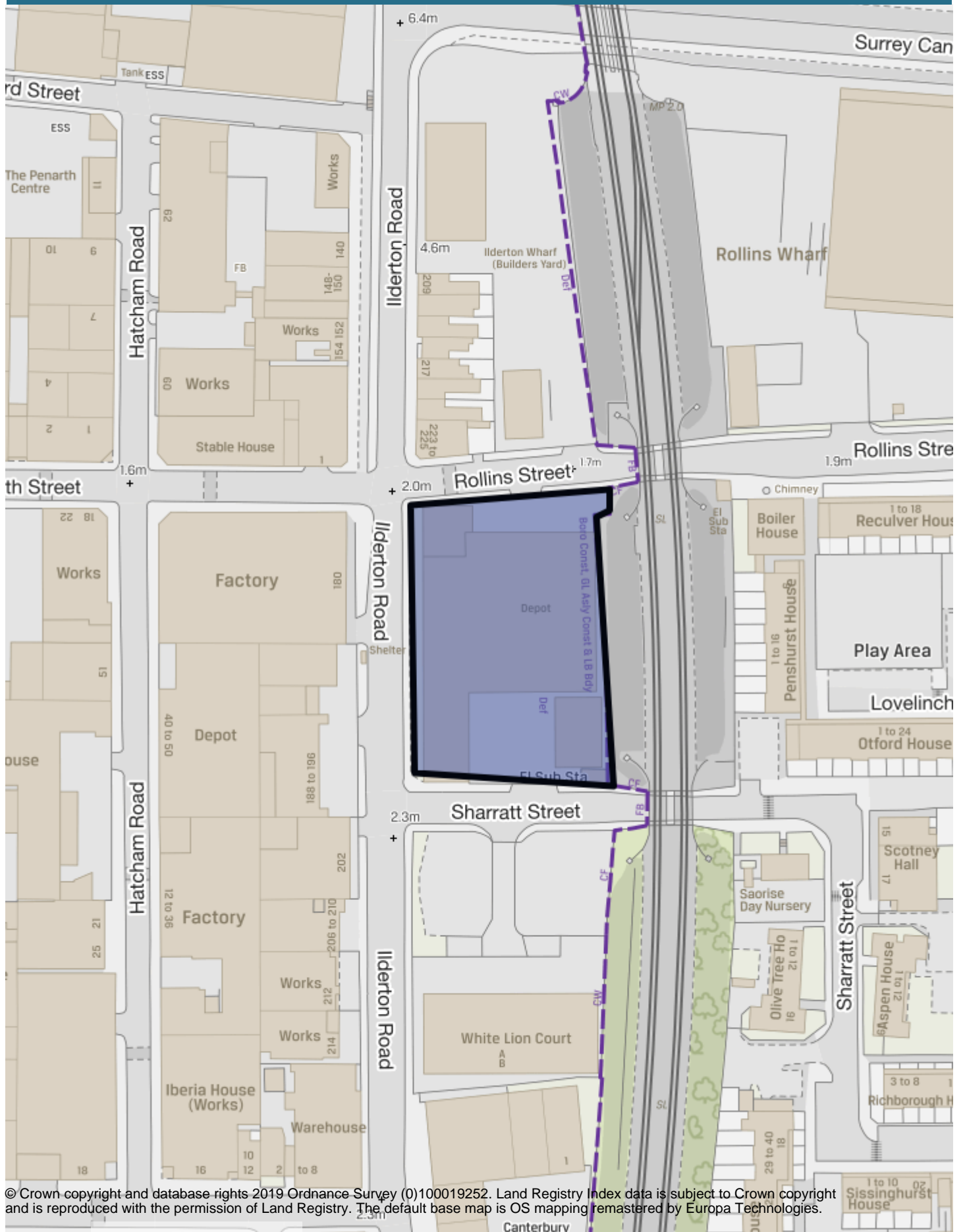
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525 5403

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services		
Report Author	Gerald Gohler, Constitutional Officer Jonathan Gorst, Head of Regeneration and Development		
Version	Final		
Dated	28 May 2020		
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		28 May 2020	



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Item No. 5.1	Classification: Open	Date: 15 June 2020	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 19/AP/1773 for: FULL PLANNING APPLICATION Address: 227-255 ILBERTON ROAD, LONDON SE15 1NS Proposal: Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising of 3,581 sqm including 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels, 598 sqm of internal loading yard, 445 sqm ancillary plant and equipment; and 254 residential apartments (C3), 35.5% affordable by habitable room, and other associated infrastructure. This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning		
Application Start Date 24/05/2019		Application Expiry Date 23/08/2019	
Earliest Decision Date 31/08/2019			

RECOMMENDATIONS

1. That planning permission be granted, subject to conditions and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than the 15 December 2020.
2. That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
3. That following issue of the decision it be confirmed that the director of planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1) (d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.
4. In the event that the requirements of (1) are not met by 15 December 2020 that the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 277 of this report.

EXECUTIVE SUMMARY

Site at 227-255 Ilderton Road:



The major redevelopment of the site is supported and delivers many of the key aspirations of the AAP. The mix of uses achieved is considered to be exemplary, successfully combining industrial and residential uses in a carefully considered design led approach. The scheme would make a significant contribution to the councils housing and jobs targets in one of the boroughs major regeneration areas.

Existing land use (Paragraphs 6 and 12)

- Use Class B8 – industrial food storage and distribution warehouse with ancillary B1 office space, owned and occupied by Leathams Limited, a family owned business and independent provider of high-quality ingredients to the food industry.
- Total floorspace of 2,972 sqm (GIA) – comprising 2,005 sqm of storage and distribution space and 967 sqm of ancillary office space

Proposed Development (Paragraphs 13 - 24)

Industrial

3,581 sqm (GIA) of flexible industrial floorspace, comprising:

- 2,184 sqm of B8/B1c industrial floorspace;
- 354 sqm of B1c affordable workspace (10%);
- 598 sqm internal loading yard ancillary B8/B1c
- 445 sqm ancillary plant and equipment space for B8/B1c use
- Total B8 and B1c is 3581sqm

Residential

254 new homes, comprising:

- 12 x studio (5%);
- 89 x 1-bedroom (35%);
- 102 x 2-bedrooms (40%); and
- 51 x 3-bedrooms (20%).

Affordable

35.5% affordable homes (by habitable room), comprising;

- 27.8% Southwark Social Rent; and
- 7.7% Intermediate.

Accessibility

All flats are accessible, comprising:

- All units are Building Regulations Part M4(2) compliant; and
- 26 units (10%) are Building Regulations Part M4(3) accessible.

Amenity

All private and communal space is met on site. All under 12 children's play space met on site, comprising:

- 2,087 sqm of private amenity space in the form of balconies and winter gardens;
- 503 sqm of communal space, 76 sqm communal room (for older children's play)
- 909 sqm of children's play space;
- 144 sqm public open space
- A financial contribution would be made to off site play and public open space provision

Aspect

- 70% homes are dual aspect ;
- 92% of affordable housing units are dual aspect; and
- 60% of the private units are dual aspect .

Heights

Buildings of up to 28 storeys in height, comprising:

- A tower of 25-storeys set above a 2/3 storey commercial podium (28-storeys above ground) – a total of 94.65m AOD; and
- A 'u-shaped' building of 6-storeys set above a 2/3 storey commercial podium (9-storeys above ground) – a total of 30.24m AOD.

Parking

Commercial:

- Two disabled parking spaces for employees; and
- 10 long stay and 3 short stay cycle parking spaces.

Residential:

- Car free with potential for up to 7 disabled parking bays; and
- 453 cycle parking spaces and 6 visitor cycle parking spaces.

Environment

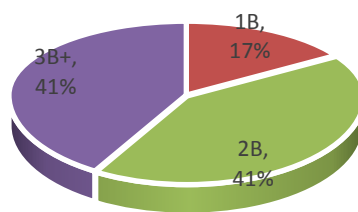
- Net gain in biodiversity;
- Greenfield runoff rates; and
- Will achieve 18% CO2 savings over the building regulations baseline and will achieve net carbon zero following a contribution of £475,991 to the carbon offset fund.

Community Infrastructure Levy

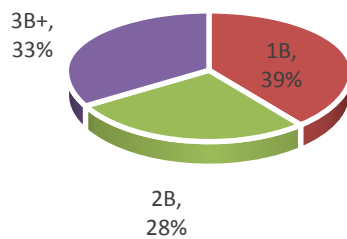
- Estimated CIL of *circa* £6,807,494.74 before relief and indexation.

Image: Section through of ground floor uses and dual aspect affordable units



Image: Podium courtyard space for amenity and play space**Affordable Housing (Paragraphs 59-67):****Unit Mix – Social Rent**

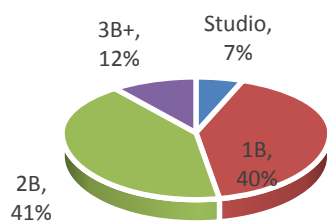
Unit Size No.	Studio	1-bed	2-bed	3-bed	Total
	0	10	24	24	58

Unit Mix – Intermediate

Unit Size No.	Studio	1-bed	2-bed	3-bed	Total
	0	7	5	6	18

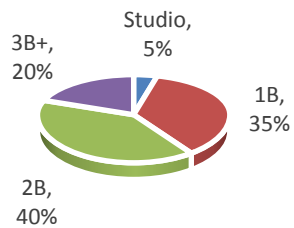
Unit Mix – Private

Unit Size	Studio	1-bed	2-bed	3-bed	Total
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No.	12	72	73	21	178
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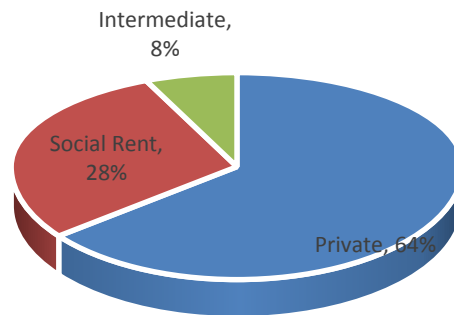
Unit Mix – Total



Unit Size	Studio	1 bed	2 bed	3 bed	Total
No	12	89	102	51	254

Habitable Rooms by Tenure and Tenure mix:

Tenure	Habitable Rooms
	No.
Private	492
Social Rent	212
Intermediate	59
Total	763



Unit Location and Totals:

Location	Private	Social Rent	Intermediate	Total	Wheelchair
Core A	178	0	18	196	20
Core B	0	58	0	58	6
Total	178	58	18	254	26

Residential Design – Dual Aspect (Paragraph 149):

By Tenure

	Affordable	Private	Total
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Total (No.)	70/76	107/178	177/254
%	92%	60%	70%

By Core

	Core A	Core B	Total
Total (No.)	119/196	58/58	177/254
%	61%	100%	70%

Amenity Space and Public Open Space(Paragraphs 102-103 & 156-177):

Private, Communal and Play

	Requirement	Proposed	Difference
Private Amenity Space	2,540 sqm	2,087 sqm	-453 sqm provided as communal space
Communal Amenity Space	50 sqm plus 453 sqm = 503sqm	503 sqm	0
Children's Play Space	1,115 sqm	909 sqm	-206 sqm
Public Open Space	None required in the AAP masterplan for this site, however a payment base on 5sqm of public open space per flat is required.	144 sqm	-1,126





- Older children's play (12+ years) is to be provided in part by way of a financial contribution, equivalent to £31,106 (206 sqm x £151), to be spent on new and existing public open spaces including Bramcote Park.

Public Open Space

The building is set back from the site boundaries thereby facilitating an open space provision of 144 sqm on the corner of Rollins Street and Ilderton Road.

The outstanding public open space requirement is to be provided by way of a financial contribution, of £230,830 to be spent on new and existing public open spaces in the AAP including Bramcote Park.



Sustainability:

Energy (Paragraphs 258-267)

- Alongside energy efficiency measures to improve the building fabric and services, the proposed development would include an Air Source Heat Pump for the industrial uses and Photovoltaic Panels for the residential;
- Residential areas would achieve a 18% carbon reduction beyond building regulations baseline and non-residential areas would achieve a 21%

- reduction;
- A carbon offset payment of £475,991 (comprising £443,411 for the residential areas and £32,580 for the non-residential) is proposed to achieve net zero carbon; and
 - The proposed development has been designed so that it can be connected to the SELCHP District wide heating network that is currently being developed by the GLA and Veolia. This future connection would reduce CO2 emissions for the residential areas by 76%. The non-residential areas could also be connected.

Car and Cycle Parking (Paragraphs 219-220 & 224-225)

- As well as operational parking for the end user, the commercial element would also include two disabled parking spaces for employees and 10 long stay / 3 short stay cycle parking spaces.
- The residential element will be “car free”, however, space has been safeguarded for up to 7 disabled parking bays on Ilderton Road, Sharratt Street and Rollins Street through the conversion of some of the proposed servicing areas should a parking space be required by a blue badge holder in the future.
- 453 cycle parking spaces are proposed (comprising 200 Sheffield stands, 26 oversized Sheffield stands, 142 stackers and 85 lockers for folding bikes) as well as 6 visitor cycle parking spaces.

Proposed development viewed from surrounding area





BACKGROUND INFORMATION

Site location and description

5. The subject site is a parcel of land located on the eastern side of Ilderton Road comprising of circa 0.43 hectares. It comprises a two storey warehouse with an ancillary office building located to the eastern end of Ilderton Road at its junctions with Rollins Street and Sharratt Street.
6. Leathams Ltd, is a family owned business and independent provider of high-quality ingredients to the food industry. It has been trading since 1980, sourcing products globally and distributing both nationally and internationally. Its current headquarters and distribution centre have been located at 227-255 Ilderton Road since 1995 and have been added to incrementally as the business has grown. Due to the growth of the business, the current on-site facilities can no longer meet operational requirements.
7. The site is located on the eastern side of Ilderton Road between the junctions with Rollins Street to the north, and Sharratt Street to the south. The rear of the site is abutted by the railway line between the stations of South Bermondsey and Queens Road Peckham. The location of the railway line is also the administrative boundary between Southwark and Lewisham Councils. Beyond the railway line is a block of flats within the Lewisham borders, which comprises of a series of four storey brick buildings arranged around shared communal yards called the Winslade Estate.
8. To the west of the site is 180 Ilderton Road which received planning permission for the demolition of existing building and erection of a part 5, 8 and 9 storey plus basement mixed-use development under planning permission 17/AP/4546. This site has been cleared pending the start of construction. To the north of the site is the Jewson Yard (Ilderton Wharf) which is fronted by a row of terraced properties (two storeys towards the western end of the terrace, and three storeys at the eastern end). The two storey properties consisting of nos. 215-225 Ilderton Road are not in residential use; however, the three storey buildings at the eastern end of the terrace are in residential use. This terrace is one of the few remaining terraces within Ilderton Road, and is a typology that once dominated the streetscene of Ilderton Road. The site location plan below demonstrates the site within the surrounding context.

Image: Site Plan



9. The site has a (PTAL) rating of 2. The closest Bus Stop to the application site is Manor Grove, which is located circa 65 metres south of the subject site. The Bus Stop is served by Transport for London Bus Route P12. South Bermondsey Station is located approximately 0.5 miles north of the application site as is Quiet Way 1.
10. The location of the site along Ilderton Road is likely to result in an increase of the PTAL rating given that the proposed Bakerloo Line Extension (BLE), and New Bermondsey Station would provide further transport options to the site and surrounding area.
11. The application site is within the boundaries of sub-section OKR 16 of the Old Kent Road Opportunity Area. This sub-section is known as '*Hatcham Road and Ilderton Road*'. The OKR 16 allocation has a total site area of 7.9 hectares with an indicative capacity for the creation of 1,460 new homes and 1,170 new jobs. It is the intention of this allocation to replace existing employment floor space in Use Class B8 and B1c whilst also providing residential and mixed use schemes along with on-site servicing.
12. The table below demonstrates the existing area schedule on the application site.

Table: Existing Area Schedule

			Total
Occupier	Leathams	Leathams	
Use Class	B8	B1	
Sqm (GIA)	2,005	967	2,972

Details of proposal

13. Planning permission is sought for the demolition of the existing buildings on site to facilitate the construction of a mixed-use scheme comprising of 2,538 sqm of industrial floor space (Use Classes B1c and B8) at ground and intermediate levels, an ancillary internal loading yard of 598 sqm and 445 sqm of ancillary plant space; 254 residential apartment (Use class C3) in two blocks ranging from 6 to 25 storeys above a 2/3 storey podium (9 and 28 storeys above ground); and other associated infrastructure.
14. The development comprises a total industrial Gross Internal Area (GIA) of 3,581 sqm (including loading yard and plant). The ground floor would facilitate the industrial aspects of the scheme with the B1c Affordable unit located to the northwest corner, and the B1c/B8 floor space using up the majority of the ground floor, adjacent to the loading yard which is accommodated at the rear of the site. The northern and southern edges of the ground floor provide lift and stair access next to cycle and refuse storage.
15. At intermediate level there is provision for plant equipment in relation to the B1c and B8 Uses, with additional floor space provided for the B1c Affordable work space. To the northeast corner of the intermediate level are four residential flats, including one flat that is Wheelchair Accessible.
16. Floor two and above facilitates the residential element of the development, providing 254 units. 26 of the 254 units will be wheelchair accessible and adaptable units. The residential aspect is spread over two areas of the site, one consisting of the '*southern block*', and the '*tower block*'. The breakdown of the proposed land uses is detailed in the table below:

Table: Proposed land uses

Land Use	Use Class	GIA
Residential	C3	23,458.50 sqm
Industrial	B8	2,184 sqm 598 sqm Internal service yard 445 sqm plant and equipment
Work space	B1c	354 sqm

17. The proposal would facilitate the provision of 35% affordable housing units within the scheme comprising 72% Social Rent at no more than HCA rent cap levels inclusive of service charge and 28% for Shared Ownership. Whilst studio units are proposed, this does not form part of the social and intermediate units.
18. The development will be car free; however, space has been safeguarded for the installation of disabled parking bays on Ilderton Road, Sharratt Street and Rollins

Street should a parking space be required by a blue badge holder. In addition to this, two disabled spaces are facilitated within the loading yard for industrial employees.

19. Cycle parking provision is in line with the standards required within the emerging London Plan. The mix of cycle parking will be in the form of 50% Sheffield stands, 31% cycle stackers, and 19% foldable bike lockers. For residential occupiers, the cycle stores are to be located at ground and intermediate level, with the intermediate level accessed via entrance cores and lifts suitable to accommodate cycles. For Industrial employees, the cycle parking is also located at intermediate level and is accessible from Sharratt Street via a lift. The overall provision is detailed below:

- Residential: 453 long-stay spaces and 6 short-stay
- Industrial = 10 long-stay and 3 short-stay

20. The following table demonstrates the housing mix that is proposed for the development.

Table: Housing mix

Unit size	No. of homes	% of homes
Studio	12	4.72%
1 bed	89	35.04%
2 bed	102	40.16%
3 bed	51	20.08%
Total	254	100%

21. The majority of amenity and play space proposed within the development is located on the second floor courtyard podium. This area is situated between the '*southern block*', and the '*tower block*' and provides 1,083 sqm of play and communal amenity space. An additional play terrace is centrally located on the seventh floor of the '*southern block*' of 115 sqm with a further terrace on the seventh floor of the '*tower block*' providing 224 sqm of communal amenity and a 76sqm communal room. The total provision of accessible community amenity and play space is 1,422 sqm.
22. Improvements to the public realm would include the removal of the existing advertisement hoardings which currently run parallel with Ilderton Road. This enables the footpath width to be extended from its current 1.80 metres, to 5.00 metres. The improvements would allow for new landscaping and planting to be inserted around the site whilst also enhancing the pedestrian environment. Furthermore, an additional area of public open space will also be created adjacent to the main residential tower entrance on Rollins Street.

Revisions and amendments

23. Whilst no design or alterations to the total number of residential units has occurred during the lifespan of this application, additional information regarding some areas

of assessment was submitted. The documents were submitted in light of comments received from consultee comments. In acknowledging the further documents, the nature of the information received re-consultation of the scheme was not required.

24. The documents of additional information submitted during the course of this application were as follows:

- Drainage addendum
- Sustainable Energy Strategy Revision 2
- GLA Domestic Overheating Checklist
- Summer Overheating Assessment In Dwellings
- Transport Assessment Addendum

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- The principle of the proposed development in terms of land use and the release of the site from its industrial designation;
- Affordable housing;
- Design, layout, heritage assets and tall buildings including views;
- Public realm, landscaping and trees;
- Housing mix including wheelchair housing;
- Quality of accommodation;
- Density;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport;
- Noise and vibration;
- Sustainable development implications;
- Ecology;
- Air quality;
- Wind microclimate;
- Equalities and human rights;
- Statement of community involvement.

Legal context

26. 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 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007.
27. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections in the overall assessment at the end of the report.

Equalities

28. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. 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 this 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; and
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
29. As set out in the Essential Guide to the Public Sector Equality Duty (2014), “the duty is on the decision maker personally in terms of what he or she knew and took into account. A decision maker cannot be assumed to know what was in the minds of his or her officials giving advice on the decision”. A public authority must have sufficient evidence in which to base consideration of the impact of a decision.
30. The closest Travellers site to the proposed development is located close to the junction with Rotherhithe New Road and Ilderton Road. The distance between the Travellers site and the subject site is circa 490 metres to north. Given the separation distance it is considered that there would be no adverse impacts on the traveller’s site. There are no other groups with protected characteristics that would be adversely affected by the development.

Other Equality Impacts

31. The Strategic Housing Market Assessment (SHMA) prepared on behalf of a number of South East London boroughs states that Southwark, together with Lewisham, has the most ethnically mixed population in the South East London sub-region. Compared to the population at large a very high proportion of Black households (70%) are housed in the social/affordable rented sector. These groups could therefore stand to benefit from the proposed affordable housing, which would include social rented units. The provision of communal amenity spaces to be shared by different tenures would also contribute to the potential for increased social cohesion. This is a positive aspect of the scheme.
32. Proposed enhancements to the streetscape (Including the widening of the footpath) on Ilderton Road would prioritise the movement of pedestrians and promote “healthier, active lives” in accordance with draft Policy AAP 10 of the draft OKR AAP.
33. The proposed development would also generate additional opportunities for local employment. The proposed development would deliver 2,184 sqm (GIA) of B8/B1c Use Class floor space on the ground and intermediate floors representing an uplift of 179 sqm. An additional 1,043 sqm of ancillary loading yard and plant and equipment space is also provided. Furthermore, 354 sqm of B1c Affordable Work

Space is facilitated which is currently not present on site therefore resulting in an uplift of 354 sqm of B1c Use.

Conclusion on Equality Impacts

34. The proposed development would not result in any adverse equality impacts in relation to the protected characteristics of religion or belief and race as a result of the re-provision and uplift of B8 Use on site along with the introduction of B1c and C3 Residential Uses. Notwithstanding that the development would result in a significant change to the site, Officers are satisfied that equality implications have been carefully considered throughout 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 Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.
35. 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 Section 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 focusing 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.

Principle of development in terms of land use

36. The NPPF (2019) offers a number of key principles that emphasise a focus on driving and supporting sustainable economic development to facilitate the delivery of new homes and commercial business units etc. The application site is located within the Old Kent Road Opportunity Area. In locations such as this, both London Plan and Southwark Plan policies strive for higher density, high quality mixed use developments which assist in addressing the need for new homes and ranges of employment opportunities.
37. In the draft OKR AAP, the site is identified as falling within Proposal Site OKR16. The draft site allocation states that redevelopment on this site must:
 - Replace existing employment space (B Use Class) and provide a range of employment spaces which is consistent with the building and land use types such as B8
 - The east side of Ilderton Road is suitable for industrial uses within mixed use developments that provides new homes
 - Provide on site servicing.
 - Improvement the surrounding environment and public realm to the benefit of walking and cycling
38. The existing Leathams Ltd Use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would provide an uplift of B8 Industrial space, the introduction of B1c Affordable Workspace, and the facilitation of 254 units on the upper floors of the buildings would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

Image: OKR Sub Area 4, showing Site Allocation OKR 16 outlined in red.

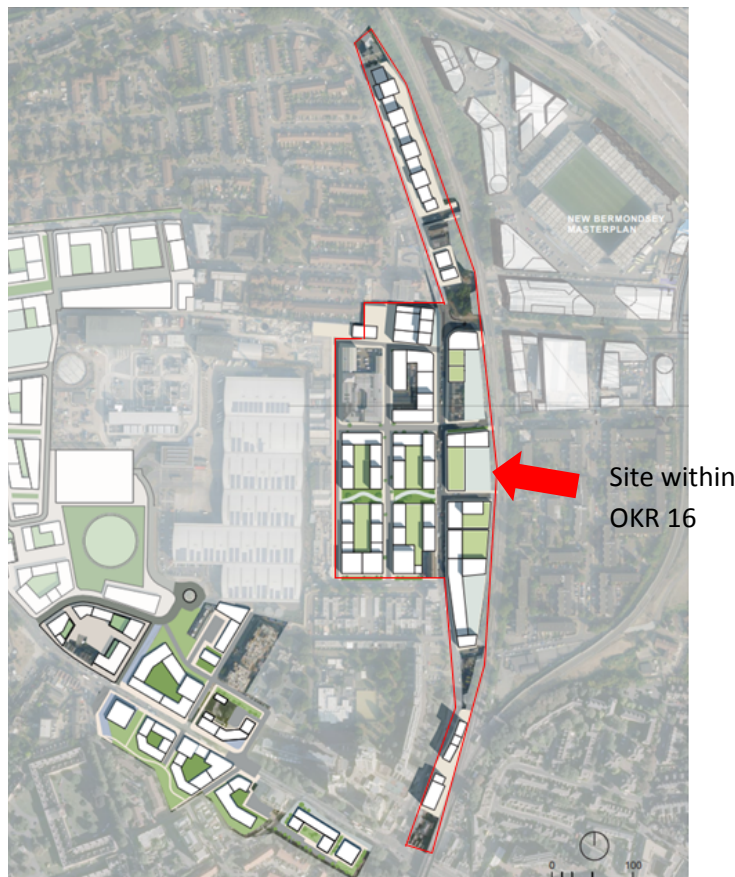


Image: Subject site within the OKR area.



Industrial Land

39. The entire site is located within Strategic Industrial Land (SIL), as identified in the Core Strategy (2011) and London Plan (2017). Strategic Policy 10 of the Core

Strategy states that SIL will be protected for industrial and warehousing uses. Saved Southwark Plan Policy 1.2 states that the only land uses that will be permitted in SIL are B class uses and other sui generis uses which would be inappropriate in residential areas. This proposal represents a departure from these policies by proposing residential use within SIL.

The Core Strategy does however also recognise that structural changes in the economy are resulting in a declining need for industrial land in London and that diversifying the range of job opportunities in industrial locations can be of benefit to local people. Furthermore, it also sets out the future direction of the Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP).

40. Adopted London Plan (2017) Policy 2.17 seeks to promote, manage and where appropriate, protect SIL as London's main reservoir of industrial and related capacity, which includes general and light industrial uses. It states that developments on SIL should be refused unless they:
 - Provide for broad industrial type activities;
 - Are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework;
 - Meet the needs of small to medium sized enterprises
41. The adopted London Plan (2017) also designates the Old Kent Road as an Opportunity Area, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. This capacity has been increased to a minimum of 12,000 new homes in the emerging new London Plan. Both adopted and new London Plan identify the potential for residential-led development along the Old Kent Road corridor, with homes and jobs targets to be explored and further refined through the preparation of a planning framework and a review of the Old Kent Road SIL.
42. Furthermore, the draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. It proposes the release of a substantial part of the Strategic and local Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods where new and existing businesses would co-exist with new homes.
43. Paragraph 48 of the NPPF (2019) states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The New Southwark Plan and draft OKR AAP have been subject to extensive consultation however they have yet to be subject to independent examination and therefore the documents have limited weight. They do, however, provide an indication of the direction of travel for planning policy in the opportunity area.
44. Taking into account the adopted policy position, when determining whether the principle of the proposed development would be acceptable in land use terms, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused by the loss of SIL and the introduction of a residential use into SIL, and whether those benefits would justify a departure from adopted planning policy.

Employment Re-provision (No Net Loss)

45. The current headquarters and distribution centre for Leathams has been located at the subject site since 1995 with the business growing incrementally in the years since. Draft London Plan Policy E4 ('Land for Industry, Logistics and Services to Support London's Economic Function') requires Southwark to retain industrial capacity, according to a general principle of "no net loss". It should be noted that the Secretary of State recently directed the Mayor to delete some policies from his plan including the no net loss provision.
46. The existing provision of B8 floor space on the site comprises 2,005 sqm with 967 sqm of ancillary B1 Office Use (2972 sqm in total). The proposed would provide 2,184 sqm of B8 floor space on the ground and intermediate floor levels with an additional 1,043 sqm of Ancillary B8 floor space comprising the internal Loading Yard (598 sqm), and associated plant space(445 sqm). This would total 3,227 sqm of B8 space an increase of 255 sqm. In addition 354sqm of affordable B1c space would also be provided, providing 3581 sqm of B8 and B1c space in total an increase of 609 sqm.
47. The site currently provides 967 sqm of Ancillary B1 Office space. This would not be replaced, and had been introduced over time as the business grew. This is considered acceptable as B8 and B1c uses are being prioritised in this part of the AAP. In addition the form of the building is inherently flexible so should the need to provide office space arise it could be accommodated within the built form.
48. The proposals would result in an uplift of industrial floor space, the removal of some office floor space, and the creation of affordable workspace in line with the requirements of the emerging New Southwark Plan and AAP. In addition, the ancillary loading yard space is anticipated to provide good provision for operational requirements for businesses using the B8 floor space as per the requirements of the draft AAP and emerging London Plan Policy E4.
49. An additional benefit of the development is that the proposed industrial floor space has been carefully thought-out compared to the existing provision on site which is ad hoc. The floor to ceiling heights within the B8 space is 7.00 metres. Furthermore, a minimal number of columns are proposed, as well as two floors of B1c workspace (3.50 metre floor to ceiling heights) running parallel with Ilderton Road. This space can be used to provide ancillary space associated with a single large tenant; or could be divided up to create space for a number of distinct small industrial companies. The flexibility of the industrial floor space in order to accommodate a variety of potential occupiers is an exemplary part of this scheme.

Image: Ground floor layout demonstrating the areas of B1c and B8 floor space

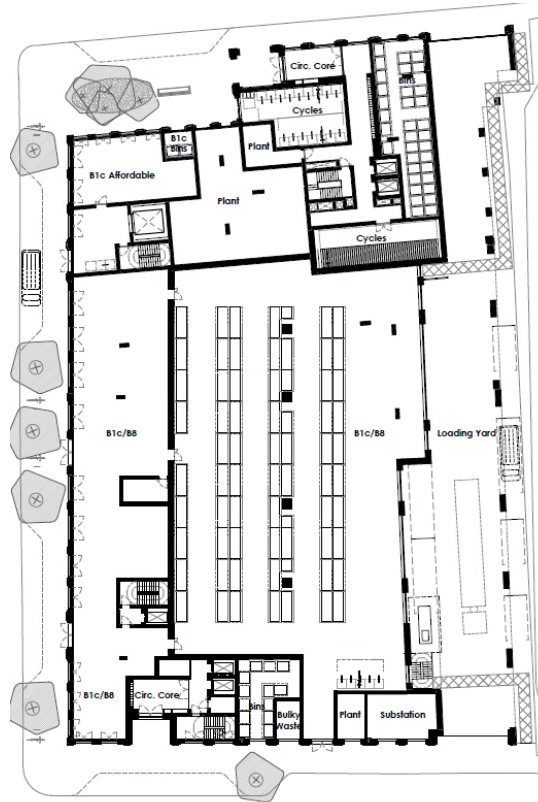


Image: Intermediate floor layout demonstrating the areas of B1c and B8 floorspace

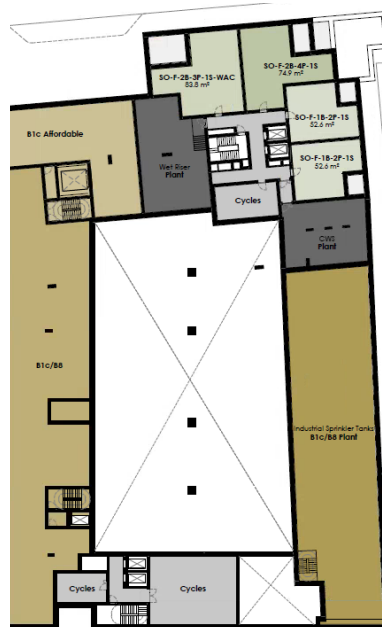


Image: Floor to ceiling heights of B1c (3.50 metres over two floors) and B8 (7 metres)



Job Creation

50. Leatham's currently employs 145 staff with approximately 50% of the overall number in Office and Administrative roles as opposed to pure industrial employment. Based on the HCA's Employment Density Guide 3rd Edition (November 2015), the proposed industrial space would generate approximately 76 jobs. Whilst this is a reduction in overall employment, the 76 jobs provided is the equivalent of the current industrial jobs within Leatham's business. Furthermore, the actual number of jobs that would be created will depend on the end operator or operators, which could end up higher than the 76 estimated. It is also worth noting that the requirement for uplift in jobs is to be achieved across the Opportunity Area as a whole, not necessarily on specific sites such as the subject site.
51. The Local Economy Team (LET) within Southwark supports the application given that it matches the economic, job, and growth plans for the Borough. The development provides uplift in employment space, and is expected to deliver 45 sustained jobs to unemployed Southwark residents, 45 short courses, and take on 11 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution. In addition to this, the provision of 10% of the employment floor space for Affordable Workspace is welcomed by LET.
52. All LET recommendations would be secured through the Section 106 agreement. If any of these expectations were not to be achieved, financial contributions would be sought in accordance with the council's Planning Obligations and CIL SPD. An Employment, Skills and Business Support Plan would also be secured through the Section 106 Agreement.

Assessment of main town centre uses

53. The site is not currently within a designated Town Centre, and as the development does not propose the introduction of A Class Units an assessment of Town Centre Uses is not required to be assessed as part of this report.

Provision of housing, including affordable housing

54. The scheme would deliver 254 new homes, including policy compliant affordable housing 35.5% by habitable rooms. This is a significant positive aspect of the scheme. There is a pressing need for housing in the borough. Policy 3.3 of the London Plan supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. This is reinforced through

Strategic Policy 5 of the Core Strategy and emerging policy in the draft new London Plan, NSP and draft OKR AAP.

Prematurity

55. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance:

“arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
56. Refusal of planning permission on grounds of prematurity would seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.”
57. The most up to date adopted development plan document pertinent to the Old Kent Road is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing led growth. The draft OKR AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the draft New London Plan aspirations for industrial land and employment are addressed. The scheme under consideration here is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London Plan and the direction of travel of the draft NSP and the 2016 and 2017 draft OKR AAPs and the 2018 draft New London Plan (including changes proposed by the Secretary of State in 2020. It is not therefore considered to be premature.

Conclusion on Land Use

58. The scheme would deliver major regeneration benefits, including a significant contribution to the borough’s housing stock, a policy compliant level of affordable housing, job creation, high quality industrial and affordable workspace. In light of the above, it is considered that the development, in land use terms, is acceptable, and its contribution to Ilderton Road and surrounding area should be supported.

Affordable housing and development viability

Affordable Housing

59. In summary, the proposed scheme would deliver 76 affordable homes to the borough's housing stock. When calculated as habitable rooms, this represents a policy compliant 35.5% affordable housing offer. In line with draft New Southwark Plan Policy P1, 27.8% of the all proposed habitable rooms would be for social rent (at least 25% is required by policy), and 7.7% would be intermediate.
60. Southwark Plan Saved Policy 4.4 requires at least 35% of all new housing to be provided as affordable housing. Of that 35%, there is a requirement for 50% social housing and 50% intermediate housing in the Old Kent Road Action Area. The adopted London Plan (2017) sets a strategic requirement of 60% social housing and 40% intermediate housing. Emerging New Southwark Plan Policy P1 sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% as intermediate housing.
61. The requirement for social housing set out in the New Southwark Plan is higher than the London Plan and the saved Southwark Plan policy given the acute need for social housing in Southwark. Approximately 57% of the borough's total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute affordable housing need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions. Overcrowding is strongly related to poor physical and mental health and can strain family relationships. Children in overcrowded homes often achieve poorly at school and suffer disturbed sleep. Social rented housing is vital to social regeneration as it allows residents who cannot afford suitable market housing to remain close to their families, friends and employment. For this reason draft Policy P1 of the New Southwark Plan requires a minimum 25% of homes to be provided as social rented housing, which the proposed development complies with.
62. In accordance with the council's Affordable Housing SPD, rooms that are over 28 sqm have been counted twice for the purposes of calculating affordable housing. This accounts for large open plan living room spaces that include kitchens and dining areas.
63. In total, 763 habitable rooms would be provided. 271 of these would be affordable habitable rooms, which would equate to an overall provision of 35.5% and is therefore fully policy compliant and a very positive aspect of the scheme. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
64. With regard to tenure split, out of the total 763 habitable rooms, 212 would be social rented (27.8%), 59 would be intermediate (7.7%). This exceeds the requirement for 25% of homes to be social rented.

Table: Tenure Split

Tenure	Habitable Rooms		Units	
	No.	%	No.	%
Private	492	64.48%	178	70.08%

Social rented	212	27.8%	58	22.83%
Intermediate	59	7.7%	18	7.09%
Total	763		254	

65. All 58 social rented homes would be delivered in the '*southern block*', with the 18 intermediate homes to be located in the '*tower block*' along with all 178 private homes. The Section 106 Legal Agreement would secure the delivery of these units.
66. As with all Old Kent Road schemes, service charge costs to social rent tenants would be capped within social rent cap levels. This would be required in the Section 106 and confirmed when a registered social landlord is on board.
67. A contribution of £10,058.60 (a charge of £132.35 per affordable home) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the legal agreement.

Development viability

68. Southwark's Development Viability SPD requires a Financial Viability Appraisal (FVA) to be submitted for all planning applications which trigger a requirement to provide affordable housing. The FVA should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements.
69. This application is therefore accompanied by a FVA, which was reviewed by independent consultants on behalf of the council. The findings from the Independent consultant's report indicate that the scheme would generate a deficit when benchmarked against the site value. The sensitivity analysis has determined that if the sales value grew, and construction costs rise, the scheme would be able to deliver a surplus when benchmarked against the site value. In concluding their report, the assessment of the proposed development demonstrates that the scheme cannot currently viably deliver the prescribed amount of affordable housing. As the subject site is located near to the proposed Bakerloo Line, and close to the location of the New Bermondsey Station, the development would benefit from the wider regeneration of the area. This would boost sales and thus the scheme would be likely to directly benefit from increases in residential pricing in the longer term. Therefore it is considered that the applicant's proposal of 35.5% affordable housing contribution by habitable rooms is reasonable.

Conclusion on Affordable Housing

70. In conclusion, the level of affordable housing proposed at 35.5% is a very positive aspect of the proposals. The offer is therefore considered deliverable on this basis and terms to secure the affordable housing would be included in the legal agreement, together with an early stage viability review should the scheme not be implemented within two years.

Design considerations

71. Strategic Policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to “achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.” Saved Policy 3.12 ‘Quality in design’ of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. Saved Policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. With specific reference to tall buildings, Policy 7.7 of the London Plan (2016), ‘Location and Design of Tall and Large Buildings’ and Saved Policy 3.20 of the Southwark Plan sets out design requirements for tall buildings, both of which are discussed in further detail in the following paragraphs.
72. The emerging design policy in the New Southwark Plan includes P12, Design Quality and P14 Tall Buildings. P12 states that development must provide, amongst other things, high standards of design with appropriate fabric, function and composition. P14 sets out locational and design requirements for tall buildings (defined as significantly taller than surrounding buildings or their context). It states that the highest tall buildings will be located in areas where there is the greatest opportunity for regeneration, including Opportunity Areas, such as The Old Kent Road Opportunity Area.

Site layout

73. The proposed layout of the site would comprise of one urban block with two distinct buildings rising above the podium, one on the northern and one on the southern side of the site. The building rising at the northern corner of the site is known on as the ‘*tower block*’. The tower block is 28 storeys and 94.65m in height. The building at the southern end of the site is known as the ‘*southern block*’. This building is 9 storeys in height. The podium space is located centrally between the two residential buildings. The ground and intermediate levels provide the workspace for B1c and B8 Uses within the site. To the rear of the site is the Loading Yard which is accessed from both Rollins Street and Sharratt Street.
74. The central podium space will provide 1,083 sqm of amenity space, 289 sqm as communal space and 794 sqm of play space for all age groups. An additional play terrace is centrally located on the seventh floor of the ‘*southern block*’ of 115 sqm with a further terrace on the seventh floor of the ‘*tower block*’ providing 224 sqm of communal space and a 76 sqm communal room, which could be used for older children’s play. The total provision of communal amenity space in the scheme is 503 sqm and this meets design guidance requirements. The on site play space is 909 sqm in total, and whilst this meets provision for under 5’s to 12 year olds there is a shortfall in space for the over 12’s.
75. The existing public realm would be significantly improved as part of the development. Improvements include the removal of the existing advertisement hoardings which currently run parallel with Ilderton Road. This allows for the

footpath width to be extended to 5.00 metres allowing for increased movement and comfort for pedestrians entering, leaving, or walking past the site. The improvements would also facilitate new landscaping and planting to be inserted around the site. Furthermore, an additional area of public open space will also be created adjacent to the main residential tower entrance on Rollins Street. The improvements would create active frontages onto Ilderton Road, Rollins Street and Sharratt Street.

Image: Site layout

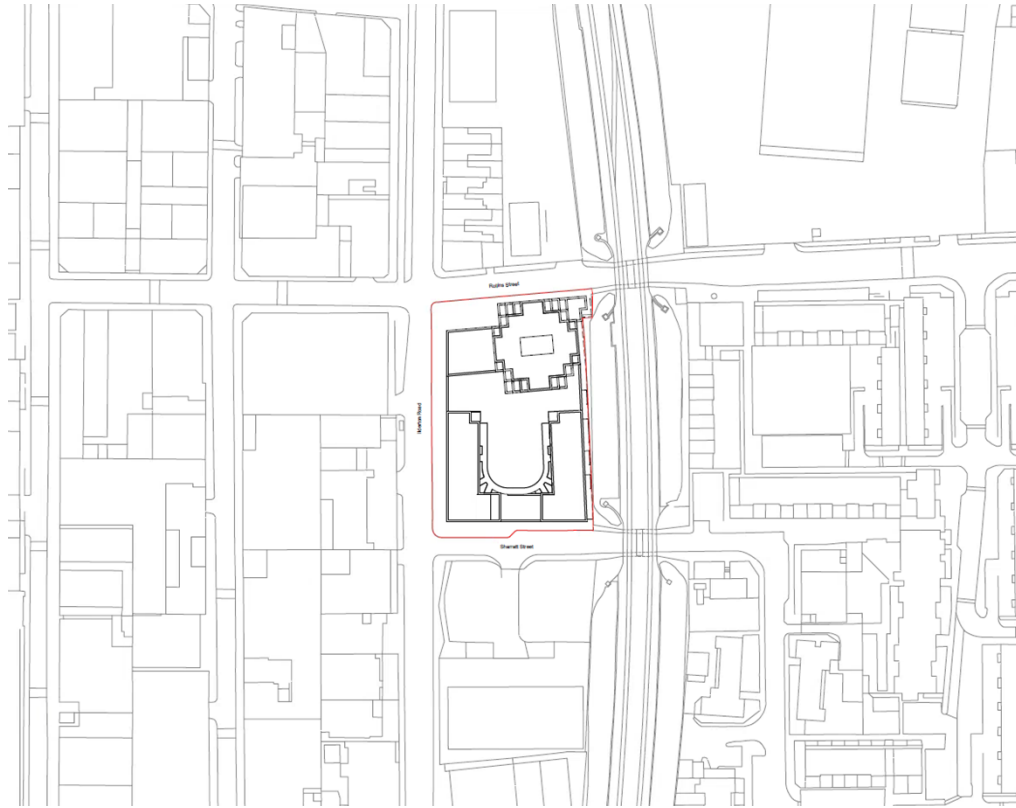


Image: Frontage onto Ilderton Road

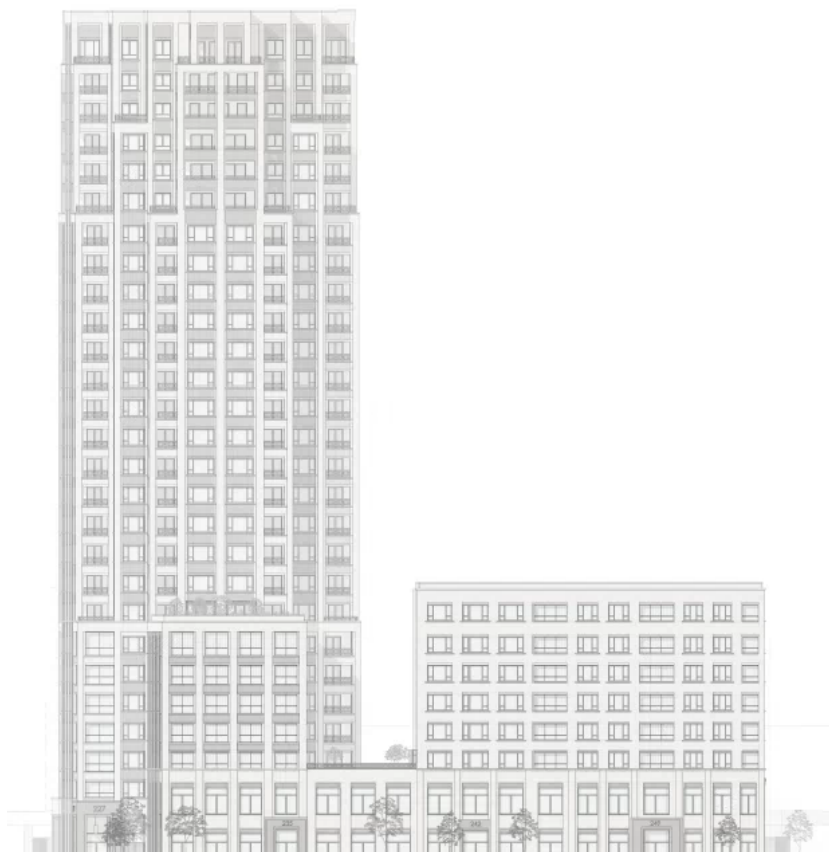


76. The active frontages take the form of entrances to the proposed residential and B1c/floorspace on the ground floor. The Sharratt and Rollins Street elevations, have residential entrances to each respective residential towers. The entrances to the commercial uses are evenly distributed along Ilderton Road and this ensures the

activeness of the frontages. The introduction of landscaping and planting to each elevation provides a variety of street character with appropriate levels of activity on each edge of the subject site.

Height scale and massing (including consideration of tall buildings)

Image: The development, viewed from Ilderton Road



77. This mixed use development forms a single urban block composed of a variety of strata; an industrial part 2 part 3 storey podium stretches across the majority of the urban site with three extruded blocks forming the upper residential units. A U-shaped block is positioned to the south of the site comprised of 6 residential storeys (9 storeys above ground at a height of +30.24m AOD) encompassing the courtyard. The centre of the block on the southern edge at Sharratt Street has been recessed by a storey to allow for a reduction in massing and increase sunlight exposure to the internal courtyard. A vertical tower is located to the north east of the site reaching 25 residential storeys (28 storeys above ground at a height of +94.65m AOD) above podium level, adjoined is a 'shoulder' extrusion of 5 storeys that steps down to the existing context along Ilderton Road. The tallest element of the proposal is situated north east of the site set back from Ilderton Road. The massing of the tower is reduced by the chamfering of edges expressing an elegant verticality. While the massing and height of the proposal contrasts with the mainly low-rise buildings of the surrounding area, it does not conflict with the prevailing pattern of development within the wider planned context. The proposal is a contextual response to the proposed varied and changing scales of the area and follows the tall building strategy contained in the AAP.

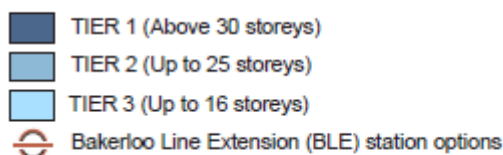
78. The proposed tall and mid-rise volumes create transitional scales, forming well articulated elevational designs. Building frontages have been generously set back from the edge of the urban plot to create an increased public realm. The removal of the existing hoardings facilitates a 5m setback on the western edge of the site which allows provision for an improved pedestrian and cycle footway. Setbacks of 2.4m are applied along Rollins Street and Sharratt Street, creating an increase to the streetscape along these secondary roads. At the North western corner the footprint has been recessed to create a public open space. The setback of the building massing provides a new public space at the entrance of the tower as well as providing a transition space between the new tower and the scale of the two storey terrace properties at the north. The proposed podium will have a strong street presence with the addition of an active frontage along Ilderton Road. A linear servicing route has been proposed adjacent to the railway viaduct to the east of the site; ensuring servicing requirements are to the rear of the development away from the residential uses. .

Draft OKR AAP

79. Policy 8 of the draft OKR AAP sets out a tall building strategy, the OKR 'Stations and Crossings' that should be adhered to in order to maximise the potential of the Old Kent Road. 'Tier One' buildings represent developments that exceed 30 storeys in height. These developments are proposed to be sited in the vicinity of the proposed BLE stations, to mark their city wide significance and optimise the use of land in the most accessible locations. A 'Tier Two' development proposes building heights within the range of 16 to 25 storeys. The strategic locations of Tier Two buildings located along important crossings and junctions of the Old Kent Road, and near to the boundary between Ilderton Road, New Bermondsey and the Old Kent Road. '*Tower block*', at a height of 25 storeys is compliant with the height range proposed within the AAP.
80. The AAP states that other buildings in the area will vary in height from 8 to 16 storeys depending on their immediate context. Given that the proposed '*southern block*' has a height of 6 storeys above the podium space, its proposed height is in line with the requirements of the draft OKR AAP.

Image: The 'Stations and Crossings Strategy in the draft OKR AAP





81. In line with the draft OKR AAP, the design of the tall buildings would be exemplary, with careful consideration of their impact on the skyline. The separation distance between the two buildings above the ground floor successfully enables the development to provide amenity and play space on the podium, and terraces located on the 7th floor of each respective building. The distance between the two buildings facilitates sufficient space that allows natural daylight to reach key habitable windows within the development.

London Plan (2016)

82. As the development would be substantially taller than its existing surroundings, it would be defined as a tall building in the adopted London Plan (2016). Policy 7.7 of the 2016 London Plan, 'Location and Design of Tall and Large Buildings', states that tall buildings should be limited to sites in the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport. Furthermore, London Plan Policy 2.13 requires development in Opportunity Areas to optimise residential and non residential output densities, meet or exceed minimum housing and employment guidelines and support wider regeneration objectives. Annexe 1 of the 2016 London Plan sets out the specific requirements for the Old Kent Road Opportunity Area, identifying it as having significant potential for residential- led redevelopment. As such, the Old Kent Road Opportunity Area is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. The proposed development is considered to achieve both, whilst also meeting the other requirements of London Plan Policy 7.7.
83. National, Regional, and Local Policy state that the impact of tall buildings in sensitive locations, including the settings of conservation areas and listed buildings should be given particular consideration. In acknowledgement of the subject site not being within the boundaries of a conservation area, the closest sensitive location is the Grade II Listed Gasholder 13 located circa 395 metres southwest of the subject site. The specific impact of the proposed development on this sensitive setting, and the wider townscape context is assessed in more detail below where the submitted Townscape and Visual Impact Analysis (TVIA) is considered.
84. Ilderton Road is dominated by Industrial land and uses with limited active frontages and poor urban streetscapes. It is considered that the industrial nature of the existing townscape is not considered worthy of protection. The replacement of the industrial use with a high quality architectural mixed use scheme is a significant public benefit of the proposed development.
85. The uplift of existing B8 floorspace and the introduction of B1c Affordable workspace along with the delivery of housing (including affordable housing), and a generous Children's play space and general amenity space would deliver significant contributions to local regeneration. Furthermore, the improvements to the public realm would be appropriately landscaped, and would increase permeability when moving through or past the site.

86. The impact of the proposed development on microclimate, wind turbulence, overshadowing, noise, aviation, navigation and telecommunication interference is all assessed and presented elsewhere in this report. In the majority of cases however, there would be no significant adverse impacts. Please see the relevant section of this report for more detail.

Southwark Plan

87. As the most recently adopted document in the Local Plan, and the only document adopted after the Old Kent Road was designated as an Opportunity Area with significant potential for residential-led redevelopment, it is considered that these London Plan (2016) policies in relation to tall buildings are more relevant than Southwark Plan Saved Policy 3.20 dating from 2007. Nevertheless, the proposed development has also been assessed against the requirements of this saved policy. Saved Policy 3.20 requires any building over 30 metres tall to ensure that it:
- Makes a positive contribution to the landscape; and
 - Is located at a point of landmark significance; and
 - Is of the highest architectural standard; and
 - Relates well to its surroundings, particularly at street level; and
 - Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
88. The development has provided a number of significant extensions to the public realm. The development has been set back in the urban plot creating a generous 5m extension to the existing footway at the western edge. As a result a pedestrian focused streetscape with the provision of street trees and active frontage is provided, recreating the public space at Ilderton Road. Entrances to the residential units are at the northern and southern ends of the site encouraging increased movement along Rollins street and Sharratt Street. A linear circulation for servicing has been provided at the eastern edge of the street, removing immediate servicing requirements from Ilderton Road.
89. It is considered that the tall buildings value lies in forming a local landmark. The existing railway line provides a physical barrier between boroughs Southwark and Lewisham. The tower will provide urban legibility, positioned along the eastern edge of the railway viaduct at the junction of borough boundary. The OKR AAP intends to create a green link to the park at Bridgehouse Meadows 250m to the east of the site, the tower will assist as a wayfinder to and from that space.
90. The articulate composition of the tower expresses verticality, with stepped balconies, a clear vertical order and chamfered corners. Stepped modelling of the upper floors adds interest and definition to the top of the tower, distinguishing from the main body. The top faceting creates architectural interest as well as allow further light into the depth of the plan providing second aspects to many units. Deep reveals and recessed corners accentuate the slenderness of the tall building.
91. The tower entrance is formed as a permeable double height brick portico entrance that has a grand presence at street level. The extension of public space at the north east corner improves the streetscape. The materiality of the tower has been composed to integrate with the rest of the AAP development to create a coherent set piece. Tonal alterations of brickwork emphasise reveals and elevational details.
92. The tall building relates well to its immediate surroundings, both in terms of its base

and its general design. The double-height entrance creates a sense of openness and permeability. The scale and the robust quality of the outer brick columns relate to the industrial character of the area and the adjacent railway arches. Its contextual relationship is the detailing and material finishes of the building itself, with its elevational architecture and industrial connotations. It brings interest to the street scene and setting of the developing area.

93. The chamfering and recessed elements at the top of the tower, help to decrease the overall massing impact as well as provide an articulated aesthetic that adds visual interest to the building from longer and shorter views. It is considered to contribute positively to the London Skyline.

Architectural design and materiality

94. The proposed scheme has been designed as a singular piece within the urban fabric, despite the mixed of uses the urban blocks are composed to be visually coherent. Each block of the scheme is well-designed in terms of their individual functional qualities, but also in creating a mixed use development that compliments the industrial character of the area.
The ground floor industrial and commercial unit's benefit from 7m heights, allowing for future adaptation of the space, considered a sustainable approach. The ground floor units facilitate an active frontage at the western edge of the site. An alteration in entrance designs creates interest as well as defining residential and industrial separation. Both residential entrances are double height to create a sense of openness and permeability into the foyer, ensuring that the residential apartments above have a prominent ground floor presence.
95. The residential tower has a definitive base middle and top, the vertical articulation of the tower reduces its over massing and creates a clever plan form. Further recessing at the top of the tower adds visual interest for longer and shorter views as well as creating an interesting silhouette. The proposed U-block has a curved deck access to the dual aspect apartments facing the courtyard. Voided areas beside entrances create a level of privacy to the apartments, with separation from the main walkway avoiding the creation of a narrow utilitarian corridor space. It should be ensured that this 'gallery access' is well lit and landscaped to create an inviting environment.

Image: Vertical articulation of the tower block with reduced massing at the top



96. The proposal uses a minimalist material palette, predominantly brick to inform the industrial context of the area. The pale blush brick will create an elegant finish across the development. A darker brick wraps the skirt of the scheme and architraves of ground floor entrances unifying the singular urban block.
97. The proposed design is well conceived and executed. The detailed massing and façade treatments work well together to articulate the built form, following the existing industrial character of the area. The development offers a variety of transitioning scales and an appreciation of the existing and emerging the local context. Overall, the architecture is effective and engaging. However, much will depend on the final materials and detailing, and therefore conditions have been attached to this decision to ensure the highest quality to the scheme.

Images: View of development from Ilderton Road looking south



Landscaping

98. The proposed development would consist of a hard and soft material palette. The hard landscaping would provide high quality and durable materials for the podium and public realm that includes landscape furniture such as cycle stands. The soft palette would balance aesthetic, ecological and maintenance issues. This involves plant species that would be chosen on seasonal interest, durability, suitability for elevated locations, and maintenance requirements. Furthermore, ecological and biodiversity landscaping is proposed that focuses on enhancing the ecological value of the development.
99. The design for the landscape and public realm would also balance the needs of residents and employees working on the ground floor. A simple and robust public realm on the ground floor is contrasted by the verdant garden and terraces on the upper levels. The open aspect to Ilderton Road to the west, and the railway line to the east provide a visual connection to the street below, as well as long distances views of the surrounding neighbourhood.
100. The proposed landscaping at the ground floor level would increase the area of public realm by removing the existing advertisement hoardings that currently front on to Ilderton Road. The space would be increased from 1.80 metres in width to 5 metres in width. This additional space facilitates extra circulation and permeability benefits to pedestrians entering, leaving or moving past the site. Further space is afforded to the public realm next to the main residential entrance on the corner of Rollins Street and Ilderton Road.
101. The hard landscape treatment to the public realm takes inspiration from the tough and hard working surfaces in the area. Standard surface treatments are proposed to each street frontage to be in keeping with the surrounding streets. Permeable resin bound gravel is used to surface tree pits to proposed trees. The main residential street entrances are marked with a Herringbone Dutch brick paver 'doormat'. The soft landscape palette to the ground floor public realm is restricted to semi-mature

trees along each street frontage. The trees along Ilderton Road and Sharratt Street are a native Field Maple, with the three trees at the corner of Ilderton Road and Rollins Street providing a mix of species that enhances the main entrance to the development.

102. Two roof terraces, one in each residential block, would consist of an Ecology Terrace to the '*tower block*' and a Play Terrace to the '*southern block*'. Both spaces are located on the 7th floor within each block. The Ecology Terrace includes grassland with stepping stones reaching to circular lawn spaces and timber seating benches. It would provide a mix of ornamental grasses, ferns, bulbs, herbaceous perennials, five trees and bird boxes located throughout to enhance the ecology and biodiversity of the space. The Play Terrace comprises of a colourful grid of blocks with five multi-stem trees planted within. This terrace would also consist of a viewing gallery that would provide views primarily to the south of the development.
103. To the podium level, the landscape palette consists of a diverse, sustainable and drought tolerant species. The podium would provide space for 16 trees, concrete planters, and mixes of ornamental grasses, ferns bulbs and herbaceous perennials. Climbers are to be planted along a lightweight metal structure that connects the openings at the edge of the building to the central lawn.
104. The central podium and play terrace located on the 7th floor of the '*southern block*' would accommodate the Children's Play space that is to be contained within the development. The play space is to be provided primarily for the Under 5 age group and for the 5-11 age group. In total, 909 sqm of Children's play space will be provided within the development. At the podium level, the play space is to be located centrally between the two residential towers. The incorporation of Children's Play Space into the Central Podium enables the area to function as a mixed use and multi-functional play and general amenity area within the development. Subject to a condition attached to this decision, the final design and details submitted for the Children's Play space would be reviewed by Planning Committee Members.

Image: Preferred Podium and play space elements

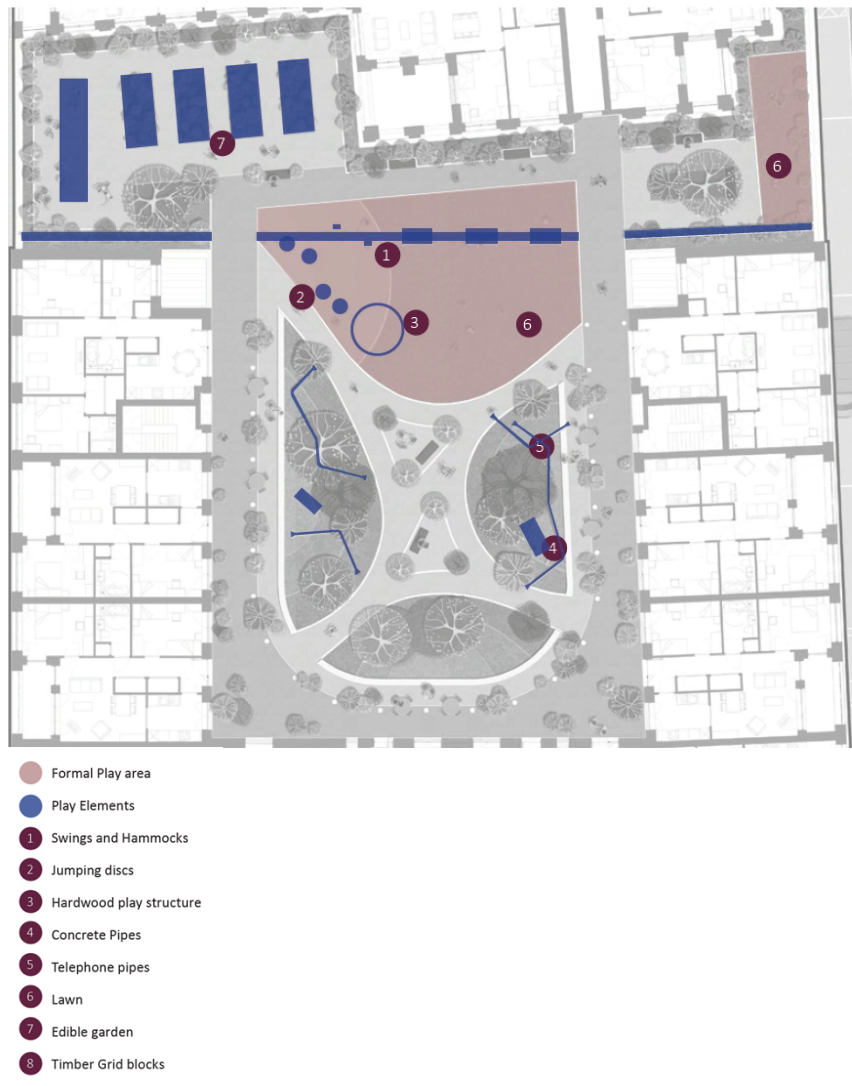


Image: 7th floor Ecology Terrace and Play Terrace in the 'Southern block'





105. The council's Ecology Officer has reviewed the proposals. As the subject site is adjacent to a borough Site of Importance for Nature and Conservation (SINC), it is advised that lighting used in the scheme should, where possible during the construction and operation phases of the development, be designed to avoid impacting on the railway embankments and bridges to the east of the site. This is advised by the Ecology Officer in order to minimise the disturbance to bats which may opportunistically use these linear features for commuting to foraging habitat in the wider area. Such lighting could include the installation of bollard lighting, use of warm-white LED lighting, directional installation of lighting, installation of recessed external lighting.
106. There is the potential to provide an increase in onsite roosting opportunities for bats through the incorporation of bat boxes into the design of the development. General purpose bat boxes (such as the Schwegler 1FF mentioned in Appendix 3 of the submitted Preliminary Ecology Appraisal) could be installed on buildings or newly planted trees in the post-construction phase of the development. It is considered that these boxes offer suitable roosting conditions for a range of crevice dwelling bat species such as the common pipistrelle. This enhancement of biodiversity would be in line with the Section 15 of the NPPF and the New Southwark Plan (2017) Policy SP59, which seeks to provide biodiversity net gain at sites of development.
107. Within the Preliminary Ecology Appraisal submitted as part of this proposal, the council's Ecology Officer welcomes the creation of an Ecology Terrace on the 7th floor of the 'tower block' that creates additional green infrastructure. Furthermore, the applicant is advised that habitat creation within the development should include native shrub and scrub planting for the benefit of bats, invertebrates, and birds. The landscape planting should also include species of local provenance and species that have known benefits to wildlife.
108. Conditions recommended by the council's Ecology Officer have been attached to this decision to ensure that the ecological benefits of the scheme are maximised.
109. The public realm, streetscape and communal amenity spaces, would be fully accessible, and provide a level threshold between internal and external spaces and across the open spaces.
110. The security of existing and new residents has also been considered, with lighting arranged around the central podium, and the Ecology and Play spaces on the 7th floor of each respective residential building. The lighting has been strategically placed so that there are no hidden corners within the development. A lighting strategy would be secured by condition and the metropolitan police are satisfied that this scheme could achieve Secured By Design accreditation.
111. The landscape details submitted to date are considered to be of good quality and appropriate for the development of this part of the Old Kent Road Action Area. Final details of the design, materials and planting proposed would be required by

condition.

Trees

112. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
113. There are no tree or landscape constraints on, or adjacent to the subject site. Given that the site currently contains no trees, the development would result in a significant increase to the number of trees. Locations for the trees include street trees on the public space fronting Ilderton Road and Rollins Street, on the central podium, the 7th floor roof terraces at each residential tower, and also at roof level.
114. The council's Urban Forester recommends a specific tree planting condition is attached to this decision to ensure that the trees are provided, especially on the Ilderton Road and Rollins Street locations. In the event that these or other trees proposed within the red line boundary of the site are not feasible, a payment in lieu can be agreed for provision elsewhere within the subject site. The council's Urban Forester also recommends that as part of the S106 Agreement, funds should be identified for investment of nearby open spaces such as Bramcote Park.

Southwark Design Review Panel (DRP)

115. The proposed scheme was presented to the Southwark DRP on 11th March 2019. Whilst the meeting was fairly positive, members of the DRP highlighted a range of concerns. From this the applicants have adjusted the scheme with four key changes to the overall development being incorporated following the meeting. The adjustments are discussed in detail below:

DRP: 11th March 2019

116. DRP comment:

The Panel felt the plan form and arrangement of units in the tower were very good. They enjoyed the set-backs at the corners and the recessive modelling at the top added interest to the design. The Panel recognised that this proposal was evocative of a similar tower designed by this architect at St George's Circus and they welcomed this reference. They encouraged the architects to develop the design further and to broaden the palate of materials especially on the tower to give it a more refined appearance and to distinguish it from the buildings around the base of the block.

117. Response to DRP comments:

The base of the tower was amended to include a more articulated plinth that distinguishes the more commercial base from the residential tower above. It was considered that a more proportioned and more significant covered entrance be proposed for the tower that better relates to the new public space as well. A palette of high quality materials were integrated with simple and crisp detailing. Furthermore, the tower was further refined to reveal a more faceted and visually intricate top.

118. DRP comment:

The Panel questioned the detailed design of the U-shaped deck-access block. They felt the uniform height applied across the block gave it a monolithic and overbearing appearance especially on Sharratt Street and overshadowed the courtyard. They encouraged a step down on the southern edge of the U-shaped block and felt that a 2-storey step-down was the minimum necessary along that Sharratt Street face. Such a step down would break down the block into its constituent parts and also improve solar penetration into the elevated courtyard.

119. Response to DRP comments:

A 'step down' has been retained on the 7th floor of the Sharratt Street elevation to (a) break up the massing (b) provide amenity space and (c) improve the level of solar penetration into the courtyard. A curved access gallery is proposed that pulls away from the internal corners and long façades, thereby providing privacy to any rooms looking onto the access gallery. It also provides each entrance with its own semi-private threshold and separation from the walkway. These can be used by residents for plants or other domestic features to soften the interior architecture and create a welcoming feel. The curved access also creates a series of openings that allow light to penetrate down to all levels.

120. DRP comment:

When they considered the elevated garden which is also the communal amenity for residents the Panel questioned its detailed design, scale and proportions. They enjoyed the communal 'feel' of the courtyard which arises from it being surrounded by the deck-access apartments. However, they requested more information including cross-sections across the block with figured dimensions, as well as more details about the deck-access spaces.

121. Response to DRP comments:

A detailed landscaping strategy for the courtyard has been submitted with the application including scale drawings in cross section and a sun path analysis. The space would be a safe and attractive environment for neighbours to meet and interact. The space includes shaded woodland planting, lawns, seating / relaxing spaces, a growing garden, as well as play areas for all ages.

122. DRP comment:

When they considered the commercial ground floor plan the Panel had concerns that the lack of detail resolution of this aspect of the project compared with the residential. They noted that the main structural columns of the tower for example did not appear on the ground floor plan and this could have a serious impact on the practicality and usability of this space. The Panel also raised questions over the impact of this proposal on the Ilderton Road frontage. This eastern edge of the site is important to this proposal and one that should benefit from active uses along its length. It should not be the windowless flank of a factory space which is what it is at the moment.

The Panel encouraged the architects to review their proposals and to consider this as an important active façade. The brief requires affordable workspace and every light Industrial or logistics facility has administrative, research and/or retail requirements all of which could be better located on the important Ilderton Road frontage in order to contribute positively to the street scene.

123. Response to DRP comments:

Active frontage associated with both the residential and commercial uses are proposed along Ilderton Road and the corners of Rollins Street and Sharratt Street. By positioning the warehouse in the centre of the plan, it allows the more active ancillary uses, such as office space and staff facilities, to occupy the street frontages.

Heritage and townscape considerations

124. London Plan (2016) Policy 7.4, Local Character, states that development proposals should respond to their context, including buildings, open spaces, street patterns and the historic environment and Policy 7.8, Heritage Assets and Archaeology, seeks to record, maintain and protect London's heritage assets in order to utilise their potential within the community. It states that development should conserve the significance of any heritage asset it affects. Southwark Core Strategy Strategic Policy 12, 'Design and Conservation', states that development should ensure that the significance of built heritage assets is conserved. Saved Policy 3.15, Conservation of the Historic Environment of the Southwark Plan (2007) states that development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance and Policy 3.18, Setting of Listed Buildings, Conservation Areas and World Heritage Sites states that the immediate or wider settings of designated heritage assets must be preserved. The NPPF (2019) requires Local Authorities to consider the impact of a proposed development on the significance of a designated heritage asset. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should be categorised as either substantial or less than substantial. Substantial harm should only be permitted in exceptional circumstances. Less than substantial harm should be weighed against the public benefits of the proposal.

Conservation areas

125. The application site does not sit within a conservation area and it contains no listed buildings. There is however, one conservation area within 1km of the site, meaning that their settings could be impacted upon by the proposed development. The conservation area is listed below:

Table: Conservation areas within 1km of the application site

Conservation Area	Distance from Application Site
Caroline Gardens Conservation Area	Approximately 520m

126. Also within the area between the subject site and Caroline Gardens are a number of Grade II listed buildings and structures, including the following:

- Nos. 864 and 866 Old Kent Road;
- Nos. 880, 882 and 884 Old Kent Road;
- Licensed Victuallers Benevolent Institution (Caroline Gardens);
- Licensed Victuallers Almshouses (Caroline Gardens);
- Gasholders Nos.13

Draft OKR APP and Draft Local List

127. Although of very limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. The following buildings, within the immediate vicinity of the site, are identified as such. These buildings are also included on the draft Local List published by the council in March 2018. The following are within or immediately adjacent to the application site:
128. The following buildings are within the immediate vicinity of the application site:

Table: Draft AAP Building or Feature of Townscape Merit within the immediate vicinity of the site:

Property	Description
209-225 Ilderton Road	Building of Townscape Merit
Penarth Centre, 30 Penarth Street	Building of Townscape Merit
Christ the King Chapel, 8 Manor Grove	Building of Townscape Merit

Townscape and Visual Impact Assessment (TVIA)

129. The submitted TVIA appraises ten viewpoints which demonstrate that whilst the proposed development will introduce substantial change to the Site and its locality, such change can be accommodated when considering the cumulative developments without unacceptable effects on townscape character, and visual amenity of the wider landscape. Six of the ten viewpoints are considered to be sensitive and are shown below with an individual assessment undertaken within each proposed viewpoint. Additionally, London View Management Framework (LVMF) Views have also been taken into consideration as part of this report. The view from Parliament Hill forms one of the six viewpoints considered as part of this development.

London View Management Framework (LVMF) Views

130. London Plan (2016) Policy 7.11, London View Management Framework, and Policy 7.12, Implementing the London View Management Framework, relate to the identified strategic views in London. They state that development should not harm these views, and where possible should make a positive contribution to the characteristics and composition of strategic views. Supplementary Planning Guidance on the LVMF was published in March 2012.
131. The LVMF view likely to be impacted upon by the proposed development is from Parliament Hill, approximately 11km northwest of the subject site.

View 16 (LVMF 2A.1 Parliament Hill)	
View location	The summit of Parliament Hill
Heritage Significance	LVMF protected view. The view crosses a wide span of London. The foreground is occupied by the open space

	of Hampstead Heath. The tall buildings of central London appear in the distance, including the City of London cluster. The vista to St Paul's Cathedral in the centre of the view is protected.
Other Significance	Public open space.
Sensitivity to change	High
Impact of proposal	The ' <i>tower block</i> ' building of the development would be visible in the distance to the east of The Shard. The building would not have an impact or disrupt views of St. Paul's Cathedral.
HE Comments	None
Conclusion	The proposed scheme would have no impact on the silhouette of St. Paul's Cathedral or the ability to appreciate St. Paul's in this view. As the silhouette of the Cathedral would be preserved, and the wider setting consultation area would not be encroached upon, it is not considered that there would be any harm to this view. Furthermore, the Shard would remain the tallest feature in the view.

Local Views

132. The five remaining viewpoints of the submitted TVIA considered in this report are from locations nearby that have been assessed due to their potential impacts on Grade II Listed buildings and structures within the borough boundaries.

Viewpoint 1	
View location	Bridgehouse Meadows
Heritage Significance	None
Other Significance	Gasholder no. 13 is visible in this viewpoint and is identified as a Grade II Listed structure within Southwark
Sensitivity to change	High.
Impact of proposal	From this location, a block of four storey blocks of flats are visibly in the central view. In the wider view, the Listed Gasholder is visible to the left side, with the high-rise buildings within Elephant and Castle visible in the distance. The development would be visible in the centre of this view, but would be some distance away from the Listed Gasholder as to not harm or disrupt views of its setting.
HE Comments	None
Conclusion	The proposed development would not harm the setting of the Grade II Listed Gasholder no. 13.

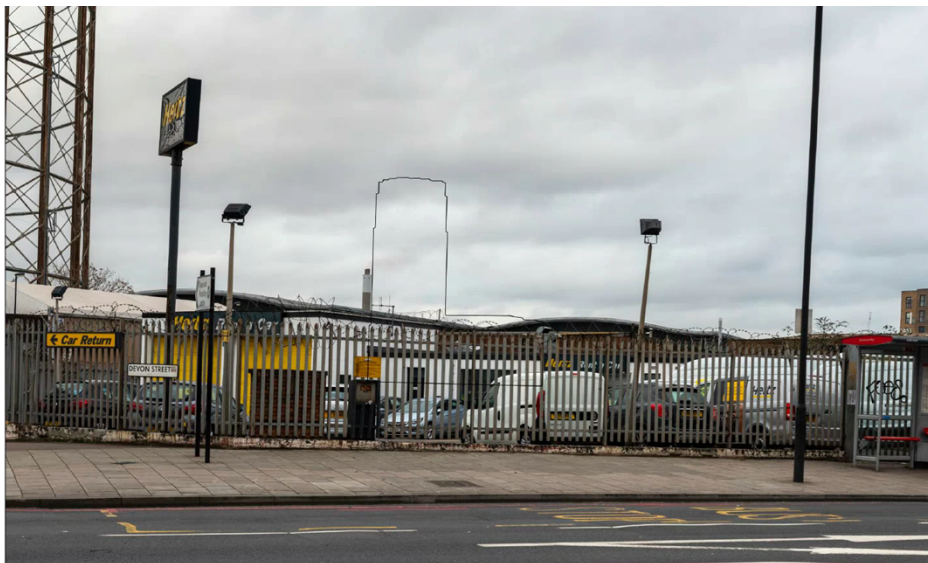
Image: Viewpoint 1 showing the existing view and proposed view:



Viewpoint 3	
View location	Junction of Commercial Way and Old Kent Road
Heritage Significance	None.
Other Significance	Gasholder no. 13 is visible in this viewpoint and is identified as a Grade II Listed structure within Southwark
Sensitivity to change	Low
Impact of proposal	This view looks southeast with the Gasholder visible to the left of centre with the roof of the Southwark Recycling centre visible in the distance, with the Hertz Car Rental Company visible in front centre of this view. The proposed ' <i>tower block</i> ' would be visible in the distance in the centre of the photo and would not impede on the views of the Grade II listed Gasholder no. 13
HE Comments	None
Conclusion	As the proposal is located away from the main viewpoint

	of the listed Gasholder no. 13, it would not harm the significance of the heritage asset.
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Image: Viewpoint 3 showing the existing view and proposed view:



Viewpoint 4	
View location	Southwark Park
Heritage Significance	Medium. Southwark Park is a Grade II Registered Park and Garden, and the Grade II Listed former Clare College Mission Church is visible from this view looking southeast to the subject site
Other Significance	None.
Sensitivity to change	Low
Impact of proposal	Current views southeast are screened by mature tree canopies even during the winter months when trees are not in leaf. The upper 16 floors of the 'tower block' would be visible from this viewpoint; however, as noted, the

	views are restricted by the existing mature trees around the perimeter of the park.
HE Comments	None
Conclusion	The proposal would not impact on the setting of Southwark Park, nor would any visual amenity impacts arise from the proposed development in this viewpoint

Image: Viewpoint 4 showing the existing view and proposed view



Viewpoint 7	
View location	Burgess Park
Heritage Significance	Medium. Burgess Park is a Locally Listed Park designated as Metropolitan Open Land.
Other Significance	None
Sensitivity to change	High
Impact of proposal	The Cobourg Road Conservation Area and Grade II Listed New Peckham Mosque are located centrally within the existing view. The proposed development would be partially visible from the upper floors of the 'tower block'; however, once the Malt Street development is completed, the 'tower block' would not be visible from this viewpoint

HE Comments	None
Conclusion	The impact on this view would not cause harm to the setting of the park, conservation area or listed building.

Image: Viewpoint 7 showing the existing view and proposed view



Viewpoint 10	
View location	North Lodge to Licensed Victuallers Benevolent Institution (Caroline Gardens) looking northeast
Heritage Significance	High.
Other Significance	None
Sensitivity to change	Low – given the separation distance (circa 540 metres) between the development site and the listed buildings.
Impact of proposal	The proposed development would result in the addition of considerable height and scale compared to the middle distance of the view. However, in this context, it is not considered to harm the setting of the listed buildings given the aforementioned separation distance.
HE Comments	None
Conclusion	It is not considered that the special architectural or historic interests of the listed building or their setting would be harmed from this development.

Image: Viewpoint 10 showing the existing view and proposed view



Conclusion on the Setting of Listed Buildings, Conservation Areas and Townscape

133. The following table summarises the designated heritage assets that could be impacted by the proposal, and what harm, if any has been identified.

Table: Impact on heritage significance

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
LVMF Views	No harm identified
Local Views	No harm identified
Caroline Gardens Conservation Area	Some less than substantial harm identified to setting given the separation distance to the subject site
Listed Buildings	Some less than substantial harm
Draft Locally listed buildings/ undesignated assets identified in the draft Old Kent Road AAP	No harm identified. Whilst the buildings are located nearby to the development the impacts would be less than substantial.

134. In conclusion, the proposed development would not have a significant impact on the views assessed despite it being a highly visible feature in the surrounding townscape. The development is considered to be a beneficial addition to the

viewpoints assessed due to its high quality of design which generates new interest in the skyline within Southwark.

135. Historic England and the Greater London Authority raised no objection to any of the viewpoints assessed. As the development is considered to significantly improve the appearance of the subject site, creates an active frontage along Ilderton Road, and facilitates a high quality design, the less than substantial harm to some of the surrounding assets is considered to be outweighed by the wider regeneration benefits of the proposal.
136. Whilst limited weight has been given to emerging policy, full weight has been given to adopted policies, including the NPPF (2019), London Plan (2016) and Southwark Plan (2007) and Core Strategy (2012). As can be seen from the assessment contained within this report, the proposals are considered to be in compliance with these adopted policies.

Housing mix, density and residential quality

Housing mix

137. Strategic Policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% 2+ bedroom units and 20% 3+ bedroom units. No more than 5% studio units can be provided and these can only be for private housing. At least 10% of the units should be suitable for wheelchair users. The housing mix requirements are replicated in the draft OKR AAP (Policy 5).
138. The proposed housing mix would be as follows:

Table: Proposed Housing Mix

Unit size	No. of homes	% of homes
Studio	12	4.72%
1 bed	89	35.04%
2 bed	102	40.16%
3 bed	51	20.08%
Total	254	100%

139. 60.24% of the proposed homes would have two or more bedrooms. This provision meets the minimum requirement for a development proposing two bedrooms or more. Furthermore, the allocation of 51 three bedroom units meets also meets the minimum requirement to be provide 20% three or more bedrooms in accordance with Strategic Policy 7.
140. Of the affordable housing units for, 17 are one bed units, 29 are two bed units and 30 three bed. The breakdown above demonstrates that the housing mix within the development is acceptable.

Table: Proposed housing mix broken down by tenure

Unit size	Private homes		Intermediate homes		Social rented homes	
	No.	%	No.	%	No.	%
Studio	12	6.67%	0	0%	0	0%
1 bed	72	40.44%	7	38.89%	10	17.24%
2 bed	73	41.10%	5	27.78%	24	41.38%
3 bed	21	11.79%	6	33.33%	24	41.38%
Total	178		18		58	

Wheelchair housing

141. Saved policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users and London Plan Policy 3.8 requires 90% of new housing to meet Building regulations M4(2) “accessible and adaptable” and 10% to meet Building Regulations M4 (3) “wheelchair user dwellings”. This is reiterated in emerging policy in the draft OKR AAP and the New Southwark Plan.
142. 26 of the proposed new homes would meet Building Regulations Part M4 (3) “wheelchair user dwellings”, which equates to 10.23% of all dwellings. Fourteen of the units would be private units, six would be for social rent, and six units would also be facilitated for the intermediate units. The social wheelchair unit provision equates to circa 23%, and is considered to be an acceptable level of provision which is reflective of the overall proportion of social rent homes proposed. Of the wheelchair units, the majority of would be provided in the 3-bed dwellings. The wheelchair user dwellings would be secured through the Section 106 Legal Agreement.

Density

143. Policy 3.4, Optimising Housing Potential, of the London Plan states that development proposals should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5, Providing New Homes, of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet.
144. Emerging Policy P9 of the New Southwark Plan seeks development within the Old Kent Road Opportunity Area (OKROA) Core to provide 650-1,100 habitable rooms per hectare. However, the OKROA allows development to exceed this range where it achieves exemplary standards of residential design. The development as a whole delivers 763 habitable rooms over 0.43 hectares. This equates to 2,009 habitable rooms per hectare calculated in accordance with the Residential Design Standards SPD 2011.
145. Since the maximum upper limit of habitable rooms per hectare would be exceeded, the development would need to demonstrate that it would provide exemplary

accommodation of the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then a high density in this Opportunity Area location would not raise any issues to warrant withholding permission. This is considered in the following table and paragraphs.

Table: Indicators of exemplary design

Indicators of Exemplary Design	Proposal
Provide for bulk storage	All of the units would exceed the minimum requirements for storage.
Exceed minimum privacy distances	Minimum privacy distances would not be exceeded in relation to the units within each respective building. Whilst the largest distance between the buildings is approximately 12.10 metres, at the smallest point it is circa 7.85 metres. Notwithstanding this, due to the units in the ' <i>southern block</i> ' all being dual aspect and having no windows in the north elevations at this narrow point, facing the tower the development retains a high degree of privacy for occupiers within the development.
Good Sunlight and daylight standards	The development has been designed to maximise daylight inside the dwellings and ensure good levels of sunlight to the external amenity spaces
Exceed the minimum ceiling height of 2.3m required by building regulations	All habitable room ceilings would be at least 2.5m high.
Exceed amenity space standards (both private and communal)	The private and communal amenity space standards are met. All three bed flats have balconies of at least 10 sqm and the required communal amenity space is provided, albeit not exceeded. A large communal courtyard is provided at podium level. Additionally, two communal roof terraces are provided with a community room in the ' <i>tower block</i> '.
Secured by Design Certification	The Met Police's Officers are satisfied that the development will meet the Secure by Design requirements. A condition is attached to this decision informing the applicant of the secure by design standards that are required to be adhered to.
No more the 5% studio flats	12 (4.72%) of the units proposed in the development are studio flats
Maximise the potential of	The existing site does not meet the potential that

the site	can be facilitated within the site. The proposed development is considered to enable the site to maximise its potential incorporating the existing B8 Use Class into a mixed use scheme providing B1c and C3 Use Classes that is of a high quality design.
A minimum of 10% of units are suitable for wheelchair users	All of the proposed dwellings are designed to meet the wheelchair accessibility standards set out in M4(3), Accessible and Adaptable Dwellings. 10.23% of these dwellings would be easily adaptable to meet the needs of a wheelchair user.
Excellent accessibility within buildings	
Exceptional environmental performance	London Plan compliance with respect to improvement on Building Regulations Approved Document L
Minimise noise nuisance between flats, through vertical stacking of similar room types	The proposed dwellings would be vertically stacked to minimise noise transfer. Wherever possible, living rooms would abut living rooms across party walls. The proposals would be designed to meet or exceed Building Regulations Part E - Resistance to the passage of sound.
Make a positive contribution to local context, character and communities	The proposal has been designed to contribute positively to the existing and emerging local character of the area. The use of high quality materials and simple, robust detailing will ensure the building stands the test of time. Furthermore, the removal of the existing hoardings along the Ilderton Road elevation will create a new active frontage onto Ilderton Road.
Include a predominance of dual aspect units	70% of the units, 177 of 254 within the scheme are dual aspect. None of the single aspect units are north facing. 92% of the affordable homes are dual aspect, 60% of the private homes are dual aspect.
Have natural light and ventilation in all kitchens and bathrooms	<p>Within the development, most of the kitchens are combined with a dining area. Where kitchens are separate they would have window openings. The three bed affordable units in the southern block would all have separate kitchens.</p> <p>All bathrooms would be internal. These would be provided with mechanical ventilation, a common approach to flatted development.</p>
At least 60% of homes contain two or more	60.24% of the proposed homes would have two or more bedrooms.

bedrooms	
Significantly exceed minimum floor space standards	<p>All dwellings exceed the minimum space standards set out in Southwark's Residential Design Standards SPD, including extra floor space for wheelchair accessible units. The breakdown of extra sqm for the dwellings is as follows:</p> <p>0% - 5% oversized: 100 units (39% of total) 5% - 10% oversized: 140 units (55% of total) 10% + oversized: 14 units (6% of total)</p>
Minimise corridor lengths by having an increased number of cores	<p>The compact nature of the <i>tower block</i> keeps corridor lengths short. Private entrance doors are arranged in pairs to create a more neighbourly atmosphere.</p> <p>The southern block, has deck access and the two additional stairs at either end of the gallery deck provides additional routes to the podium courtyard. The deck access nature of the affordable block is a particularly positive aspect of the schemes design.</p>
No more than 8 units per core	<p>The <i>'tower block'</i> has a maximum of eight units per core.</p> <p>The <i>'southern block'</i> has 10 units per floor; however, the core is centrally positioned to an external deck access gallery that is open to the air and natural light. The gallery forms two wings to the building, with one providing access to 6 units and the other providing access to 4 units, each with a stair accessing the podium.</p>
Achieve exemplary architectural design	The architectural design proposed for the buildings is of the exemplary standard.

Quality of residential accommodation

146. Saved Policy 4.2 of the Southwark Plan states that development should achieve good quality living conditions and include high standards of accessibility, privacy and outlook, natural light, ventilation, space, safety and security and protection from pollution. This policy is further reinforced by the Residential design Standards SPD 2011 (including 2015 Technical Update).

Unit Size

147. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 (including 2015 Technical Update).
148. All proposed homes would meet or exceed the standards as set out in the SPD. The following table sets out the minimum flat size requirements as set out in the

Residential Design Standards SPD, and also the flat sizes that would be achieved:

Table: Proposed flat sizes

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm)*
0 Bed 1 Person (Studio)	39 sqm	42.27 sqm
1 Bed 2 Person (flat)	50 sqm	51.05 – 55.13 sqm
2 Bed 3 Person (flat)	61 sqm	63.52 – 83.77 sqm
2 Bed 4 Person (flat)	70 sqm	70.74 – 74.95 sqm
3 Bed 5 Person (Flat)	86 sqm	86.63 – 114.78 sqm

* This includes wheelchair accessible homes, which have higher space standard requirements

149. The private and intermediate units within the '*tower block*'. Larger three bedroom units are concentrated to the lower levels and the top three floors. Where possible, layouts have been designed to position a window in the resident's line of sight immediately upon entering the unit. All units within the '*tower block*' would be served by open plan rooms that combine kitchen/living/dining into one space. The '*southern block*' facilitates the provision of the social rent units of the development. In this block there is a weighting towards larger family sized dwellings. All units, with the exception of one stack, are accessed from an external gallery which enables the all of the social rented units to be dual aspect. The depth of the block allows living spaces to span the full depth of the plan, providing natural light to the both the kitchen and living/dining spaces. It is considered that the larger three bed units in this block are more likely to be fully occupied than in the private units in the adjacent '*tower block*'. As such, all 3 bed units have been designed to have a kitchen/dining room separate from the living room to cater for a number of activities taking place simultaneously.
150. Overall, it is therefore considered that the flat sizes and layouts are acceptable, and would provide a good quality of accommodation.

Internal daylight and sunlight

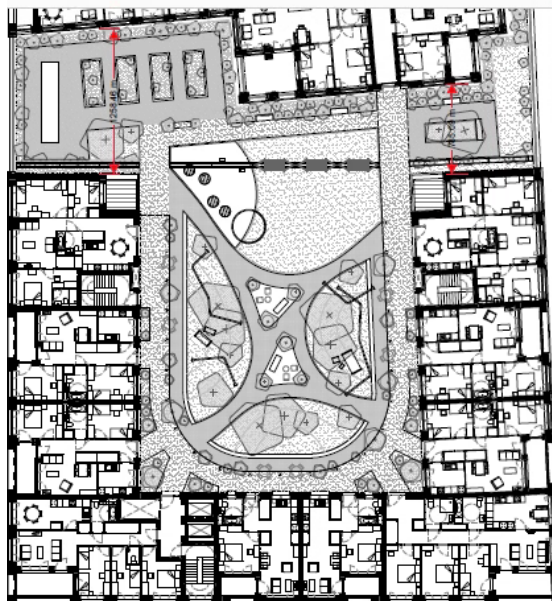
151. An Internal Daylight and Sunlight report, based on Building Research Establishment (BRE) Guidance, has been submitted. This considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. The guidelines also recommend that in cases where a room serves more than one purpose, the minimum ADF should be that for the room type with the higher value. Accordingly, in an open plan Living/Kitchen/Dining (LKD) room, the BRE recommends minimum ADF of 2%. The report submitted in this case however, argues that the principal use of LKD rooms is as living rooms and accordingly the minimum ADF should be 1.5%.
152. Winter gardens and balconies within the development and the rooms that they serve are predominantly separated by glazing. The winter gardens therefore provide well daylight spaces attached to the main living area, and contribute to the overall levels of internal daylight. Given this, the submitted document provides two ADF

figures for LKD, and one including the area of the associated winter gardens in the calculations. Out of the 737 habitable rooms assessed 659 rooms (89%) with Winter Gardens not included in the analysis meet the 1.5% target for LKD. When the Winter Garden is included in the analysis, 683 rooms (93%) meet the 1.5% LKD target. The results demonstrate that the overall daylight amenity within the proposed development will be very good, and further emphasises the overall quality of accommodation

Overlooking and privacy within the proposed development

153. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12m between the front elevations of buildings and/or across a highway, and a minimum of 21m between rear elevations.
154. The closest distance between the two residential blocks on the Ilderton Road elevation is approximately 12.10 metres. Towards the rear of the buildings the closest point is approximately 7.85 metres apart. Whilst this is not compliant, the units in the '*southern block*' are all dual aspect and have no windows in this north facing elevation. The flats have been designed to maintain privacy and overcome the concern regarding the distance between the buildings at this point.

Image: Distances between '*tower block*' and '*southern block*'



Conclusion on Quality of Accommodation

155. In light of the assessment above, the quality of residential accommodation proposed is considered to be a great feature of the development, and the future occupiers will enjoy adequately sized units that do not impinge on circulation or movement. The addition of a generously sized podium courtyard and deck access dual aspect flats further enhances the excellent quality of accommodation within the scheme.

Outdoor amenity space, play space and public open space

156. Saved Policy 3.11, Efficient Use of Land, of the Southwark Plan (2007) requires a “satisfactory standard of accommodation and amenity for future occupiers”. Saved Policy 4.2. Quality of Residential Accommodation requires that all residential development provide an adequate amount of useable outdoor amenity space, and that the nature and scale of the amenity space should be appropriate to the location of the development, and the character of the area.
157. Four categories of open space are required in major planning applications in the Old Kent Road Opportunity Area:
- Private amenity space (usually gardens, balconies and winter gardens);
 - Communal amenity space (usually courtyards, podium gardens or roof terraces);
 - Children’s play space; and
 - Public open space.
158. The requirements for private amenity space, communal amenity space and children’s play space are set out in adopted policy and the Residential Design Standards SPD. The requirement for public open space is specific to the Old Kent Road Opportunity Area and set out in the draft Old Kent Road Area Action Plan. The policy position on each is set out in turn below:

Private outdoor amenity space

159. The supporting text to Strategic Policy 7, Family Homes, of the Core Strategy (2011) states that family housing must provide a minimum of 10sqm of private amenity space to ensure that children have somewhere safe to play. It also states that new developments must provide additional communal play areas for children, as required by the Mayor’s Supplementary Planning Guidance on Providing for Children and Young People’s Play and Informal Recreation (there is further detail on play space requirements below).
160. The private outdoor amenity space requirements are clarified further in the 2015 Technical Update to the Residential Design Standards SPD, as follows:
- Units containing three or more bedrooms should provide 10sqm of private amenity space; and
 - Units containing two bedrooms or fewer should ideally provide 10sqm of private amenity space. Where this is not possible, any shortfall should be added to the communal amenity space requirement; and
 - Private amenity spaces must be at least 3sqm in area.
161. The Residential Design SPD also states that a development is within an immediate proximity of a substantial area of public open space, accessibility to the open space, combined with better outlook, and may justify less amenity space as part of the development. In these circumstances a planning contribution may be required to provide improvements to off-site public amenity space.
162. In light of the above supplementary guidance, it is assumed that all units require 10 sqm of private amenity space; the total requirement would be 2,540 sqm (i.e. 254 units x 10 sqm). All of the proposed three bedroom units within the scheme either

meet or exceed the 10sqm requirement. All one bedroom units have at least 5+ sqm balconies, and all two bedroom units are provided with 7+ sqm balconies. The total amount of private amenity space within the scheme is 2,087 sqm which gives a shortfall of 453 sqm from the requirement. This shortfall is as required by supplementary guidance provided in the communal space within the development.

Communal amenity space

163. In order to comply with the requirements of the Residential Design Standards SPD, 50sqm communal amenity space per development should be provided. This should be provided in addition to the requirement to compensate for any shortfall in private amenity space.
164. The communal requirement comprises a minimum of 50 sqm, plus the 453 sqm shortfall from the private, which equals 503 sqm. A total of 503 sqm of communal amenity is proposed. Two areas within the scheme provide communal amenity are as follows:

Podium Courtyard (284 sqm communal amenity space 794 sqm play space): Located on the level between the residential towers above the B1c and B8 floor space.

Ecology Terrace (224 sqm communal amenity space): Located on the 7th floor of the 'Tower block'.

Community Room (76 sqm, this doesn't count to the communal amenity space total): Located on the 7th floor of the 'Tower block' opening on to the ecology terrace.

Private and Communal Outdoor Amenity Space Calculations

165. The following table summarises the private and communal amenity space requirements, against that proposed. All the podium courtyard and terrace communal amenity and play spaces would be accessible to all residents.

Table: Proposed external private amenity space for the development, and shortfall against policy requirements

Private amenity space proposed (Private balconies and terraces)	Dwelling size	Residential Design Standard SPD (2011) requirement (Para 3.2 New flat developments. Outdoor amenity space (page 23))	No. of flats and amenity Proposals	
	3 beds	10 sqm	All three bed homes would have at least 10sqm private amenity space.	Compliant
	1-2 bed flats	Up to 10m2 should ideally be provided. Where this is not possible the remaining amount	89 x 1 bed flats 102 x 2 bed flats All 1-beds have 5+ sqm	Not possible to provide all flats with 10sqm balconies or

		should be added to the communal amenity space. For example, if a private balcony of 3sqm can be provided, 7sqm should be added onto the communal amenity space.	balconies All 2-beds have 7+ sqm balconies	additional internal living space, resulting in a 453 sqm shortfall.
Total shortfall		Total requirement would be 2,540 sqm	Total provided = 2,087 sqm	453 sqm

Table: Proposed external communal amenity space in the development, and remaining shortfall against policy requirements

Communal amenity space (excluding play space)	Required	Proposed
	50 sqm plus 453 sqm =503 sqm	503 sqm

166. As demonstrated in the tables above, the provision of private and communal amenity space would meet the design guidance requirements.

Children's play space

167. The supporting text to Strategic Policy 7, Family Homes, of the Core Strategy (2012) states that new developments must provide communal play areas for children, as required by the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space, covering a range of age groups. The updated GLA Child Play Space Calculator has been used in assessing this application.
168. The Mayor's SPG sets out the intended strategic approach to delivering new and enhanced play space both on and off-site in new developments. It explains that 'doorstep' play (Under 5s) should usually be provided on-site, unless there is existing provision within 100 metres. For 5-11 year olds and children over 12 years old, it recommends that off-site provision is acceptable, if there is existing provision within 100-400 metres and 400-800 metres respectively. This is summarised in Table 4.5 of the SPG, reproduced below.

Table 4.5 of the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG

Table 4.5 Provision of play space to meet the needs of new development

		Under 5s	5-11	12+
Existing provision	within 100 m	On site or off-site contribution	Off-site contribution	Off-site contribution
	within 100-400m	On-site	On site or off-site contribution	On site or off-site contribution
	within 400-800m	On-site	On-site	On-site or off-site contribution
No existing provision	within 100 m	On-site	Off-site provision	Off-site provision
	within 100-400m	On-site	On-site	On site or off-site provision
	within 400-800m	On-site	On-site	On-site

169. The financial contributions required in line with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015) would pay for 'off-site' provision, directly funding new and enhanced play equipment close to the site as part of a strategic approach. In this instance, they would go towards new or existing park spaces such as Bramcote Park.
170. Using the GLA's latest Population Yield Calculator (v3.2) and assuming Inner London and a PTAL of 2, the scheme generates a total child yield of 111.5, which equates to a total play space requirement of 1,115 sqm. In total 909 sqm of play space is provided on site. Whilst all the under 5 and up to 12 play provision is provided on site, there is a shortfall in 12+ provision of 206 sqm. This would be provided for by way of a financial contribution. The developer has also proposed that the communal room could be used to provide play facilities for older children. The GLA guidance on play provision does note that indoor space can form part of play provision. The indoor space in this instance is however not being counted as part of the overall play space provision, so does not impact the in lieu payment. The in lieu payment would fund play provision on new and existing play spaces within the AAP area.
171. The play space is provided over two areas; the podium courtyard, and on the 7th floor terrace of the 'southern block' within the development. The design would incorporate landscaped and ecological features amongst a variety of play equipment that would be suitable for both children and toddler play. This will also require the submission of detailed planting and screening to mitigate against potential wind conditions as set out in paragraphs 245 and 246 of this report. This is in accordance with the Mayor's SPG. The spaces would be welcoming for children and young people of all ages and abilities, but also for parents and carers as well as any resident of the development. Detailed drawings of the landscape design, including all play provision, will be secured by condition and will be subject to review by planning committee members before being determined.

Children's Play Space Calculations

Table: Proposed areas of dedicated external play

Location	Area of dedicated play space
Courtyard Podium (all residents)	794 sqm

Southern Terrace 7 th floor	115 sqm
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172. The following table summarises the policy requirements for children's play space, against that proposed. It is important to note that the internal community room will facilitate children's play space although this does not count towards the play space provision as it is internal.

Table showing proposed external play space in the development, and shortfall against policy requirements

Dedicated outdoor child play Space. This can be provided in either the communal or public open space but must be provided in addition to that space, rather than as a sub set of that space.	Required play space based on child yield.	Proposed play space	Shortfall
Up to 12 years old	855 sqm (855 sqm required)	Play space proposed for children up to 12 years old within the podium, the southern terrace and the community room.	No 12+ play space provided resulting in a shortfall of 260 sqm within the development £151 per sqm
Over 12	54sqm (260 sqm required)		206 x 151 = Financial contribution of £31,106.00

173. In accordance with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD, any shortfall in the required amount of child play space will be charged at £151 per square metre. £151 per square metre is an average cost in Southwark for improving play space. Whilst it is acknowledged that there is adequate play space for children up to 11 years old, as there is no provision for 12+ play there would be an overall shortfall in children's' playspace of 260 sqm, which would generate a financial contribution of £39,260 in line the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015).

Public open space

174. The Old Kent Road Area Action Plan identifies within its masterplans which sites will contribute land to new public open space and which will not. Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open space per proposed home. Any shortfall will be charged at £205 per square metre. As set out in the Section 106 and CIL SPD, £205 per sqm represents the average cost for improving open space in Southwark. Sites that aren't providing land for public open space as required in the AAP, will still therefore make contributions to public space provision in the wider plan area through this charging mechanism.
175. The strip of land that faces Ilderton Road, the eastern end of Rollins Street, and along Sharratt Street, is areas where public realm improvements will total circa 274 sqm. These improvements, including tree planting and the widening of the pavement don't count towards the provision of public open space, as the SPD excludes pavements. The Public Open Space offering within the scheme is the area on the corner of Ilderton Road and Rollins Street nearby to the entrance into the 'tower block', which comprises of 144 sqm.

Public Open Space Calculation

Table: Public open space proposed

Public Open Space	Draft OKR AAP (2017) requirement AAP 10: Parks, streets, open spaces –The Greener Belt. (Page 46) and sub area masterplan page 129.	Proposed public open space	Shortfall
	Provide 5sqm of public open space per dwelling. If the site is not identified as providing public open space on site, a financial contribution will be required. 1270 sqm required	144 sqm of public open space within the development	1126 sqm shortfall

176. As demonstrated in the table above, there would be an overall shortfall in public open space of 1126 sqm, which would generate a financial contribution of £230,830.00. The payment of the financial contribution, which would be secured through the Section 106 Legal Agreement. The money would go towards new or existing park spaces including the nearby Bramcote Park.

Overall contribution to private, communal, play and public space

177. The table below demonstrates the overall provision of Children's Play Space, Communal Amenity, Private Amenity, and Public Open Space:

Table: Space provision

	Playspace	Communal Amenity	Private Amenity	Public Open Space
Required	1,115 sqm	50 sqm +453 sqm	2540 sqm	1270 sqm
Proposed	909 sqm	503 sqm	2087 sqm	144 sqm
Shortfall	-206 sqm	0	-453 sqm is provided in communal amenity	-1126 sqm

The total contribution to new and existing public and play spaces £230,830 +£31,106 is £261,936.

Sunlight amenity analysis within the proposed development

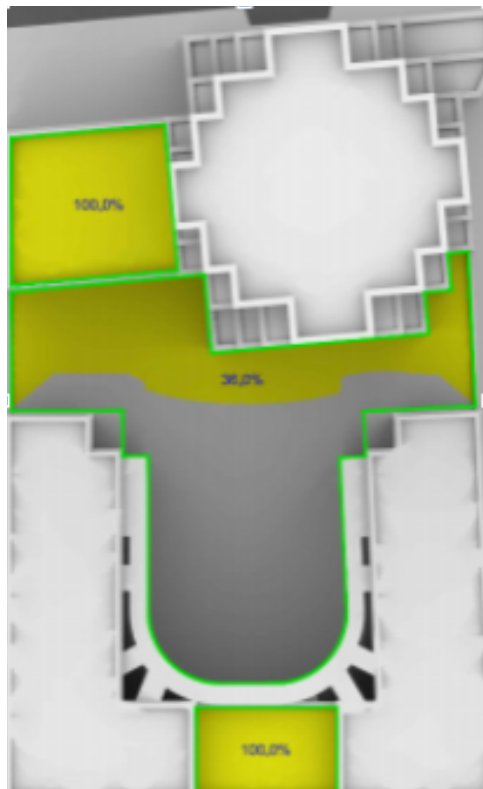
178. Section 11 of the Daylight and Sunlight Assessment demonstrates the amount of daylight that will be facilitated to the three areas of amenity within the development; the central podium, and the 7th floor amenity areas in each respective building. The analysis provides a demonstration of how much natural sunlight will penetrate the proposed amenity areas on March 21st. The results show that the two terraces located on the 7th floor of each respective building will both be able to receive 2 hours of direct sunlight on March the 21st. Regarding the central podium, 36% of the 943.90 sqm would receive 2 hours of direct sunlight on March the 21st. The table below demonstrates the results of the analysis.

Amenity Space	Area (sqm)	Proportion of Area receiving 2 hours sunlight on 21 March
Podium Courtyard	1083	36% (390 sqm)
Ecology Terrace	224	100% (224 sqm)
Southern Block Amenity Terrace	115	100% (115 sqm)
Total	1,422	51% (729 sqm)

179. For an amenity area to be considered well sunlit throughout the year, the BRE guide suggests that at least 50% of the space should enjoy at least two hours of direct sunlight on March 21st. Whilst it is acknowledged that the podium space receives

direct sunlight on March 21st is below the recommended 50%, overall sunlight amenity within the proposal is sufficient with over 50% of the entire amenity space provided within the development facilitating at least two hours of sunshine on March 21st.

Image: Sunlight amenity analysis for March 21st



Conclusion on Outdoor Amenity Space, Play Space and Public Open Space

180. In conclusion, given the density and site coverage of the scheme under consideration, Officers are satisfied with the quality and quantity of outdoor amenity space, play space and public open space proposed. The site is not identified as providing public open space in the AAP masterplan and the agreed financial contributions would directly fund new and existing public open space including at Bramcote Park. There is some shortfall in older children's space and this will be met by off site contributions. Where amenity space is proposed on site, it is well planned, with efficient layouts that do not restrict movement or circulation. The landscape proposals are well thought through and of high quality, which is a positive aspect of the scheme. To ensure the spaces delivered are of the highest quality, detailed landscape design will be secured by condition.

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

181. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not

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

Impact of the proposed uses

182. The retention of the existing B8 Use and the introduction of B1c Affordable workspace within the ground floor and intermediate floor level are compatible with the predominantly industrial character of the surrounding area. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, and accordingly are all found to be acceptable uses.

Daylight and sunlight impacts

183. The following section of this report details the potential daylight, sunlight, and overshadowing impacts of the proposed development on surrounding residential properties. This analysis is based on guidance published by the Building Research Establishment (BRE). As required by Regulations, the submitted assessment has been undertaken by competent, experienced, registered professionals.

BRE Daylight Tests

184. Guidance relating to developments and their potential effects on daylight, sunlight, and overshadowing is given within the 'Building Research Establishment (BRE) Report 209 Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 2nd Edition (2011)' (BRE, 2011) and also in 'Lighting for Buildings Code of practice for daylighting (AMD 7391) BS 8206-2:1992' (BSI, 2008). The Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight, a guide to good practice (1) gives criteria and methods that are explained subsequently for calculating DSO effects on surrounding receptors as a result of the proposed development.
185. While the BRE benchmarks are widely used, these criteria should not be seen as an instrument of planning policy. As stated in the Introduction to the BRE Guidelines paragraph 1.6:
- “The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.”
186. The BRE guidelines provide two principal measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component (VSC) and No-Sky Line (NSL). They also detail a third measure of daylight which is primarily used for assessing amenity within proposed accommodation, namely Average Daylight Factor (ADF).
187. The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. 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 also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or

less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.

188. NSL is a measure of the distribution of daylight within a room. It maps out the region within a room where light can penetrate directly from the sky, and therefore accounts for the size of and number of windows by simple geometry. The BRE suggests that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. the proportional reduction in area should not be greater than 20%).
189. ADF is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. This equates to the ratio of the average illuminance across the working plane, to the illuminance due to an unobstructed sky. In addition to accounting for external obstructions, the ADF accounts for the number of windows and their size in relation to the size of the room, the window transmittance and the reflectance of the internal walls, floor and ceiling. The ADF is detailed in both British Standard 8206 Part 2:2008 and Appendix C of the BRE Report. Both these documents provide guidance for acceptable ADF values in the presence of supplementary electric lighting, depending on the room use. These are 1.0% for a bedroom, 1.5% for a living room and 2.0% for a kitchen.

BRE Sunlight Tests

190. In relation to sunlight, the BRE recommends that the Annual Probable Sunlight Hours (APSH) received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%). The BRE guidelines state that '...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun'. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room based figures.

Overshadowing

191. Section 3.3 of the BRE guidelines describes the method of assessment of the availability of sunlight within garden/amenity spaces. This relates to the proportion of shading on March 21st. The BRE criteria for gardens or amenity areas are as follows, 'It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least two hours of sunlight on 21 March. If as a result of a new development an existing garden or amenity space does not meet the above, and the area which can receive two hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of amenity is likely to be noticeable.'
192. Given the predominantly industrial character of Ilderton Road, there are not too many neighbouring buildings that are in residential use. The daylight and sunlight impacts for the following buildings in residential use and therefore of high sensitivity to impacts are:

- 1-16 Penshurst House
- 180 Ilderton Road;

Adjacent to the application site is the approved development at 180 Ilderton Road that is currently under construction. The submitted assessment takes into consideration the residential units within the planning consented scheme (17/AP/4546). To the immediate south of Penshurst House lies Otford House; however, as no windows in the building face towards the development site and therefore not included in the assessment. This is also the case with the terraced row of dwellings to the northeast of the site nos. 213-225 Ilderton Road.

Image: Plan demonstrating potentially affected neighbours located near to the application site



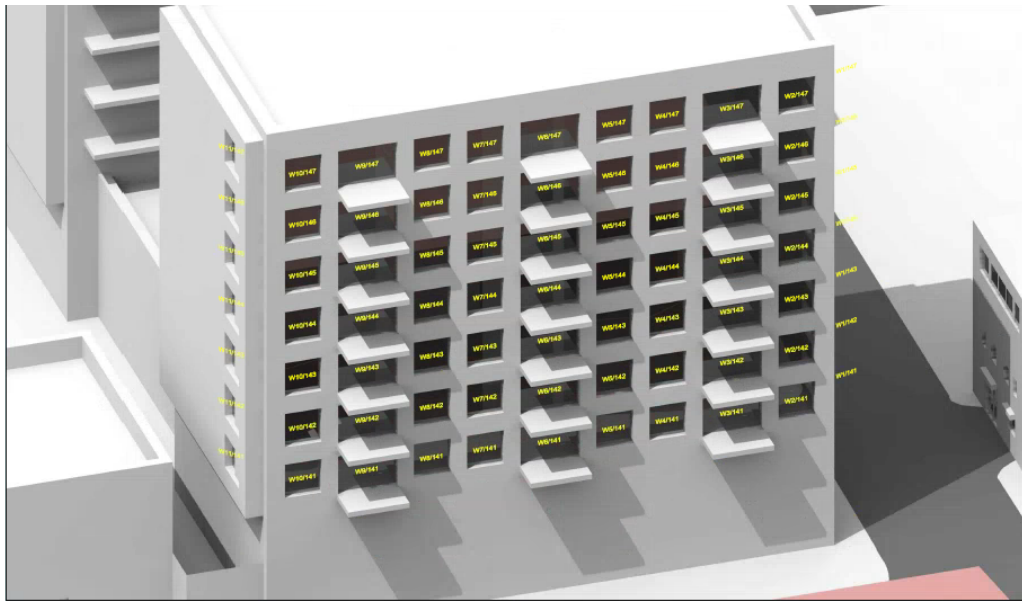
Daylight and sunlight impacts

1-16 Penshurst House

193. The properties are in residential use and located to the east of the site on the opposite side of the Railway line. Each dwelling has windows serving habitable spaces that face the proposal and have therefore been included within the assessment.
194. These dwellings in this building receive extremely good levels of daylight in the existing situation, and therefore the redevelopment of the site results in proportional reductions in both VSC and NSL that are in excess of default BRE guidance. However, while proportional reductions in VSC at the windows serving the flats are generally in the region of 0.7 to 0.6 (30% to 40%), retained VSC values to all the primary windows at ground floor level (windows W4/10, W8/10, W12/10, W15/10, W18/10, W21/10, W26/10 and W29/10) are all upwards of 22%. This represents a very good level of daylight for an urban location. Naturally the upper levels within the property will retain higher levels of daylight, with windows at 3rd floor retaining VSC values of up to 27% (the default BRE target). It is therefore considered that after the proposed development is completed the daylight amenity to these flats will remain good.

very good levels of sunlight will reach 180 Ilderton Road after the application site is developed. All windows would receive the BRE target of 25% of total APSH with at least 5% in winter. This is a good result, particularly as the windows face almost directly due east. As would be expected, ASPH values with the balcony effects included are lower. However, considered in tandem, the analyses demonstrate that the rooms receiving lower levels of sunlight do so due to the presence of the balconies above the windows rather than overdevelopment of the site.

Image: 'affected windows' on the front elevation of no 180 Ilderton Road



Daylight and sunlight conclusions:

201. Whilst it is acknowledged that there will be reductions in daylight and sunlight to the neighbouring properties, retained levels of amenity to both the existing residential properties neighbouring the site, and also the planning consented scheme at 180 Ilderton Road, will remain good after development. The analysis undertaken within the submitted daylight and sunlight assessment demonstrate that the development and its impact on nearby properties compare favourably with appropriate urban daylight levels.
202. Regarding the transient shadowing and the existing shadows cast by the properties surrounding the site. The shadow path of the 'tower block' is fleeting and still enables neighbouring properties to achieve at least two hours of direct daylight and sunlight on March 21st. In terms of the shadow path cast on June 21st, there will be little impact to neighbouring properties or to the immediate vicinity surrounding the site.

Overlooking of Neighbouring Properties

203. The two closest occupiers to the application site are the residential units contained within nos. 1-16 Penshurst House, located to the rear of the site beyond the Railway Line in the London Borough of Lewisham. The other residential property is the development that is yet to be completed adjacent to the application site at 180 Ilderton Road. Penshurst House forms part of the Winslade Estate that comprises of four residential estate blocks; however, only

Penshurst House has windows facing towards the development and is therefore most at risk of the properties within the Winslade Estate. Regarding the impact to the occupiers of the units within Penshurst House, this is limited given that the distance between the rear of the '*tower block*' building in the development and the rear building line of Penshurst House is circa 48 metres, and the distance from the rear of the '*southern block*' is approximately 44.50 metres. The distance between the front elevation of 180 Ilderton Road and the '*tower block*' building of the development is 19.60 metres. Given the sufficient distances between the development and closest occupiers, the scheme is unlikely to result in harmful overlooking to neighbouring occupiers.

Transport considerations

204. Saved Policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards.
205. Southwark have recently adopted the Movement Plan, a people, place and experience approach to transport planning rather than modal one. This application has been assessed on how it will contribute to the 9 Missions.
206. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
 - Vision Zero
 - Healthy Streets
 - Air Quality
207. The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.
208. Officers have reviewed this application and identified the following areas for detailed comments:
 - Access and Road Safety – The safe movement of all modes entering and exiting the public highway
 - Trip Generation –The existing and proposed trips related to the site
 - Servicing and Delivery – How the development will manage the vehicular trips required
 - Car Parking - How the development will manage the vehicular trips required
 - Public Transport – Current access and future potential

Active Transport – Walking and cycling and behaviour change

Existing Site Layout

209. The site is located along the eastern side of Ilderton Road. The site is bound to the north by Rollins Street and to the south by Sharratt Road and to the west by Ilderton Road. Rollins Street is a 300m long cul-de-sac, which provides a

pedestrian/cycle access only from its terminus to the residential area to the east. Sharratt Road provides access to housing estates and therefore not suitable for heavy trips. There is a bus stop located directly opposite the site. The kerbside is currently not controlled and utilised by various businesses to park vehicles which are often uninsured. This does not contribute to a pedestrian friendly environment. Due to the proximity of Millwall Stadium on match days there are a lot of extra vehicle movements in the area. The rear of the site is bounded by the railway line.

Proposed Site Layout

210. The proposed future site layout will improve the pedestrian movement by wider footways. The proposed access arrangements and loading bay will be detailed up as part of the S278 agreement. The council programme for CPZ includes this area and subject to consultation will be implemented within the next two years. The council is also introducing improved cycle routes from Rotherhithe to Peckham and this proposal does not impede that project. The traffic management related to site should focus ensuring a one way movement through the site returning vehicles onto Ilderton Road as neither Sharratt nor Rollins are suitable.
211. The proposal included tracking of a variety of vehicles sizes to ensure the movement can be made. There is sufficient space on Rollins and Sharratt to consider the proposed loading bays which will be detailed within the S278 process. The proposed new loading bay will be sited to ensure the P12 bus route will not be impeded. All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance. A Condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.

Trip Generation

212. The existing site generates some 170 two-way vehicle trips across the day. Mostly freight vehicles related to the business. As part of a review of the trip data post GLA stage 2 further information related to future use was provided taking the position of a worst case scenario. In the case of the B8 warehousing, estimates of 64 two-way movements per day, all via the dedicated loading yard, which can accommodate 5 sprinter vans, 1 car or 2-3 motorcycles, plus up to 3 HGVs at a time. The assumption of 11 hours activity per day could generate a total of 419 two-way trips across all vehicle type per week, - 35 vehicles equate to only some 3 vehicles per hour on average, which can be accommodated by the proposed loading yard.
213. In the case of the B1c uses estimates of 234 two-way trips per week with hours of operation likely to be between 07:00 – 18:00 5 days a week. This equates to some 47 two-way trips per weekday or 23 vehicles across an 8-hour delivery day. The residential use would generate some 10 two-way trips per day across all vehicle types or 5 vehicles. Spread across the day, this is less than one vehicle per two hours.
214. The proposed development is estimated to generate (a worst case scenario) following daily trips:

	Motorised Vehicular Trips
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	<i>Residential motorised vehicle trips</i>	10
	<i>Non residential</i>	87

Servicing and Delivery

215. The proposal includes provision of off street servicing from Ilderton Road. The council will also consider an additional loading bay on Ilderton Road, the exact location of which will be agreed within the S278 agreement. The refuse collection will take place from Ilderton Road, and the bin stores are located within 10 metres of the kerb.
216. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:
- i. Necessary to make the development acceptable in planning terms;
 - ii. Directly related to the development; and
 - iii. Fairly and reasonably related in scale and kind to the development
217. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £25,900.00 based on the 254 residential units and 2,538sqm of non-residential floor space. The applicant has agreed to the contribution which can be collected via the legal agreement.

Type	Quantum	Bond Amount
Residential	254	£25,400.00
Non Residential	2,538 sqm	£500.00
Daily Trips	35	£25,900.00

218. All uses in the development will be subject to a condition on the marketing and promotional material related to the work to ensure this is explicit in how the development has been designed to discourage private cars and encourage sustainable living, working and visiting.

Car parking

219. The site is not located in a designated Controlled Parking Zone and there are sections of unrestricted on-street parking available in the immediate vicinity of the site. However, the area around the junction is restricted by yellow lines that

prevent parking from 0800-1830 Monday to Saturday.

220. The proposed development will be car-free and no general car parking will be provided. There will; however, be two on-site parking spaces for Blue Badge holders (space has been safeguarded for up to 7 disabled parking bays) as well as a loading bay located to the north of the site which will be accessed via a new footway crossover from Ilderton Road. Swept path analysis has been provided to demonstrate a 10 metre manoeuvring to enable exiting onto the public highway in forward gear. A S106 obligation that prevents future residents or occupiers of the proposed development from obtaining resident parking permits for any future CPZ. Furthermore, a condition to ensure all marketing of the development promotes car free living, to ensure the occupants are well aware they will not be entitled to permits.

Public transport

221. The site has convenient access to the P12 Bus Route which is a single decker bus linking Canada Water to Peckham via the Old Kent Road. The bus stops on both Ilderton Road and Old Kent Road which is understood to have capacity for approximately 60 passengers (including standing capacity) during morning and evening peak (Information obtained from the TA acquired summer 2018).
222. Southwark Council agrees with TfL that bus services will need to be increased in the area ahead of the BLE to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area. This is required in advance of the opening of the planned BLE which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. The requirement for TfL to provide evidence to prove both previous contributions has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. A contribution for this site has been agreed as £2,700 per residential unit to be secured in the S106 Agreement. It is also noted that within the next ten years the area is likely to benefit from the Bakerloo Line Extension, and the application site will be within walking distance of both planned Tube Stations, as well as the proposed New Bermondsey Station.

Active transport

Walking and public realm

223. The Transport Assessment includes an active travel zone assessment which was conducted on December 3rd 2019. The application provides for wider footways, and this will be delivered through the S278 Agreement. Further to this, the wider footways will enable a strong active frontage along Ilderton Road. The subject site is within close distance of the proposed linear park and the Bonamy Liveable neighbourhood.

Cycling

224. The site is located close to Quietway 1, and is proposed to be on the new Rotherhithe to Peckham cycle route. The development will provide cycle parking in line with draft London Plan standards acknowledged by the GLA at the stage 1 review. The cycle parking is located in secure rooms on the ground, intermediate, and first floor levels adjacent to each core. Upper level stores are accessed via lifts within the residential core that can accommodate cycles.

225. There are 453 spaces provided in total across a combination of Sheffield Stands (50%), two tier stacked cycle racks (31%) and Brompton style bicycle lockers (19%). Workspace Cycle Storage for the workspace has been calculated based on predicted occupancy levels for the two spaces. The S106 Agreement will include a contribution towards the delivery of a new Cycle Hire Docking Station of £50 per residential unit. In addition to this, a condition is attached to the decision regarding a detailed design of the cycle provision.

Construction

226. A Draft Construction Traffic Management Plan has been prepared as a standalone document submitted along with this application. The S106 Agreement would secure a detailed Construction and Environmental Management Plan (CEMP) and a £40 per unit contribution for Construction Management within the OKR AAP area. This is to enable the council to manage cumulative impacts on the highways and environment.

Conclusion on Transport

The proposal is supported as it will reduce car dependency which will contribute to the efforts against climate change and to the delivery of some of the Movement Plans 9 missions. In particular, these include Vision Zero and Healthy Streets, and allows for the emerging plans for the surrounding public highway to be facilitated subject to the adherence to the S106 obligations and planning conditions mentioned in this section of the report.

Achaeology

227. The proposed development site is located within the 'Bermondsey Lake' Archaeological Priority Zone which is designed to protect the palaeoecological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large late glacial Bermondsey Lake and the associated riverine geology and topology. Saved Policy 3.19 of the Southwark Plan (2007) requires that applications for development in APZs should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report.
228. Southwark's Senior Planner Archaeologist was previously consulted on the impact of this scheme on any archaeological remains. During this consultation it was advised that as the site has already been subject to an evaluation and no further safeguards were applied (before the Leathams Larder building was constructed), it is illogical to ask for any further archaeological assessment work or conditions to be applied to this scheme if a clear evidence base to justify this can be provided. It was also advised that there may still be impacts on archaeological assets from ground interventions for the development scheme which may require a watching brief by condition.
229. The submitted archaeological assessment and its appendices are sufficient evidence to make an informed decision. The 1994 evaluation report evidenced the survival of natural and inundation horizons with no evidence for settlement in situ, these were sealed by 19th century material. The report has demonstrated that no further archaeological measures are required and a watching brief is not required in this instance.
230. The reason for this deviation from policy is that current good practice advice for

the historic environment emphasises that the information required in support of applications for planning permission should be no more than is necessary to reach an informed decision, and that there is a duty on decision makers to ensure that activities to conserve or investigate the asset need to be proportionate to the significance of the heritage assets affected and the impact on that significance. The reasons for this are complex, and every site is assessed on its own individual merits, in this instance there is compelling evidence that no further archaeological work is required for this proposed development.

Aviation

231. The National Air Traffic Safeguarding Office (NATS) have reviewed the proposed development and from a technical safeguarding aspect and have stated that it does not conflict with their safeguarding criteria. Accordingly, they have no objections to the proposal.

TV and radio signals

232. Arqiva own and operate the UK Terrestrial Television Broadcast network and supply the Freeview platform. They also own and operate 90% of the UK Radio Broadcast network, through which they broadcast the full range of BBC and commercial radio stations. In addition, many sites that they own or manage are shared by other operators, such as BT, the Mobile Network Operators, Airwave (Emergency Services Networks), roadside services and Central and Local Government departments and agencies.
233. Following a reply to a consultation letter from LBS, Arqiva have determined that the proposed development will not impact upon their radio transmission and broadcasting links and therefore raise no objection to the development.

Environmental considerations

Wind and Microclimate

234. A wind microclimate report has been produced two proposed configurations (2 and 3) within the analysis that assesses the likely wind and microclimate impacts of the development. The breakdown of configurations within the report is as follows:
- Configuration 1 – Existing site with existing buildings
 - Configuration 2 – Proposed development with existing buildings
 - Configuration 3 – Proposed development with cumulative buildings (Other OKR 16 developments once completed)
235. The methodology undertaken for this assessment comes from the Beaufort Wind Scale. As part of the assessment, a comfort criterion has been developed to analyse pedestrian wind comfort in potential wind tunnelling areas. The criteria used for this is the Lawson Criteria. This is based on the percentage of time that the windspeed at a location exceeds the Beaufort values shown in the table below. The Lawson Criteria allow the wind conditions to be assessed as 'unacceptable', 'tolerable' or 'acceptable' for a given activity where these terms are defined as:
- Unacceptable – unpleasant conditions for the activity which should not

- normally be allowed to occur
- Tolerable – conditions which might be described as windy, but which are tolerated for the activity
 - Acceptable – conditions that would not elicit no adverse comments about the wind

Table: Beaufort wind force scale

Type of Winds	Beaufort Number	Mean Wind Speed (m/s)	Effects
Calm	0	Less than 0.3	Negligible
Calm, light air	1	0.3 - 1.6	No noticeable wind
Light breeze	2	1.6 - 3.4	Wind felt on face
Gentle breeze	3	3.4 – 5.5	Hair is disturbed, clothing flaps, newspapers difficult to read
Moderate breeze	4	5.5 – 8.0	Raises dust, dry soil and loose paper, hair disarranged
Fresh breeze	5	8.0 – 10.8	Force of wind felt on body, danger of stumbling
Strong breeze	6	10.8 – 13.9	Umbrellas used with difficulty, hair blown straight, difficult to walk steadily, wind noise on ears unpleasant
Near gale	7	13.9 – 17.2	Inconvenience felt when walking
Gale	8	17.2 – 20.8	Generally impedes progress, difficulty balancing in gusts
Strong gale	9	Greater than 20.8	People blown over

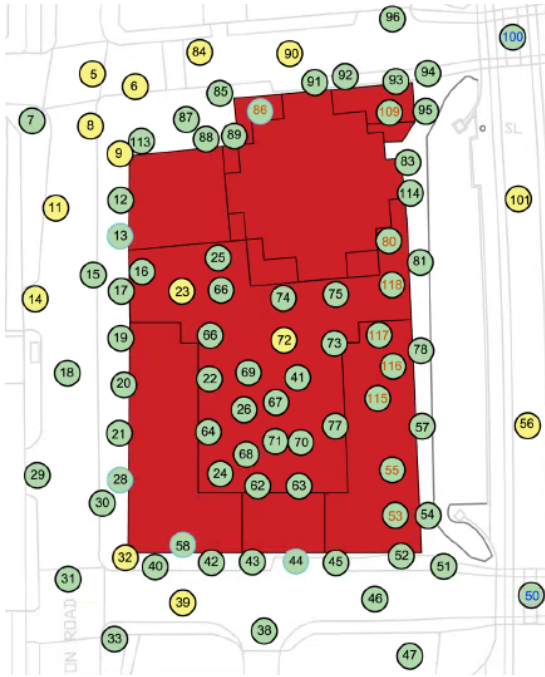
Table: Beaufort Comfort Criteria

Activity	Lawson Comfort Criteria		
	Acceptable	Tolerable	Unacceptable
Business walking (fast walking from point A to B)	1-8	9	10-12
Workers around buildings (maintenance and deliveries)	1-6	7-8	9-12
Strolling (slow walking with occasional stops)	1-5	6-7	8-12

Long-term sitting (parks, cafes, open air)	1-3	4-5	6-12
Entrance doors (specifically for entrances to buildings)	1-2	3-5	6-12

236. The assessment of Configuration 1 demonstrates that the wind conditions around the existing site are suitable for all pedestrian activities during the winter and summer months. In addition, assessments of road safety within all configurations found that no locations on roads surrounding the development site where wind conditions exceed the road safety vehicle criterion adopted by BRE.
237. The results of Configuration 2 indicate that all entrances to the development would have wind conditions suitable for their intended usage during the winter and summer months. Pedestrian activity including strolling and other strenuous activities were found to be suitable during the winter and summer months as well. At the proposed podium and terraces levels for pedestrian activities and strolling was found to be suitable in summer time for all locations, and suitable in winter time in all but two locations. At the podium level the two areas of concern (nos. 23 and 72 in image below) have been identified near to the flank wall of the *'tower block'* where it abuts with the podium. These windier conditions may be caused by a windward vortex generated by the height of the *'tower block'* next to the podium, by the acceleration of the wind around the corners of the *'tower block'* and/or through the passageway between the two smaller blocks.
238. The suitability of the wind conditions will ultimately depend on what activities are proposed for this location within the podium. If the areas in question are to be used for pedestrian strolling then the usage will be suitable. However, if long term sitting is proposed at these locations then the wind conditions would not be suitable for the intended usage and mitigation measures would need to be required. This is a key consideration for the applicant to adhere to when submitting a detailed landscaping and general details of the podium space as part of an overall condition as a result of this permission.

Image: Wind locations within configuration 2



239. Regarding Configuration 3 the results of the analysis indicate similar results at podium level with configuration 2 with the only impacted area being location 23. Similarly with the previous analysis of configuration 2, the wind conditions ultimately depend on what activities are proposed for this location within the terrace area. If long term sitting is proposed at these locations then the wind conditions would not be suitable for the intended usage and mitigation measures would need to be required. Regarding door entrances within this configuration, landscaping should be provided as a mitigation at entrance 13 in the submission of the landscape plan for the overall development which is conditioned as part of this approval.

Image: Wind locations within configuration 3

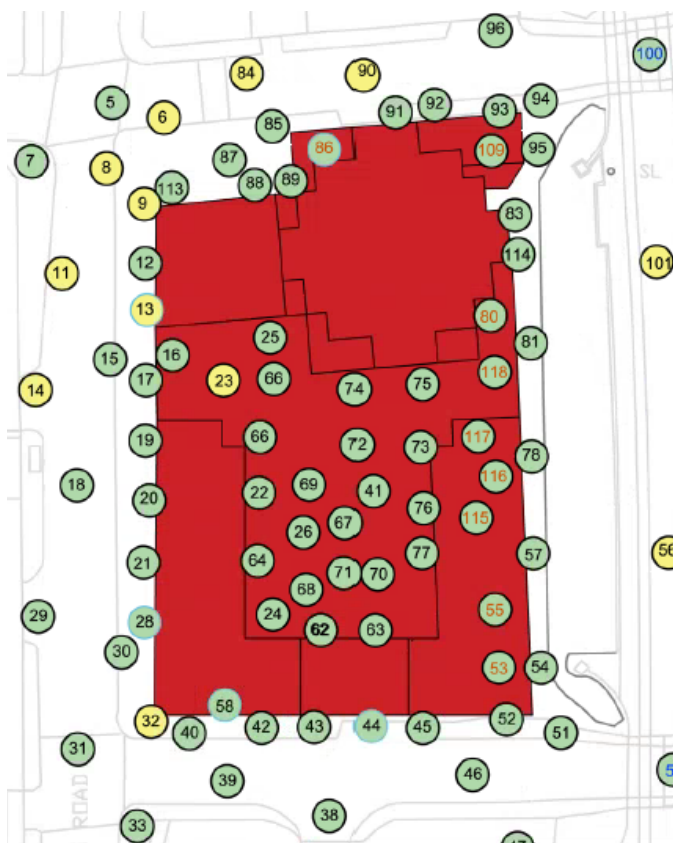


Image: Entrance locations within configuration 3

240. Overall, the wind and microclimate around and within the proposed development is considered to be suitable for the intended usage. The areas where wind conditions can cause some concern will be appropriately mitigated through suitable landscaping.

Flood risk and water resources

241. The application site is located within Flood Zone 3 of the River Thames which is tidally influenced at this location, although in an area shown to be benefiting from existing flood defences. Flood Zone 3 is classified as comprising land assessed as having a 1 in 100 or greater annual probability of river flooding ($>1\%$) or a 1 in 200 or greater annual probability of tidal flooding ($>0.5\%$). Flood defences are indicated to be in good condition and afford the Site a standard of protection up to the 1 in 1000 year event.
242. The Environment Agency (EA) has reviewed the submitted information in relation to flood risk and has no objection to the proposed development. On the advice of the EA, recommendations attached to this decision should include conditions relating to Piling and a Surface Water Drainage Strategy. Regarding piling, given the height of the proposed structure, it is assumed that the existing foundations would not be substantial enough therefore a piling process is required.
243. The council's Flood and Drainage Officers have also reviewed the submitted proposals, and are encouraged to see proposals for limiting surface water discharges to greenfield runoff rates. Southwark Flood Risk Officers generally accept discharge rates of no greater than 2 l/s. The Drainage Addendum

submitted in December 2019 demonstrates that the development is able to achieve a greenfield rate of 1.8 l/s through a combination of permeable paving storage and geo cellular storage. Given the evidence submitted with the Drainage Addendum, Southwark Flood Risk Officers raise no objection to the development.

Ground conditions and contamination

244. The environmental assessment has identified numerous potential sources of contamination associated with Made Ground on site and the current / historical industrial land uses nearby. In the context of a proposed residential development, the site is considered to represent a moderate to low risk to identify human health receptors and a moderate risk to controlled waters receptors.
245. The council's Environmental Protection Team have reviewed the preliminary risk assessment and accordingly recommended the attachment of a condition to require a phase 2 site investigation and risk assessment is undertaken. This investigation should include a detailed remediation and/or mitigation strategy to be prepared and submitted. This condition has been included on the draft decision notice.
246. The Environment Agency have reviewed the proposals in relation to contaminated land and made the following recommendation.
247. "We have reviewed the document 'Preliminary Geo-Environmental Risk Assessment' (PRA) by BWB Consulting. The document recommends an intrusive investigation in order to assess the potential for ground contamination to be present. It should be considered that planning permission should only be granted to the proposed development as submitted if the appropriate planning conditions are attached to the approval.
248. The recommended conditions are included in the draft decision notice.

Air quality

249. The subject site is located in the Southwark Air Quality Management Area which is designated for the potential exceedance of the annual mean nitrogen dioxide (NO₂) and daily mean PM₁₀ air quality objectives. Southwark Plan Policy 3.6, Air Quality, states that planning permission will not be granted for development that would "lead to a reduction in air quality." London Plan (2016) Policy 7.14 states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality.
250. A qualitative construction phase dust assessment was undertaken in accordance with Institute of Air Quality Management and Greater London Authority guidance and measures were recommended for inclusion in a Dust Management Plan to minimise emissions during construction activities. With the implementation of these mitigation measures the impact of construction phase dust emissions was considered to be 'not significant' in accordance with Institute of Air Quality Management and Greater London Authority guidance.
251. A detailed road traffic emissions assessment was undertaken to predict concentrations of NO₂ and particulate matter (PM₁₀ and PM_{2.5}) across the proposed development, and the suitability of the Site for the proposed residential use was considered with regard to air quality. Road traffic emissions were

modelled using the dispersion model ADMS-Roads and the modelling assessment was undertaken in accordance with Defra Local Air Quality Management Technical Guidance and Institute of Air Quality Management & Environmental Protection UK guidance. Pollutant concentrations were predicted to be below the relevant air quality objectives and the Site was therefore considered suitable for the proposed use. Utilising the Air Pollution Exposure Criteria published by the London Councils, the Site was considered to fall into criteria A where there are considered to be no grounds for refusal. Finally, an Air Quality Neutral Assessment was undertaken to compare building emissions from the proposed development with GLA benchmarks. NO_x emissions from the proposed

development's energy centre were assessed to be below the benchmarked threshold.

252. The council's Environmental Protection Team was consulted on the air quality report submitted and agrees with the conclusions presented in the Air Quality Assessment by BWB Consulting, ref. MCP2141-001, April 2019. Officers recommend that a condition regarding details of a scheme for the internal ventilation of the development including appropriately located plant, inlets and outlets; filtration and treatment of incoming air. This condition is attached to the draft decision notice.

Noise and vibration

253. An environmental noise survey and noise impact assessment has been undertaken by BWB Consulting (ref: MCP2141 May 2019). The assessment indicates that with suitable provision for sound insulation measures to habitable rooms, preliminary specifications for which have been outlined in the assessment, the proposed development is acceptable from an acoustic perspective. A recommendation from the report indicates that an acoustician should be appointed during technical design to develop the preliminary guidance outlined within the noise assessment report.

254. The council's Environmental Protection Team has reviewed the submitted report by BWB Consulting. EPT Officers raise no objection to the development subject to a list of conditions that should be attached to the planning permission. EPT Officers advise that with respect to the dwellings hereby permitted within the overall development; these should be designed to ensure that internal noise levels are not exceeded due to environmental noise. The required standards are attached as a condition, and Officers advise that standards may be achieved by following the recommendations contained in the Noise Impact Assessment by BWB. Balconies and/or winter gardens shall meet the recommendations given in section 4.17 of this report. Following completion of the development and prior to occupation, a validation test to demonstrate achievement of the above internal noise levels shall be carried out on a sample of 5 premises with a façade facing Ilderton Road. The results shall be submitted to the LPA for approval in writing.

255. The recommended conditions are included in the draft decision notice.

Rapid health impact assessment

256. The development has been assessed against the London Healthy Urban Development Unit's Planning for Rapid Health Impact Assessment (RHIA) Tool: Fourth Edition (October 2019). The RHIA considers the potential health risks and

benefits that would result from the proposed development and consider the ability of local health services to cater for the additional demand created as a result of the development.

257. Of the 51 criteria considered, the proposed development will have a positive impact on 37 and a neutral impact on 14. There are no negative impacts identified. The development is therefore seen to have an overall positive impact on both mental and physical health for residents.

Sustainable development implications

Energy

258. 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. This involves the 'Be Lean', 'Be Clean', 'Be Green' hierarchy. 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. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 35% reduction against part L of the Building Regulations 2010.
259. An Energy Statement and Strategy has been submitted based on the guidance of the National Planning Policy Framework (2019), The London Plan (2016) and Draft London Plan (2017), Southwark Core Strategy (2011), Southwark Sustainable Design and Construction Supplementary Planning Document (2015), and the Mayor's Energy Assessment Guidance.
260. An updated Energy Statement and Strategy was submitted by the applicant following requests by the GLA to provide information on the following:
- SAP Modelling
 - Overheating
 - Notional cooling
 - Air Source Heat Pumps

Be Lean (use less energy)

261. The GLA draft version of the London Plan and the Policy SI2 Minimising greenhouse gas emissions state that residential developments should achieve 10% and non-residential developments should achieve 15% through energy efficiency measure alone. The residential part of the proposed development achieves 15% carbon reduction when compare to the baseline using the SAP 10 data from the GLA carbon emissions reporting spreadsheet version 1.1 tool. The non-domestic unit of the proposed development achieves 4% carbon reduction when compare to the baseline using the SAP 10 data from the GLA carbon emissions reporting spreadsheet version 1.1 tool which do not achieve the 15% carbon reduction as stated in the Draft London Plan.
262. It is anticipated that once connected to the SELCHP district heating network the non-domestic building will achieve significantly greater levels of carbon reduction. Connection to SELCHP would also result in a significantly improved reduction in regulated CO2 emissions of around 76% for the residential uses. The building envelope for the commercial unit already seeks to achieve good levels of

performance with u values significantly greater than the minimum u values detailed within the approved document Part L2A. Elements available for improvement are limited due to the residential building partially covering a significant proportion of the commercial building limiting the opportunity for improvements through the building fabric.

263. The targeted air permeability of 5 m³/hr/m² at 50 Pa represents a significant improvement over the minimum requirements of the approved document Part L2A and resulting in limited opportunities for reducing the target air pressure considerably further. It has therefore not been deemed feasible to increase the performance of the external envelope such that a lower air permeability rate could be employed to improve the carbon reduction performance of the non-domestic building.

Be Clean (supply energy efficiently)

264. When a decentralised Combined Heat and Power (CHP) unit is compared to centralised electricity production and gas boiler heat, the CHP unit delivers energy savings as heat energy that would be returned to the atmosphere is recovered and used as heating. As the grid becomes more efficient, wasting less heat, the comparative emissions savings of a CHP system are reduced. Electricity with lower carbon intensity makes a strong case for the use of a heat pump to provide low energy water heating.
265. Air Source Heat Pumps (ASHP) absorbs heat from the outside air, which can then be used for space heating and domestic hot water. A refrigerant system involving a compressor and a condenser is used to absorb heat from the air and release it into the Low Temperature Hot Water (LTHW) system, the ratio of useful heating provided to work required is known as the coefficient of performance (CoP).

Be Green (Low or Carbon Zero Energy)

266. Photovoltaic Panels (PV) and ASHP's are the green/renewable energy technologies that have been considered as suitable for the proposed scheme. Regarding the commercial aspect of the development the updated strategy the incorporation of U-Values, ASHP's for the office areas, with background heating provided to the storage areas achieves a 21% reduction in regulated CO₂ emissions. To meet the zero carbon target, a carbon off-set payment of £32,580 is to be secured through the S106 Agreement.
267. In terms of residential use, the improved U-Values where feasible within the building fabric and services along with a gas boiler system for heating, and the incorporation of PV panels achieves an 18% reduction in regulated CO₂ emissions. To meet the zero carbon targets, a carbon off-set payment of £443,411 is proposed. This is to be secured through the S106 Agreement. It is important to note that an assessment of the revised carbon offset based upon the development being connected to the SELCHP district heating network requirement was carried out and on the basis of the scheme achieving a 76% carbon reduction the Carbon Offsetting Fund contribution would be reduced from £443,411.00 to £130,259.62.

Overheating

268. Policy 5.9 of the London Plan “Overheating and Cooling” states that major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy. This policy seeks to reduce the impact of the urban heat island effect.
269. The commercial element of the development, currently proposed to serve as warehouse storage facility shall be predominantly heated to provide only background heating with the densely occupied office and ancillary areas being provided with Variable Refrigerant Flow (VRF) heating and cooling where natural ventilation will not be sufficient alone to achieve compliance with the associated overheating requirements of the internal occupied spaces.
270. The residential element will be fed from the communal heating system which distributes from the ground floor heating plantroom located within the ‘tower block’. The communal heating system is the water based LHTW system designed with a Flow and Return temperature of 70 Degrees Celsius Flow and 40 Degrees Celsius. Horizontal internal LHTW pipework runs have been minimised where possible in order to reduce the extent of heating pipework with enclosed corridors and ceiling voids. The LHTW service pipework has been routed to run externally, within external walkways where possible, to reduce heat gain within internal communal corridors and apartments. Finally, the thermal insulation levels in excess of those specified with the London Heat Network manual are proposed, with compliance of BS5422:2009 Annex G met as a minimum.

BREEAM

271. Strategic Policy 13 of the Core Strategy requires commercial units to achieve BREEAM “excellent” and community facilities to achieve “very good”. A BREEAM Pre-assessment has been undertaken for this development with an initial rating of 71.20% considered to be rated as ‘Excellent’.
272. A planning condition is recommended to secure an independently verified BREAAAM report demonstrating that these target ratings would be achieved through the detailed and technical design stages.

Planning obligations (section 106 undertaking or agreement)

273. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 ‘Implementation and delivery’ of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

274. The application would be supported by the following Section 106 obligations:

Table: Section 106 Financial Obligations

Planning Obligation	Mitigation
Archaeology	£0.00
Affordable housing monitoring	£10,058.60 (76 affordable homes x £132.35)
Carbon Offset – Green Fund	A maximum of £475,991 (reduced to £130,259.62 if the development is connected to SELCHP Network.
Delivery and Service Plan bond (Residential)	£25,400 ((254 homes x £100) + The council will retain £1,600.00 for assessing the quarterly monitoring for 2 years
Greenfield run off rates	£0.00 (£366 per cubic metre shortfall against greenfield run off rates)
Contribution to existing and new public space in the AAP area.	Estimated cost: £230,830 open space. £31,106 play space.
Transport for London Buses	£685,800 maximum capped contribution, to be drawn down according to TfL methodology review mechanism) (Maximum £2,700 per residential unit)
Transport for London cycle hire contribution	£12,700 – maybe more if non residential contribution is required (£50 per residential unit plus non residential contribution)
Construction Management Contribution	£10,160 (£40 per residential unit)
Trees	£0.00 This may change if the proposed trees within the red line not be feasible of which payment will be secured

Admin fee	2% for all cash contributions plus flat fee of £2,000 for costs incurred in transferring TfL buses contribution
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275. In addition to the financial contributions set out above, the following other provisions would be secured:

- Affordable housing provisions and delivery controls, including provision for an early stage review;
- Wheelchair accessible housing;
- Marketing, allocation and fit out of the wheelchair units
- Car park/Servicing bay/Site management plan;
- Appointment of workspace co-ordinator;
- Workspace Specification (including full M&E fit out);
- Triggers securing Practical Completion of workspace;
- 10% Affordable workspace – Available for 30 years minimum at £17 per sqft to the end user (subject to annual RPI increases);
- Affordable Workspace Management Plan, including marketing requirements;
- Construction phase jobs, short courses and apprenticeships or Employment and Training Contribution;
- Employment, Skills and Business Support Plan (Construction Phase);
- Skills and Employment Plan (End User Phase);
- Highways works – s278 works;
- Connection to a future district heating system (SELCHP);
- London Living Wage – best endeavours to being offered to all staff employed in the commercial units as well as workers during the construction period;
- Final Demolition and Construction Environment Management Plans;
- Final Delivery and Service Management Plan;
- Final Construction Logistics Management Plan;
- Local Procurement;
- Service charge costs to social rent tenants would be capped within social rent cap levels;
- Securing Maccleanor Lavington Architects to deliver the building detailed design, unless otherwise agreed in writing

276. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.

277. In the event that a satisfactory legal agreement has not been entered into by 15 December 2020, it is recommended that the director of planning refuses 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 (2015) and the Planning Obligations and Community Infrastructure Levy SPD (2015)”.

S278 Works Outline

278. The council's Highway Officers raised initial concerns over the proposed loading bay on Rollins Street. However, as shown on drawing 18050-01, a minimum footway width of 4.3m is achieved behind the proposed loading bay and trees along Rollins Street; this has been achieved by setting back the proposed building line from that currently existing. It is proposed that all paved areas within the redline will be offered for adoption. This will provide a minimum 2.5m pavement width on Ilderton Road and 3m pavement width on Sharratt Street. In light of the above, the initial concern has been overcome.
279. An S278 agreement will need to be undertaken with Southwark Highways for works to the highway, and traffic management changes. Notwithstanding the S278 with Southwark, the applicant is advised that a separate Section 278 Agreement would be required for the development with TfL.

Mayoral and Southwark Community Infrastructure Levy (CIL)

280. 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. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.
281. Based on the existing floor areas provided in the agent's CIL Form dated 23-May-19 and proposed areas in the Area Schedule (May-2019), the gross amount of CIL is approximately £6,807,494.74, consisting £1,435,424.64 of Mayoral CIL and £5,372,070.10 of Borough CIL. If CIL relief procedures have been followed correctly after grant of planning permission, it is expected over £1,661,789.51 of Social Housing Relief might be claimed, of which £312,732.03 of MCIL2 relief and £1,349,057.48 of Borough CIL relief.
282. That is, the anticipated CIL receipt for this scheme is circa £5,145,705.23 net of relief. It should be noted that this is an estimate, and the floor areas will be checked when related CIL Assumption of Liability Form is submitted after planning approval has been obtained.

Other matters

283. None

Conclusion on planning issues

284. The major redevelopment of the site is supported and delivers many of the key aspirations of the AAP. The mix of uses achieved is considered to be exemplary, successfully combining industrial and residential uses in a carefully considered design led approach. The scheme would make a significant contribution to the councils housing and jobs targets in one of the boroughs major regeneration

areas.

285. The re-provision of the existing B8 floor space on the ground floor along with the introduction of B1c Affordable Workspace is considered to be a major benefit of the scheme with the provision of 10% of the employment floor space for Affordable Workspace is welcomed.
286. The proposed mix of uses would add to the vibrancy of the area which would be complemented by public realm improvements to Ilderton Road, Rollins Street and Sharratt Street. There would be an enhanced relationship from the proposed development to the streetscene with active frontages created on the north, west and south sides of the development.
287. The scheme would deliver the following major regeneration benefits:
- 254 new residential units to the borough's housing stock;
 - 35% affordable housing overall (27.8% social rented and 7.7% intermediate)
 - The re-provision of the existing B8 Use Class with the introduction of B1c Affordable Workspace;
 - 76 new full time equivalent jobs would be provided post development;
 - Generous provision of door-step play for younger children along with a large degree of communal amenity for residents to use and enjoy.
 - A contribution to new and existing parks including Bramcote Park, with delivery mechanisms secured through the Section 106;
 - The site will benefit significantly from the planting of trees and landscaping features that are currently not available on site;
 - The introduction of an Ecological Terrace to the '*Tower* block' represents significant ecological gain.
 - The proposed development results in a series of significant economic, social and environmental benefits that outweighs any potential and minor harm to the surrounding area that may be caused
288. The proposals would deliver a high standard of accommodation, which would comply with the majority of the standards and principles of exemplary residential design, as set out in Southwark's residential design standards SPD. Overall 70% of the development would be dual aspect. Given the high density of the scheme this is considered to provide a high level quality of accommodation. Furthermore, all units have access to private amenity as well as communal amenity and play space located on the podium level and the two terrace levels in each respective block.
289. The proposed development would reduce car dependency whilst significantly increasing cycle provision within the development. The increased width of the public footway along Ilderton Road following the removal of existing hoardings is anticipated to significantly enhance the public realm and improve the pedestrian experience through comfort and circulation when entering, visiting or moving past the site.
290. The impacts of the scheme on neighbouring properties in relation to daylight and sunlight would not result in detrimental harm to the living conditions of neighbouring occupiers.
291. The architectural design is considered to be of the highest quality and would

significantly improve the site within the context of the surrounding area.

292. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, referral to the Secretary of State and the agreement of a Section 106 Legal Agreement under the terms as set out above.

Statement of community involvement

293. Consultation was carried out by the applicant prior to the submission of the planning, and during the consideration of the application. The consultation undertaken was carried out with the local community and key stakeholders from the area. This is summarised in the tables below, which are taken from the submitted Development Consultation Charter.

Table: List of meetings

Meetings	Date	Attendees	Summary of discussions
Pre application meetings (Southwark Council)	4 pre-application meetings Pre-application meeting dates: 17/07/2018 05/02/2019 28/02/2019 18/03/2019	Council Officers	<ul style="list-style-type: none"> - Transport planning - Design development - Landscaping - Unit mix - Ground floor use
External pre-application meetings	2 Pre-application meetings Pre-application meetings 28/09/2018 (GLA) 11/03/2019 (DRP)	Design Review Panel Greater London Authority	<ul style="list-style-type: none"> - Design - Energy - Uses within development - Transport

Councillor meetings	17/05/2018 11/12/2018 22/01/2019 05/02/2019 11/03/2019	Cllr J Situ Cllr Richard Livingstone Cllr Evelyn Akoto Cllr Michael Situ Lewisham Cllr Joe Dromey Lewisham Cllr Paul Maslin	All Councillors welcomed the proposals with all supportive of the commercial retention and improvement of the overall area.
Resident group meetings	31/01/2019 21/03/2019	Tustin Estate TRA – Andrew Eke, Chair and approximately 17 Tustin estate residents Winslade Residents Association - 13 people including Bianca Kent (BK) - Chair, Sarah Grindley - Secretary, Denise Missenden, Doreen Beadle, Sue Masson, Cherry Grant, Mdage Naliu, Karunakaran Arun, Jane Robinson, James Henderson, Amy Clement - Housing Officer, Lewisham Homes plus 3 others	Queries were raised by the Tustin TRA about the actual reduction in commercial vehicle movements, the impact of people moving into the development on parking in the area and affordability of the affordable housing. Overall the Winslade Residents were positive with no one attending the meeting raising concerns either about the principle of development or the proposed scale and massing of the scheme.
Meeting with Renewal Group	05/02/2019	John Gallagher, Mark Taylor	Overall feedback was positive with both welcoming Leathams' proposals that they felt augmented Renewal's plans.
Ilderton Primary	06/02/2019	Carol Askins, Sarah Harris	Both were supportive of 'anything that

School			improves the surrounding area'
Meeting with Millwall FC	01/03/2019	Andrew Barrow, Matthew Black	Both voiced their support of the proposal
Argon Capital	11/04/2019	James Gilbert, Tom Sherwood	Both voiced their support of the proposal
Vital OKR	18/04/2019	Mark Brierley, Tim Cutts (Southwark Council)	Mark was constructive in his opinions of the development and raised no objection to the scheme

Table: List of public consultation events carried out

Public consultation events	Date	Attendees	Summary of feedback
Public exhibition 1 – Ilderton Road Primary School	13/03/2019 (4pm-8pm) and 15/03/2019 (10am-2pm)	30 members of the public attended	<p>Attendees were mostly supportive of the principle of a mixed-use development on this site.</p> <p>The points of concern raised during the consultation was in regards to the:</p> <ul style="list-style-type: none"> -Form and arrangement of the buildings - Social infrastructure - Congestion and traffic <p>The tall building strategy in OKR16 states that there is scope for taller buildings on the east side of Ilderton Road.</p> <p>In response to social infrastructure it should be noted that redevelopment of the Ilderton Road site will contribute through section 106 and CIL contributions to improve community infrastructure.</p> <p>Regarding traffic, It should</p>

			<p>be further noted that other than some disabled car parking spaces, the residential element of the scheme will be “car free”. Parking controls in the local area will be reviewed and new residents will not be able to apply for a parking permit. There will also be at least one secure cycle parking space for each residential unit and additional spaces will be provided for the commercial uses and for visitors to the site.</p>
Public exhibition 2 – Ilderton Road Primary School	04/04/2019 (4pm-8pm) and 06/04/2019 (10am-2pm)	18 members of the public attended	<p>The responses from the second public exhibition were again supportive of the proposal. The two areas of concern related to:</p> <ul style="list-style-type: none"> -Traffic and congestion -Retail opportunities <p>The exhibition reaffirmed that the development would be car free and residents will not be able to apply for a parking permit.</p> <p>In regards to retail opportunities within the scheme. Responses to these concerns reiterated that OKR 16 in the OKRAAP seeks to replace existing employment floor space with other industrial and warehouse uses. Retail opportunities are focused within the new Old Kent Road Town Centres.</p>

Consultations

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

Consultation replies

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

Summary of consultation responses

296. This application was subject to a round of statutory consultation in June

297. At the time of writing, a total of three consultation responses had been received from members of the public and local businesses and organisations. Two of the three responses are opposed to the proposed development, the other comment is neutral.

298. The main issue raised by residents objecting to the proposed development are:

- Concern over the impact of the development in the short and long term due to the size of the proposal
- Height of the 28 storey building
- Overshadowing of neighbouring estate
- Negative impact on the character of the area
- Reduced sunlight in the evenings

299. Officer response: The development has been assessed in depth, and the development is not considered to give rise to any detrimental harm to the amenity of neighbouring occupiers as discussed in detail within this report. Additionally, the development, whilst tall, would not harm the character of the surrounding area. See Design section of this report for the positive contribution this development is anticipated to make on the surrounding area.

300. The neutral comment raised during the consultation period was not planning related; rather a member of the public was requesting information of the Design and Access Statement (DAS). The DAS is made public on the council's website and is viewable to all members of the public.

GLA

301. The GLA's Stage 1 response considers the principle of development and proposed land uses to be appropriate and generally in compliance with London Plan policies. The design is also considered acceptable. However, the report also raises a few issues whereby more information was required at the planning application stage. Through the application process, these have been addressed, as set out below.

302. Climate change: Further information relating to SAP, overheating, notional cooling and ASHP is required. Contributions to the borough's offset fund and connection to the SELCHP should be secured.

303. Officer response: The applicant's have submitted further information in regards to the climate change mitigation, and the additional information is considered acceptable in overcoming initial concerns expressed in the GLA response.

304. Transport: Further work on Healthy Streets, the Transport Assessment, Blue Badge parking, servicing and construction is required.

305. Officer Response: The additional transport information submitted throughout the lifespan of the application are deemed acceptable by the council's Transport Officer

TfL

306. Disabled parking: No disabled parking provision is proposed for the residential uses, and therefore the proposal is still contrary to Policy T6. The applicant states a number of options were considered, however at an early state it was agreed with Southwark that residential disabled persons parking could not be safely accommodated within the curtilage of the site. We consider that the potential for disabled persons' parking equivalent to 3% of homes should be identified which does not encroach upon adequate and demonstrated servicing needs nor the safe and efficient operation of bus services, active travel and general traffic or upon the quality and extent of the public realm.
307. Officer Response: During early pre-application discussions, it was agreed that given the density of the site, the provision of disabled parking on site could not be safely accommodated. Further discussion and submission of a Transport Assessment in December 2019 demonstrates that 2 disabled spaces can be facilitated by the dedicated loading yard which frees up space for on street disabled persons' parking.
308. Servicing an Delivery: TfL is unconvinced that the delivery and servicing arrangements proposed are sufficient to accommodate the demand even with four as opposed to two on street bays. In the event that this amount of provision is accepted strong management and control will be expected to be secured to ensure that demand is spread and there is no risk of overspill.
309. Officer Response: The council's Transport Officer is encouraged by the Servicing and Delivery arrangement proposed for the development. Officers have recommended that the applicants enter into a Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor space. The applicant has agreed to the contribution which can be collected via the legal agreement.

London Underground

310. No comments to make on the application.

Metropolitan Police

311. The Designing Out Crime Officer has advised that the development can attain secure by design accreditation. The Met Officer has recommended a condition be attached regarding the need for the development to attain secure by design accreditation.
312. Officer response: The recommended conditions are included with this recommendation.

Natural England

313. No comments to make on the application.

Environment Agency

314. No objection to the development.

Historic England (HE)

315. Historic England raises no objection to the scheme given that the proposed development will be of similar height to the existing Tustin Estate residential towers.

Arqiva

316. Arqiva has considered whether this development is likely to have an adverse effect on our operations and have concluded that the development will not impact on any of our SHF or RBL links.

Thames Water

317. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

318. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

319. The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets; as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

320. Officer response: The recommended informatives have been attached to this decision notice of this application.

UKPN Network

321. UKPN objects to the development due to the existence of a nearby substation owned by UKPN that may be impacted by the development.

322. Officer response: The applicant has been made aware of the objection by UKPN and will engage to mitigate any impact to the substation owned by UKPN.

Network Rail

323. Network rail are concerned by the cumulative impact that this and other proposed developments in the area will have on South Bermondsey Station. No formal objection is made however.

Internal consultees

324. The advice received from other Southwark Officers has been summarised in the table below. Further detail is provided throughout this report.

Officer	Summary of comments	Officer response
Urban Forester	<p>No trees or landscaping of significance to amenity or screening are affected. A number of street trees are proposed together with those at grade, on podiums, terraces and at roof level. A specific tree planting condition is required to ensure these are provided, especially where agreement is needed by highways.</p> <p>Should these or others within the red line not be feasible then payment in lieu can be agreed for provision elsewhere within the vicinity.</p> <p>Also recommended that s106 or CIL funds be identified for investment of the new open space nearby at the junction of Surrey Canal Road. This is due to be adopted by parks</p>	Recommended conditions included. For S106 contributions, Bramcote Park is the area of open space agreed for investment in lieu of any payments needed
Local Economy Team (LET)	Subject to the employment and enterprise obligations outlined in this response, LET are happy to support this application which matches the economic, job, and growth plans as discussed in the planning statement.	Recommended contributions to be secured through the S106
Environmental Protection Team (EPT)	Approve subject to conditions	Recommended conditions included with this report.
Ecology Team	No objection. Recommendations include 10 swift bricks, 10 bat bricks + 6 house sparrow terraces, and green roofs for biodiversity be conditioned	Conditions attached to this report.
Flood Risk and Drainage Team	The submission of the surface drainage strategy demonstrates that the discharge rate is 1.8 l/s which is under the recommended 2 l/s. Flood risk officers therefore have no objection to the development.	N/A
Transport	Approve subject to conditions and	Recommended conditions

	Section 106 clauses.	included with this report, or as clauses in S106.
Highways	No objection subject to a conditions and applicant entering into S278 Agreement	Recommended conditions attached
Design and Conservation	Although it is considered that the proposal will introduce substantial change to the site and its locality, such change can be accommodated when considering cumulative developments set within the scope of the area masterplan. The context of the area is advancing with permitted developments reaching 8 storeys in height. This proposal attains the principles of exemplary design and will positively contribute to the changing landscape of the area. Overall, the developments design sufficiently meets the policy criteria for a new tall building and good urban design, in the creation of a local landmark.	Conditions attached to permission
Archaeology	No further archaeological work is required for this proposed development.	N/A

Community impact statement / Equalities Assessment

325. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act:

- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
- b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
- c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

326. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

327. The council must not act in a way which is incompatible with rights contained

within the European Convention of Human Rights

328. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. This is addressed in detail in the relevant section of this report.

Relevant planning history

329. The subject site has been subject to two planning application of note which are detailed below:

94/00387

'Erection of a two storey warehouse building with associated service yard and car parking'

Decision: Granted

13/AP/0534

'Extension to existing warehouse on south east corner of site along Sharratt Street'

Decision: Granted

Pre Application Advice

330. 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 provision of affordable housing, the height and massing of the proposals, the re-provision of B8 floor space with the insertion of Affordable Work Space in Use Class B1c. Additionally, the amenity space, play space, the quality of the residential accommodation and potential impacts upon surrounding occupiers were discussed during the pre-application stage.

Planning history of adjoining sites

331. The council has received a number of planning applications recently in the Old Kent Road Opportunity Area. These include the following:

332. 18/AP/0564 16 Peckham Park Road and 1 Livesey Place

Application type: FULL

Demolition of existing buildings and construction of a part three, part four storey building with retail and warehouse (A1) use on the ground floor and 5 residential units (3 x 2-bedroom and 2 studio flats) on upper floors.

Decision: Granted with Grampian Condition (3rd August 2018).

333. 17/AP/2773 Malt Street Regeneration Site, Land Bounded By Bianca Road, Latona Road, Haymerle Road, Frensham Street, and Malt Street

Application type: FULL and OUTLINE

Hybrid application comprising a full planning application for Phase 1 (the “Detailed Component”) and outline planning permission (the “Outline Component”) for Phases 2 and 3:

Detailed Component (Phase 1):

Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area for the erection of a total of 4 buildings, two at 7 storeys (Buildings B9 and B12), one at 15 storeys (Building B10), and one at 44 storeys (Building B4) (max height 147.12m AOD) to provide 420 homes, 1,197 sqm GEA of Class B1(c) floorspace and 785 sqm GEA of non-residential floor space within classes A1-A4 (retail), Class B1 (business) and Class D1 (public services) and D2 (entertainment and leisure) use, an energy centre (750 sqm) and new public open space and public realm with on street and basement car parking spaces and cycle spaces.

Outline Component (Phase 2 and 3):

Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and the erection of a seven buildings (B1, B2, B3, B5, B6, B7, B11) ranging in height from 5 to 39 storeys (max height 132.9m AOD) to provide up to 88,052sqm floorspace GEA, comprising up to 880 residential units, up to 3,316 sqm GEA of Class B1(c) floorspace and up to 1,702sqm GEA of non-residential floor space within Classes A1-A4 (retail), Class B1 (business), Class D1 (public services) and D2 (entertainment and leisure) use and car parking spaces at ground level and cycle spaces, with associated new open space, public realm, car parking and associated works.

Totals: Up to 1,300 homes and up to 7,000sqm commercial floorspace.

Decision: Resolution to grant, subject to a legal agreement, referral to the Mayor of London and Secretary of State (3rd June 2019).

334. 18/AP/0897 Ruby Triangle Site, Land bounded by Old Kent Road, Ruby Street and Sandgate Street

Application type: FULL

Full planning permission is sought for demolition of existing buildings and structures on the site, and redevelopment consisting of three buildings at maximum heights of 17 storeys (including mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (including mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,152 residential dwellings (Class C3), retail, business and community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works.

335. 18/AP/3246 Land at Cantium Retail Park, 520 Old Kent Road

Application type: FULL

Demolition of existing buildings and redevelopment of the site to provide a new basement level and buildings ranging from 3 to 48 storeys in height (max height 159.05m above ground level) comprising up to 1,113 residential units (Class C3), up to 5,659 sq. m of office floorspace (Class B1(a)), up to 2,228 sq. m of retail floorspace (Class A1), up to 2,336 sq. m of flexible space including use within Classes A1, A3, B1(a), B1(b), D1, D2 and / or Sui Generis (Theatre) within Block B and up to 596 sq. m of flexible space within Classes A1, A2 and / or A3 within Block C together with associated access, car parking, landscaping and infrastructure works.

Decision: Resolution to grant, subject to a legal agreement, referral to the GLA and Secretary of State (5th March 2019).

336. 17/AP/4596 13-14 Frensham Street, (Nye's Wharf)

Application Type: FULL

Demolition of existing buildings and erection of mixed-use scheme comprising 321sqm (GIA) of flexible A1, A2, A3, A4, B1, D1 and D2 floorspace and 882sqm (GIA) of B1 floorspace at ground and mezzanine levels; with 153 Residential units (Class C3) above in two blocks ranging from 9 to 18 storeys with hard and soft landscaping and associated infrastructure works, including three disabled spaces and cycle parking.

Decision: Resolution to grant, subject to a legal agreement and referral to the GLA (3rd September 2018).

337. 17/AP/4612 49-53 Glengall Road

Application type: FULL

Demolition of all existing buildings and structures (excluding some of the facades along Glengall Road and Bianca Road and the industrial chimney) and erection of a part 6, 8 and 15 storey mixed-use development comprising 3,855 sqm (GIA) of flexible workspace (Use Class B1) and 181 residential units (Use Class C3) with amenity spaces and associated infrastructure.

Decision: Resolution to grant, subject to a legal agreement, referral to the GLA and Secretary of State (15th January 2019).

338. 18/AP/3551 Southernwood Retail Park

Application type: FULL and OUTLINE

Hybrid planning application for detailed permission for Phase 1 and outline planning permission for Phase 2 comprising:

Application for full planning permission for 'Phase 1' comprising demolition of existing buildings and the erection of a part 9, part 14, part 15, part 48 storey

development (plus basement) up to 161.25m AOD, with 940 sqm GIA of (Class A1) retail use, 541 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use, 8671 sqm GIA (Class C1) hotel; 541 (class C3) residential units (51,757 sqm GIA); landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.

Application for outline planning permission (with details of internal layouts and external appearance reserved) for 'Phase 2' comprising demolition of existing buildings and the erection of a part 9, part 12, storey development (plus basement) up to 42.80m AOD, with 1049 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use; 183 (Class C3) residential units (17,847sqm GIA), 1141 sqm GIA (Class D2) cinema and the creation of a 475 sqm GIA (Class C1) hotel service area at basement level; landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.

Decision: Resolution to grant, subject to legal agreement, and referral to GLA (28 May 2019).

339. 19/AP/1322 – 840 Old Kent Road

Application type: FULL

Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 168 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.

Decision: Resolution to grant, subject to legal agreement, and referral to GLA (05 February 2020).

Planning policy

340. The statutory development plans for the Borough comprise the National Planning Policy Framework 2019, London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The site falls within the area covered by the draft Old Kent Road Area Action Plan (draft OKR AAP).

Planning policy designations

341. The application site is found within the following Planning Policy Designations:

- The Old Kent Road Opportunity Area;
- Draft OKR AAP site OKR 16;
- Preferred Industrial Location - Strategic
- The Urban Density Zone;
- Bermondsey Lake Archaeological Priority Zone;
- The Air Quality Management Area;
- Public Transport Accessibility Level (PTAL) of 2;
- Extended background area (Wider Setting Consultation Area) of LVMF

- views 2A.1, 3A.1, and 6A.1 and
- Flood Zone 3

342. This application was determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant.

Adopted Policy

National Planning Policy Framework

343. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.

344. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

345. Section 2 - Achieving sustainable development
 Section 5 - Delivering a sufficient supply of homes
 Section 6 - Building a strong, competitive economy
 Section 7 - Ensuring the vitality of town centres
 Section 8 - Promoting healthy and safe communities
 Section 9 - Promoting sustainable transport
 Section 11 - Making effective use of land
 Section 12 - Achieving well-designed places
 Section 14 - Meeting the challenge of climate change, flooding and coastal change
 Section 15 - Conserving and enhancing the natural environment
 Section 16 - Conserving and enhancing the historic environment

346. National Planning Policy Guidance (2014) is a web-based resource which brings together planning guidance on various topics into one place.

London Plan 2016

347. The London Plan is the regional planning framework and was adopted in 2016. The most relevant policies are those listed below.

348. Policy 2.17 - Strategic Industrial locations
 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 3.8 - 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 4.3 - Mixed use development and offices
 Policy 4.4 - Managing industrial land and premises
 Policy 5.7 - Renewable energy
 Policy 5.8 - Innovative energy technologies
 Policy 5.11 - Green roofs and development site environs
 Policy 5.12 - Flood risk management
 Policy 5.13 - Sustainable drainage
 Policy 5.21 - Contaminated land
 Policy 6.9 - Cycling
 Policy 6.10 - Walking
 Policy 6.13 - Parking
 Policy 7.2 - An inclusive environment
 Policy 7.3 - Designing out crime
 Policy 7.4 - Local character
 Policy 7.6 - Architecture
 Policy 7.21 - Trees and woodlands
 Policy 8.2 - Planning obligations
 Policy 8.3 - Community infrastructure levy

349. The London Plan 2016 identifies the Old Kent Road as an Opportunity Area with “significant potential for residential – led development along the Old Kent Road corridor”. Opportunity Areas are described in the London Plan (2016) as London’s major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.
350. Policy 2.13 in the London Plan 2016 sets out the strategic policy for the development and intensification of opportunity areas. Annex 1 includes an indicative capacity for Old Kent Road of 2,500 homes and 1,000 jobs and supports the development of a planning framework to realise the area’s full growth potential. It goes on to state that the employment and minimum homes figures should be explored further and refined in a planning framework for the area.

Mayoral SPGs

351. The following Mayoral SPGs are relevant to the consideration of this application:
352. Homes for Londoners (2017)
 London View Management Framework (2012)
 London’s World Heritage Sites SPG (2012)
 Providing for Children and Young People’s Play and Informal Recreation (2008)
 Use of planning obligations in the funding of Crossrail (2010)
 Affordable Housing and Viability SPG (2017)

Core Strategy 2011

353. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

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 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

354. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

Policy 1.1 - Access to employment opportunities
 Policy 1.2 - Strategic and local preferred industrial locations
 Policy 1.5 - Small businesses
 Policy 2.2 - Provision of new community facilities
 Policy 2.5 - Planning obligations
 Policy 3.2 - Protection of amenity
 Policy 3.3 - Sustainability assessment
 Policy 3.4 - Energy efficiency
 Policy 3.6 - Air quality
 Policy 3.7 - Waste reduction
 Policy 3.9 - Water
 Policy 3.11 - Efficient use of land
 Policy 3.12 - Quality in design
 Policy 3.13 - Urban design
 Policy 3.14 - Designing out crime
 Policy 3.15 - Conservation of the Historic Environment
 Policy 3.18 – Setting of Listed Buildings, Conservation Areas and World Heritage Sites
 Policy 3.19 – Archaeology
 Policy 3.20 – Tall Buildings
 Policy 3.22 – Important Local Views
 Policy 3.28 - Biodiversity
 Policy 4.2 - Quality of residential accommodation
 Policy 4.3 - Mix of dwellings
 Policy 4.4 - Affordable housing
 Policy 4.5 - Wheelchair affordable housing
 Policy 5.2 - Transport impacts
 Policy 5.3 - Walking and cycling
 Policy 5.6 - Car parking
 Policy 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents (SPDs)

355. The following Southwark SPDs are relevant to the consideration of this application:

Development Viability SPD (2016)
 Technical Update to the Residential Design Standards SPD (2015)
 Section 106 Planning Obligations/CIL SPD (2015)
 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)

Emerging planning policy

Draft New London Plan

356. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Minor suggested changes to the plan were published on 13th August 2018 and an Examination in Public (EIP) began on 15th January 2019 and closed in May 2019. The Inspector's report and Panel Recommendations were issued to the Mayor of London in October 2019. The Mayor then issued his intentions to publish the London Plan along with a statement of reasons for not including all of the Inspector's recommendations to the Secretary of State. The Secretary of State has responded to the Mayor, in February 2020 and has directed changes to the New London Plan including the deletion of the no nett loss of industrial land policy. Until the London Plan reaches formal adoption it can only be attributed limited weight.
357. The draft New London Plan identifies the Old Kent Road as having a minimum capacity for 12,000 homes and a jobs target of 5,000, which increases the capacity of the adopted London Plan of 2,500 homes and 1,000 jobs.

New Southwark Plan

358. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019. The New Southwark Plan Submission Version – Proposed Modifications for Examination was submitted to the Secretary of State in January 2020 for Local Plan Examination. It is anticipated that the plan will be adopted in late 2020 following an Examination in Public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

Old Kent Road Area Action Plan (OKR AAP/OAPF)

359. The council is preparing an Area Action Plan/Opportunity Area Planning Framework for Old Kent Road (AAP/OAPF) which proposes significant transformation of the Old Kent Road area over the next 20 years, including the

extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. Consultation has been underway for 4 years, with a first draft published in 2016. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2017 and concluded consultation on 21 March 2018. As the document is still in draft form, it can only be attributed limited weight.

360. Whilst acknowledging this limited weight, members are advised that the draft OKR AAP places the application site within the proposed Action Area Core, and within proposal site OKR 16 which covers the area bounded by Hatcham Road and Ilderton Road. Requirements for this allocation site include the re-provision of existing industrial floor space in Use Class B8, and to provide residential accommodation in Use Class C3, and the provision of Affordable Work space in Use Class B1c.

Environmental impact assessment

361. Under planning reference 19/AP/0686 a Scoping Opinion was submitted detailing the proposal that eventually formed the scheme under consideration in this application. The documentation submitted as part of the Scoping Opinion was carried out in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
362. As the development would introduce more than 150 dwellinghouses (Schedule 2 development classified under item 10 (b)), it was therefore necessary to assess the potential impact of the proposal against Schedule 2 of the EIA Regulations. This was to determine whether the proposed development should be subject to a formal EIA, taking into account a number of factors relating to the characteristics of the development, its location, and the types and characteristics of the potential impacts.
363. Based on the required assessment, no significantly likely impacts were identified and it was considered that the development would not impact upon the environment virtue of factors such as its nature, size and location. Given this assessment the conclusion was that the proposed development did not constitute EIA development and therefore an assessment is not required with this application.

Human rights implications

364. This planning application engages certain human rights under the Human Rights Act 1998 (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.
365. This application has the legitimate aim of providing new mixed use development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 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	Troy Davies, Team Leader		
Version	Final		
Dated	26 May 2020		
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 Leisure		No	No
Strategic Director of Housing and Modernisation		No	No
Director of Regeneration		No	No
Date final report sent to Constitutional Team			27 May 2020

APPENDIX 1**Consultation undertaken**

Site notice date: 31/07/2019 and 3 site notices placed in Winslade Estate 29/01/2020

Press notice date: 27/06/2019

Case officer site visit date: 29/01/2020

Neighbour consultation letters sent: 01/08/2019

Internal services consulted

Ecology Officer

Economic Development Team

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

Flood and Drainage Team

HIGHWAY LICENSING

Highway Development Management

Waste Management

Urban Forester

Transport Department

Archaeology

Design and Conservation

Statutory and non-statutory organisations

Arqiva - digital communications

Civil Aviation Authority

Council for British Archaeology

Environment Agency

Greater London Authority

Historic England

London Borough of Lewisham

London Fire & Emergency Planning Authority, Fire Safety Regulations

London Underground Limited

Metropolitan Police Service (Designing out Crime)

National Air Traffic Safeguarding Office

Natural England - London Region & South East Region

Network Rail (Planning)

Thames Water - Development Planning

Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

Date	Recipient
01/08/2019	The Occupier FLAT 1 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier FLAT 10 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier FLAT 2 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier FLAT 3 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier FLAT 4 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier FLAT 5 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier FLAT 6 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier FLAT 7 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier FLAT 8 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier FLAT 9 ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier UNIT A ATAR HOUSE 179 ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier UNIT 1 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 10 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 11 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 12 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 2 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 3A CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 3B CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NW
01/08/2019	The Occupier UNIT 4 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 5 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 6 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 7 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 8 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier UNIT 9 CANTERBURY INDUSTRIAL PARK 297 ILBERTON ROAD LONDON SE15 1NP
01/08/2019	The Occupier ILBERTON PRIMARY SCHOOL ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier 10 MANOR GROVE LONDON SE15 1SX
01/08/2019	The Occupier 107-113 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 110-116 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 113 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 115-125 ORMSIDE STREET LONDON SE15 1TB
01/08/2019	The Occupier 118-120 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 12 MANOR GROVE LONDON SE15 1SX
01/08/2019	The Occupier 127-135 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 132-136 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 137 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 139 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 140 ILBERTON ROAD LONDON SE15 1NT
01/08/2019	The Occupier 141 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 143 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 14-38 HATCHAM ROAD LONDON SE15 1TW
01/08/2019	The Occupier 145 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 147 ORMSIDE STREET LONDON SE15 1TF
01/08/2019	The Occupier 148-150 ILBERTON ROAD LONDON SE15 1NT
01/08/2019	The Occupier 179A ILBERTON ROAD LONDON SE16 3LA
01/08/2019	The Occupier 18 MANOR GROVE LONDON SE15 1SX
01/08/2019	The Occupier 180 ILBERTON ROAD LONDON SE15 1NT
01/08/2019	The Occupier 182-196 ILBERTON ROAD LONDON SE15 1NT
01/08/2019	The Occupier 18-22 PENARTH STREET LONDON SE15 1TX
01/08/2019	The Occupier 202 ILBERTON ROAD LONDON SE15 1NT

01/08/2019 The Occupier 206-210 ILBERTON ROAD LONDON SE15 1NT
 01/08/2019 The Occupier 21 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier 212 ILBERTON ROAD LONDON SE15 1NT
 01/08/2019 The Occupier 214 ILBERTON ROAD LONDON SE15 1NT
 01/08/2019 The Occupier 217 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier 221 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier 223-225 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier 227-255 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier 235 RECORD STREET LONDON SE15 1TL
 01/08/2019 The Occupier 236 RECORD STREET LONDON SE15 1TL
 01/08/2019 The Occupier 24 MANOR GROVE LONDON SE15 1SX
 01/08/2019 The Occupier 24A MANOR GROVE LONDON SE15 1SX
 01/08/2019 The Occupier 24B MANOR GROVE LONDON SE15 1SX
 01/08/2019 The Occupier 25 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier 60 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier 67-105 ORMSIDE STREET LONDON SE15 1TF
 01/08/2019 The Occupier 8 MANOR GROVE LONDON SE15 1SX
 01/08/2019 The Occupier IBERIA HOUSE MANOR GROVE LONDON SE15 1EQ
 01/08/2019 The Occupier PENARTH WORKS PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 1 2 AND 4 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 11 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 12 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 13 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 14 AND 15 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 19 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 20 LEFT THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 20 RIGHT THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 21A THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 21B THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 22 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 23 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 24 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 25 AND 26 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 28A THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 28B THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 29 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 3 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 30 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 31 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 34 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 7 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNIT 8 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNITS 16 AND 17 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNITS 18 AND 33 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNITS 32 AND 32A THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier UNITS 5 AND 6 THE PENARTH CENTRE PENARTH STREET LONDON SE15 1TR
 01/08/2019 The Occupier RIVER OF LIFE PENTECOSTAL CHURCH 12-38 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier ASAHOLAH SALVATION CHURCH OF GOD 137A ORMSIDE STREET LONDON SE15 1TF
 01/08/2019 The Occupier FIRST FLOOR 145 ORMSIDE STREET LONDON SE15 1TF
 01/08/2019 The Occupier GROUND FLOOR 145 ORMSIDE STREET LONDON SE15 1TF
 01/08/2019 The Occupier FLAT A 152 ILBERTON ROAD LONDON SE15 1NT
 01/08/2019 The Occupier FLAT B 152 ILBERTON ROAD LONDON SE15 1NT
 01/08/2019 The Occupier FLAT A 154 ILBERTON ROAD LONDON SE15 1NT

01/08/2019 The Occupier FLAT B 154 ILBERTON ROAD LONDON SE15 1NT
 01/08/2019 The Occupier ILBERTON WHARF 1-7 ROLLINS STREET LONDON SE15 1EP
 01/08/2019 The Occupier FIRST FLOOR REAR 180 ILBERTON ROAD LONDON SE15 1NT
 01/08/2019 The Occupier GROUND FLOOR 180 ILBERTON ROAD LONDON SE15 1NT
 01/08/2019 The Occupier PART FIRST FLOOR FRONT 180 ILBERTON ROAD LONDON SE15 1NT
 01/08/2019 The Occupier FIRST FLOOR FLAT 209 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT A 209 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier SECOND FLOOR FLAT 209 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT 1 211 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT 2 211 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT 3 211 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT 1 213 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT 2 213 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier INTERNATIONAL SECRETARIAT 215 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT A 217 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT A 219 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT B 219 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT 1 221 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier FLAT 2 221 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier UNITS 1 AND 2 237 RECORD STREET LONDON SE15 1TL
 01/08/2019 The Occupier CORNER OF SHARRATT STREET 257-283 ILBERTON ROAD LONDON SE15 1NS
 01/08/2019 The Occupier STUDIO 1 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 10 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 11 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 12 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 13 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 2 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 3 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 4 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 5 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 6 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 7 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 8 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier STUDIO 9 40-50 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier UNIT 1 62 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier UNIT 2 62 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier UNIT 3 62 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier UNIT 4 62 HATCHAM ROAD LONDON SE15 1TW
 01/08/2019 The Occupier FIRST FLOOR 78-94 ORMSIDE STREET LONDON SE15 1TF
 01/08/2019 The Occupier GROUND FLOOR 78-94 ORMSIDE STREET LONDON SE15 1TF
 01/08/2019 The Occupier PART FIRST FLOOR 78-94 ORMSIDE STREET LONDON SE15 1TF
 01/08/2019 The Occupier FIRST FLOOR 96-108 ORMSIDE STREET LONDON SE15 1TF
 01/08/2019 The Occupier UNIT 1 AND 2 96-108 ORMSIDE STREET LONDON SE15 1TF
 01/08/2019 The Occupier UNIT 3 AND 4 96-108 ORMSIDE STREET LONDON SE15 1TF

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

Archaeological Officer
 Ecology Officer
 Economic Development Officer
 Environmental Protection Officer
 Flood and Drainage Officer
 Urban Forester
 Design and Conservation Officer
 Transport Officer
 Highways Officer

Statutory and non-statutory organisations

Arqiva - digital communications
 Environment Agency
 London Underground Limited
 Metropolitan Police Service (Designing out Crime)
 Natural England - London Region & South East Region
 Network Rail (Planning)
 Thames Water - Development Planning
 Transport for London (referable & non-referable app notifications and pre-apps)
 United Kingdom Power Network

Neighbour and local groups consulted:

Email representation
 182-196 Ilderton Road, London, SE15
 Hever House, 7 Lovelinch Close, London
 CarneySweeney Ltd Crossway, 156 Great Charles Street, Birmingham

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	LEATHAMS PROPERTY DEVELOPMENT LTD	Reg. Number	19/AP/1773
Application Type	Full Planning Application		
Recommendation	Grant subject to Legal Agreement	Case Number	TP/2327-K

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels and an internal loading yard; and 254 residential apartments (C3); and other associated infrastructure.

This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.

At: 227-255 ILDERTON ROAD, LONDON SE15 1NS

In accordance with application received on 24/05/2019

- 1 The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:
 - Site Location Plan (MLUK 655 A P XX 0100)
 - Proposed Site Plan (MLUK 655 A P XX 1000)
 - Proposed Site Elevations East and West (MLUK 655 A P XX 1030)
 - Proposed Site Elevations North and South (MLUK 655 A P XX 1031)
 - Level 00 Proposed Tenure Plan (MLUK 655 A P XX 1090)
 - Level 00 Int. Proposed Tenure Plan (MLUK 655 A P XX 1091)
 - Level 01 and Level 01 Int. Proposed Tenure Plan (MLUK 655 A P XX 1101)
 - Level 02 Proposed Tenure Plan (MLUK 655 A P XX 1102)
 - Level 03 Proposed Tenure Plan (MLUK 655 A P XX 1103)
 - Levels 04 - 06 Proposed Tenure Plan (MLUK 655 A P XX 1104)
 - Level 07 Proposed Tenure Plan (MLUK 655 A P XX 1107)
 - Levels 08 - 20 Proposed Tenure Plan (MLUK 655 A P XX 1108)
 - Levels 21 - 23 Proposed Tenure Plan (MLUK 655 A P XX 1121)
 - Levels 24 - 26 Proposed Tenure Plan (MLUK 655 A P XX 1124)
 - Ground Floor Proposed GA Plan (MLUK 655 A SK 200423-01)
 - Level 00 Int. Proposed GA Plan (MLUK 655 A SK 200423-02)
 - Level 01 and Level 01 Int. Proposed GA Plan (MLUK 655 A SK 200423-03)
 - Level 02 Proposed GA Plan (MLUK 655 A SK 200423-04)

- Level 03 Proposed GA Plan (MLUK 655 A P XX 1203)
- Levels 04-06 Proposed GA Plan (MLUK 655 A P XX 1204)
- Level 07 Proposed GA Plan (MLUK 655 A P XX 1207)
- Levels 08-20 Proposed GA Plan (MLUK 655 A P XX 1208)
- Levels 21-23 Proposed GA Plan (MLUK 655 A P XX 1221)
- Levels 24-26 Proposed GA Plan (MLUK 655 A P XX 1225)
- Proposed GA Roof Plan (MLUK 655 A P XX 1227)
- Courtyard Elevation - North (MLUK 655 A P XX 2100)
- Courtyard Elevation - South (MLUK 655 A P XX 2101)
- Courtyard Elevation - East (MLUK 655 A P XX 2102)
- Courtyard Elevation - West (MLUK 655 A P XX 2103)
- West Elevation - Ilderton Road (MLUK 655 A P XX 3100)
- North Elevation - Rollins Street (MLUK 655 A P XX 3101)
- East Elevation - Railway (MLUK 655 A P XX 3102)
- South Elevation - Sharratt Street (MLUK 655 A P XX 3103)
- Bay Study - Core B Entrance (MLUK 655 A P XX 3800)
- Bay Study - Affordable Workspace Entrance (MLUK 655 A P XX 3801)
- Bay Study - Core A Entrance (MLUK 655 A P XX 3802)
- Bay Study - Tower Elevation 01 (MLUK 655 A P XX 3803)
- Bay Study - Tower Elevation 02 (MLUK 655 A P XX 3804)
- Bay Study - Core B Gallery (MLUK 655 A P XX 3805)
- Bay Study - Loading Yard Entrance/Exit (MLUK 655 A P XX 3806)
- Waste Strategy - Ground Floor (MLUK 655 A P XX 4110)
- Cycle Strategy - Ground Floor (MLUK 655 A P XX 4120)
- Cycle Strategy - Level 00 Int. (MLUK 655 A P XX 4121)
- Cycle Strategy - Level 01 Int. (MLUK 655 A P XX 4122)
- Private Sale Studio (0b1p) Type A (MLUK 655 A P XX 5000)
- Social Rent 1 bed (1b2p) Type A (MLUK 655 A P XX 5010)
- Private Sale 1 bed (1b2p) Type A (MLUK 655 A P XX 5011)
- Private Sale 1 bed (1b2p) Type B (MLUK 655 A P XX 5012)
- Private Sale 1 bed (1b2p) Type C (MLUK 655 A P XX 5013)
- Private Sale 2 bed (2b3p) Type A (MLUK 655 A P XX 5020)
- Social Rent 2 bed (2b4p) Type A (MLUK 655 A P XX 5021)
- Private Sale 2 bed (2b4p) Type A (MLUK 655 A P XX 5022)
- Social Rent 3 bed (3b5p) Type A (MLUK 655 A P XX 5030)
- Social Rent 3 bed (3b5p) Type B (MLUK 655 A P XX 5031)
- Private Sale 3 bed (3b5p) Type A (MLUK 655 A P XX 5032)
- Private Sale 3 bed (3b5p) Type B (MLUK 655 A P XX 5033)
- Intermediate 2 bed WCH (2b3p) Type A (MLUK 655 A P XX 5120)
- Social Rent 3 bed WCH (3b5p) Type A (MLUK 655 A P XX 5130)
- Intermediate 3 bed WCH (3b5p) Type A (MLUK 655 A P XX 5131)
- Private Sale 3 bed WCH (3b5p) Type A (MLUK 655 A P XX 5132)
- Private Sale 3 bed WCH (3b5p) Type B (MLUK 655 A P XX 5133)
- General Arrangement - Proposed Ground Level (8296 - PL- GA - 101 01)
- General Arrangement - Proposed Podium Level (8296 - PL- GA - 102 01)
- General Arrangement - Proposed Terrace/Roof Level (8296 - PL- GA - 103 01)
- General Arrangement – Proposed Play (8296 – PL- GA – 104 02)

Reason:

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

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

Reason:

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

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

- 3 Further to the submitted Framework Construction Traffic Management Plan by Markides Associates within the Transport Statement, May 2019, no development shall take place, including any works of demolition, until a written detailed construction environmental management plan (CEMP) to cover each phase of site works has been devised and submitted by the appropriate contractor for that phase for the approval of the Local Planning Authority. The CEMP shall oblige the developer and contractors to commit to current best practice with regard to site management and to use all best endeavours to minimise off site impacts. A copy of the CEMP shall be available on site at all times and shall include the following information:
- o A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures, including continuous monitoring of noise and airborne particulates in locations to be agreed with the Council's Environmental Protection Team;
 - o Engineering measures to eliminate or mitigate identified environmental impacts e.g. acoustic screening, sound insulation, dust control, emission reduction, location of specific activities on site, etc.;
 - o Arrangements for direct responsive contact for nearby occupiers with the site management during demolition and/or construction (signage on hoardings, newsletters, resident's liaison meetings);
 - o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;
 - o Site traffic controls - Routing of in-bound and outbound site traffic, one way site traffic, lay off areas, etc.;
 - o Waste Management - Accurate waste identification, separation, storage, registered waste carriers for transportation and disposal to appropriate destinations

Reason:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of unnecessary pollution or nuisance, 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 2019.

- 4 a) Either prior to or as part of the re-development works following demolition of site structures, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.
- b) In the event that contamination is found following paragraph a) above that presents a risk to future users or controlled waters or the wider environment, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken 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. The approved remediation/mitigation strategy shall be implemented as part of the development.

c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report shall be submitted to and approved in writing by the Local Planning Authority providing evidence that all works required by the remediation strategy have been completed and that the site is suitable and safe for the developed uses and in respect of the wider environment.

d) In the event that potential contamination is found at any time during development works that was not previously identified, then a scheme of investigation and risk assessment, and a remediation strategy shall be submitted to the Local Planning Authority for approval in writing, in accordance with the above paragraphs.

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 2019.

- 5 Prior to works commencing (excluding demolition) full details of all proposed tree planting including 5 street trees on Ilderton Road and 1 street tree on Sharratt Street, shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

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

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of both local biodiversity and canopy cover, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2019 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.

- 6 No works (excluding demolition) shall commence until the final detailed design for the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve the greenfield runoff rate of 1.8 l/s as detailed in the Drainage Addendum prepared by BWB in December 2019. The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy 5.13 of the London Plan (2016).

- 7 Before demolition to ground level slab, a detailed scheme showing the complete scope and arrangement of the 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 2019.

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

- 8 Prior to the commencement of any above grade works (excluding demolition), details of bird and/or bat nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority. No less than 6 House Sparrow Terraces on the eastern edge of the podium, 10 Swift bricks on the roof of the eastern elevation of Block A and 10 bat bricks on the eastern side of the Block B roof shall be provided and the details shall include the exact location, specification and design of the habitats. The terraces / tubes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained. The terraces / tubes shall be installed strictly in accordance with the details so approved and shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the terrace/tube features and mapped locations and Southwark Council agreeing the submitted plans. A post completion assessment will be required to confirm the terrace/tube features have been installed to the agreed specification.

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.

- 9 Prior to commencement of any works above grade (excluding demolition), detailed drawings at a scale of 1:5 or 1:10 through:
- i) all facade variations; and
 - ii) commercial fronts and residential entrances; and
 - iii) all parapets and roof edges; and
 - iv) all balcony details; and
 - v) heads, cills and jambs of all openings
- to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority 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 quality of the design and details in

accordance with the National Planning Policy Framework 2019, Policy 7.7 Location and Design of Tall Buildings of the London Plan 2016, 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).

- 10 Prior to the commencement of any above grade works (excluding demolition), samples of all external facing materials and full-scale (1:1) mock-ups of the facades to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The facades to be mocked up should be agreed with the Local Planning Authority.

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework 2019, Policy 7.7 of the London Plan 2016, 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)

- 11 Prior to the commencement of any above grade works (excluding demolition), details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

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 2019, Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark Plan 2007.

- 12 Prior to the commencement of any above grade works (excluding demolition), details and 1:50 scale drawings of the secure cycle parking facilities and servicing layout and its relationship with the public highway shall be submitted to be approved in writing by the Local Planning Authority. The cycle parking facilities shall be provided prior to the occupation of the development and thereafter 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

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with The National Planning Policy Framework 2019, Strategic Policy 2 - Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

- 13 Prior to the commencement of any above grade works (excluding demolition), details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) 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. Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and Southwark Council agreeing the submitted plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

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 (Green Infrastructure: the Multifunctional Network of Green and Open Spaces), 5.3 (Sustainable Design and Construction), 5.10 (Urban Greening) and 5.11 (Green Roofs and Development Site Environs) of the London Plan 2016; Strategic Policy 11 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

- 14 Prior to the commencement of any above grade works (excluding demolition), the applicant shall submit written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans meet the standard of the Approved Document M of the Building Regulations (2015) required in the schedule below and as corresponding to the approved floor plans. The development shall be carried out in accordance with the details thereby approved by the appointed building control body.

M4 (Category 3) 'wheelchair user dwellings':- at least 10%

M4 (Category 2) 'accessible and adaptable':- remaining units

Reason:

In order to ensure the development complies with Core Strategy 2011 Strategic Policy 5 (Providing new homes) and London Plan 2016 Policy 3.8 (Housing choice).

- 15 Prior to commencement of any above grade works (excluding demolition), the following further information on the Air Source Heat pumps should be submitted and approved by the Local Planning Authority:

- The heat pump's total capacity (kWth).
- An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.
- Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).
- Manufacturer datasheets showing performance under test conditions for the specific source and sink temperatures of the proposed development and assumptions for hours spent under changing source temperatures. Whether any additional technology is required for hot water top up and how this has been incorporated into the energy modelling assumptions.
- An estimate of the expected heating costs to occupants, demonstrating that the costs have been minimised through energy efficient design.

- The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently.
- A commitment to monitor the performance of the heat pump system post construction to ensure it is achieving the expected performance approved during planning.

Reason:

To ensure the proposal complies with The National Planning Policy Framework 2019, The London Plan 2016, 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.

- 16 Prior to the commencement of any above grade works (excluding demolition), full particulars of the sprinkler system to be used within the ground floor units shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any approval given.

Reason:

To ensure that there is an adequate level of fire safety within this mixed use development.

- 17 Prior to the commencement of any above grade works (excluding demolition), details of the specification of glass with an appropriate reflectivity, demonstrating that levels of glare would be reduced to a tolerable level at all times, to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

To ensure that occupiers of neighbouring premises or the surrounding public realm do not suffer a loss of amenity by reason of harmful glare in accordance with the National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007.

- 18 Prior to the fit out of any of the commercial premises, 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 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. Before 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 2019, 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.

- 19 Prior to the installation of any lighting, a detailed lighting strategy and design for all internal and external lighting, demonstrating compliance with the Institute of Lighting Professionals (ILP) Guidance Notes, shall be submitted to and approved by the Local Planning Authority in writing. 23.00 hrs shall be the curfew for light pollution / light spillage assessment and implementation of the approved lighting strategy. If mitigation is required to avoid harmful light pollution or light spillage it shall be implemented

prior to the first use of the building and retained as such thereafter.

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 amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework 2019, 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.

- 20 Prior to the commencement of any landscaping works, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any access, terraces, 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 2019 Chapters 8, 12, 15 & 16 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.

- 21 Prior to the commencement of fit out works for each B8 or B1(c) unit, full particulars and details of a scheme for the fit out to an appropriate level for B8 or B1(c) use shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given. This should include details of the mechanical and electrical fit out of the units, showing heating and cooling provision, the inclusion of sprinkler systems for fire safety purposes, the provision of goods lifts, and the provision of kitchen and toilet facilities. The development shall not be carried out otherwise than in accordance with any approval given, and practical completion of the B8 or B1(c) fit out shall be at the same time, or before the practical completion of the residential component.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

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.

- 22 Before the first occupation of the building hereby permitted, details of the arrangements for the storing of domestic and commercial refuse shall be submitted to and approved in writing by the Local Planning

Authority and the facilities approved shall be provided and made available for use by the occupiers. The facilities 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 2019, 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

- 23 Before the first occupation of the building hereby permitted, a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to an approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

Reason:

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. This is a mandatory criterion of BREEAM (LE5) to monitor long term impact on biodiversity, a requirement is to produce a Landscape and Habitat Management Plan.

- 24 Before the first occupation of the building hereby permitted, and further to the submitted Framework Delivery and Servicing Management Plan by Markides Associates in the Transport Statement (May 2019), a detailed Delivery and Servicing Management Plan (DSMP) detailing how all elements of the site are to be serviced has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

Reason:

To ensure compliance with The National Planning Policy Framework 2019, Strategic Policy 2 Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.2 Transport Impacts of the Southwark Plan 2007.

- 25 Before the first occupation of the development hereby permitted, the applicant shall submit details of all the play spaces proposed and details of the play equipment to be installed on the site, including 1:50 scale detailed drawings for approval by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given and retained as such. The play equipment shall be provided in accordance with the details thereby approved prior to the occupation of the residential units. All play space and communal amenity space within the development shall be available to all residential occupiers of the development in perpetuity.

Reason:

In order that the Council may be satisfied with the details of the play strategy, in accordance with The National Planning Policy Framework 2019 Parts 5, 8, and 12, London Plan (2016) Policy 3.6 Children and young people's play and informal recreation facilities; policies SP11 Open spaces and wildlife and SP12 Design and conservation of The Core Strategy 2011 and the following 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 4.2 Quality of residential accommodation

- 26 Before the marketing of the development to residential occupiers, details to ensure the promotion of car

free living is clear to the occupiers of the development hereby permitted.

Reason:

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

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.

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

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with The National Planning Policy Framework 2019, 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.

- 28 The dwellings hereby permitted shall be designed to ensure that the following internal noise levels 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

The above standards may be achieved by following the recommendations contained in the Noise Impact Assessment by BWB, ref. MCP2141, May 2019. Balconies and/or winter gardens shall meet the recommendations given in section 4.17 of this report. Prior to occupation, a validation test to demonstrate achievement of the above internal noise levels shall be carried out on a sample of 5 premises rooms with a façade facing Ilderton Road. The results shall be submitted to the LPA for approval in writing.

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 2019.

- 29 The Rated sound level from any plant both serving the block as a whole or for individual future commercial operators, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the noise sensitive premises located around the site. 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, Rated and Specific Sound levels' shall be calculated fully in accordance with the methodology of BS4142:2014. Prior to first occupation, a validation test of all installed plant and equipment associated with the development shall be carried out. The results shall be submitted to the LPA for approval in writing. Any further plant and equipment shall be installed and

constructed in accordance with the approval given, and all plant and equipment 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 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

- 30 The habitable rooms within the development sharing a party ceiling or floor element with commercial premises shall be designed and constructed to achieve an airborne sound insulation performance of 55dB R_w+C_{tr} when tested in accordance with BS EN ISO 140 Parts 4 – “Acoustics. Measurement of sound insulation in buildings and of building elements. Field measurements of airborne sound insulation between rooms”.

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 2019.

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

Reason:

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

- 32 Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason:

The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

- 33 Any deliveries, unloading and loading to the commercial units shall only be between the following hours:

08.00 to 20.00hrs on Monday to Saturdays; and

10.00 to 16.00hrs on Sundays and 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 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 201 and Saved Policies 3.2 Protection of Amenity of The Southwark Plan 2007.

- 34 The use of the internal communal amenity space under the residential flats shall not be permitted outside of the hours of 08:00 to 22:00 on Mondays to Saturdays and 09:00 to 21:00 hours on Sundays. The party walls and ceilings between this space and residential dwellings shall be designed to achieve a minimum weighted standardized level difference of 60dB DnTw+Ctr. The partition's acoustic performance shall be permanently maintained thereafter.

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 2019.

- 35 Of the B class floor space hereby approved, 354 sqm (GIA) shall be secured for B1(c) use only with a minimum headroom of 3.50 metres. Any B8 floor space would have a minimum headroom of 7 metres unless otherwise agreed in writing with the Local Planning Authority.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over any subsequent alternative use, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High environmental standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

- 36 The development hereby permitted shall be constructed to include the energy efficiency measures stated in the Sustainable Energy Strategy Revision 3 prepared by MLM dated April 2020 and submitted in support of the application. All measures and technologies shall remain for as long as the development is occupied, unless otherwise agreed in writing with the Local Planning Authority.

Reason:

To ensure the development complies with the National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy and Policy 5.7 Renewable Energy of the London Plan 2015.

- 37 Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders), the Class B use hereby permitted shall only be for Class B8 and B1(c) uses as detailed in the Level 00 Proposed Tenure Plan (MLUK 655 A P XX 1090), Level 00 Int. Proposed Tenure Plan (MLUK 655 A P XX 1091) and Level 01 and Level 01 Int. Proposed Tenure Plan (MLUK 655 A P XX 1101).

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

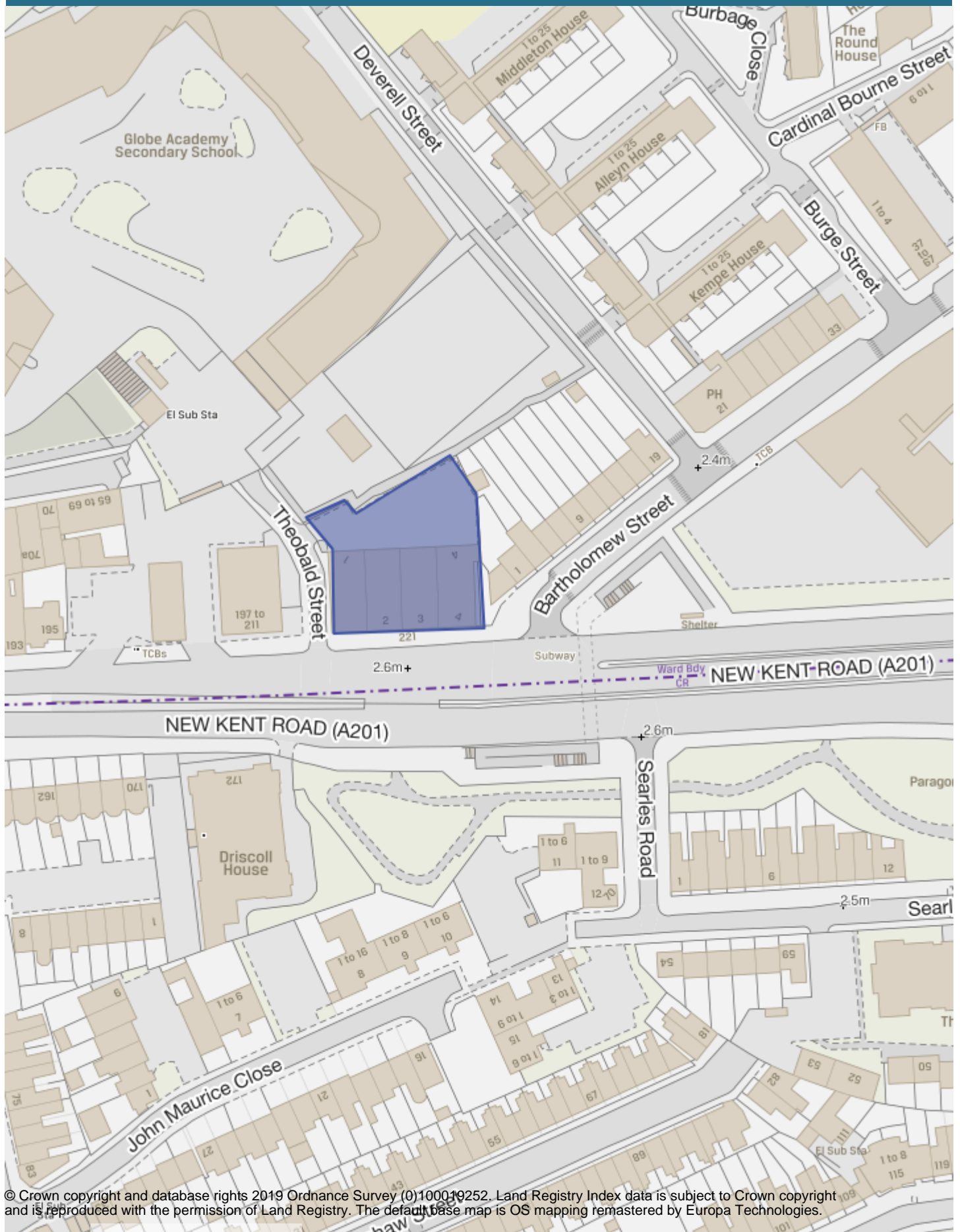
Informative notes to the applicant relating to the proposed development

THAMES WATER

1. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes>
2. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

SOUTHWARK ECOLOGIST

3. Lighting used in the proposed development should, where possible during the construction and operation phases of the development, be designed to avoid impacting the railway embankments and bridges to the east of the site in order to minimise disturbance to bats which may opportunistically use these linear features for commuting to foraging habitat in the wider area. Sensitive lighting could include installation of bollard lighting, use of warm-white LED lighting, directional installation of lighting, installation of recessed external lighting, and as a last resort installation of hoods and cowls on lamps



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50 m

Scale =

1:100,000,000

22-May-2020

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Item No. 5.2	Classification: OPEN	Date: 15 June 2020	Meeting Name: Planning committee
Report title:	Development Management planning application: Application 19/AP/5389 for: Full Planning Application Address: 221 New Kent Road London, SE1 Proposal: Demolition of existing warehouse building and erection of a part 3, part 6 and part 9 storey building providing 200 hotel rooms (Class C1) and 1,354sqm of work/maker space at ground floor (and mezzanine) (Flexible Class B1) as well as ancillary cafe/restaurant and bar facilities (Class A3/A4), along with associated landscaping, servicing yard and access works.		
Ward(s) or groups affected:	Chaucer		
From:	Director of Planning		
Application Start Date 25/09/2019		Application Expiry Date 25/12/2019	
Earliest Decision Date 29/10/2019		PPA End Date N/A	

RECOMMENDATIONS

1. That planning permission be granted, subject to the applicant entering into a satisfactory legal agreement.
2. That in the event that the legal agreement is not entered into by 15 December 2020 the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 143 of this report.

EXECUTIVE SUMMARY

3.

BACKGROUND INFORMATION

Site location and description

4. The application site is an irregular shaped plot of land currently comprising of four, two storey units in a 1980s brick building used as B8 storage space with ancillary B1a facilities. A large car park occupies the remainder of the site to the rear of the buildings. The site measures 0.16 hectares and is bound by New Kent Road to the South, which forms part of the Transport for London Road Network (TLRN) and Theobald Street to the West. The building currently comprises of 1,374 sqm of commercial floorspace (Use Class B8) with a large servicing yard and parking area to the rear which is accessed via Theobald Street. Two of the units are currently in temporary use whilst the remaining two are currently vacant. The site has a PTAL

of 6b which is considered to be excellent.

The surrounding area

5. The character of the immediate built environment is mixed in scale with heights ranging between 3-7 storeys. Around the application site, the surrounding land uses are also mixed consisting largely of residential and educational facilities. Immediately to the east across Theobald Street is a petrol station and the parade of retail shops further along New Kent Road. To the south of the application site, across the highway, the area is predominantly residential with the exception of Driscoll House which is currently in use as a hostel. The building is not listed and not within a Conservation Area. It is however, located within the setting of a number of listed buildings which is discussed in further detail in subsequent paragraphs of the report.

Details of proposal

6. Planning permission is sought for the comprehensive redevelopment of the site to provide a part 3, part 6 part 9 storey mixed use building comprising of a 200 bedroom hotel and 1,354 sqm of creative co-working/maker space (flexible B1 floorspace) with ancillary cafe/restaurant and bar facilities (Class A3/A4).

A new covered service yard would also be created to the rear of the site to serve the B1 and C1 uses. 1 no. disabled parking bay and 1 no. taxi drop off areas have been proposed together with cycle parking, landscaping and works incidental to the development.

The existing and proposed land uses are set out below:

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	Net difference (sqm)
A3/A4	0	116	116
B1	1,374	1,354	-20
C1	0	7,017	7,017
Total	1,374	8,487	/

7. The proposed building would be almost full coverage with the exception of the north-eastern corner where the application site adjoins the rear of the properties on Bartholemew Street where the building has been inset. The tallest element of the building, the 9 storey element, would be located on the junction of New Kent Road and Theobald street with the building heights stepping down towards Bartholemew Street. Two entrances are proposed, both fronting New Kent Road. The entrance to the hotel lobby is located on the junction of New Kent Road and Theobald Street. The entrance to the co-working space is located on the opposite end of the building, also fronting onto New Kent Road with additional access also provided from the servicing yard to the rear. The servicing yard would also, provide access into the hotel and commercial areas from the drop off yard. This is explained in further detail in subsequent paragraphs of this officer report.

Planning history

8. See appendix 1 for any relevant planning history of the application site.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

9. The main issues to be considered in respect of this application are:
 - Principle of the proposed development in terms of land use;
 - Environmental impact assessment;
 - Density;
 - Design, layout, heritage assets and impact on Borough and London views;
 - Landscaping and trees;
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area;
 - Transport and highways;
 - Noise and vibration;
 - Energy and sustainability;
 - Ecology and biodiversity;
 - Air quality;
 - Ground conditions and contamination;
 - Water resources and flood risk;
 - Archaeology;
 - Wind microclimate;
 - Health impact assessment;
 - Aviation;
 - Television and radio signals;
 - Socio-economic impacts;
 - Planning obligations (S.106 undertaking or agreement);
 - Mayoral and borough community infrastructure levy (CIL);
 - Community involvement and engagement;
 - Consultation responses, and how the application addresses the concerns raised;
 - Community impact and equalities assessment;
 - Human rights;
 - Positive and proactive statement, and;
 - Other matters
10. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

11. 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 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007.

12. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

13. The statutory development plans for the Borough comprise the National Planning Policy Framework 2019, London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The site falls within the area covered by the draft Old Kent Road Area Action Plan.

Planning Policy Designations

- The Central Activities Zone (CAZ)
 - The Old Kent Road Opportunity Area
 - The Urban Density Zone
 - The Borough, Bermondsey and Rivers Archaeological Priority Zone
 - The Air Quality Management Area
 - The site is allocated within the draft Old Kent Road Area Action Plan (OKR AAP)
 - Public transport accessibility level of 4-6a on a scale of 1-6 where 1 is the lowest level and 6 represents the highest.
 - The London View Management Framework views likely to be impacted upon by the proposed development are 23A.1 Centre of Bridge over from the Serpentine to the Palace of Westminster and 1A.2 Alexandra Palace Viewing corridor to St Paul Cathedral.
14. It is not located within or in close proximity to any conservation areas. There are no statutory listed buildings on the application site. The closest listed buildings are Grade II listed and have been listed below.
- Nos. 1-19 Bartholomew Street
 - Driscoll House
 - Nos. 154-170 New Kent Road
 - The Geoffrey Chaucer School
 - The Joseph Lancaster Primary School

15. This application should be determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant:

National Planning Policy Framework (the Framework)

16. National planning policy is set out in the revised National Planning Policy Framework ('the NPPF'), published in 2019 which sets out the national planning policy and how this needs to be applied. 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'.
17. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications:

Section 2 - Achieving sustainable development

Section 5 - Delivering a sufficient supply of homes
 Section 6 - Building a strong, competitive economy
 Section 7 - Ensuring the vitality of town centres
 Section 8 - Promoting healthy and safe communities
 Section 9 - Promoting sustainable transport
 Section 11 - Making effective use of land
 Section 12 - Achieving well-designed places
 Section 14 - Meeting the challenge of climate change, flooding and coastal change
 Section 15 - Conserving and enhancing the natural environment
 Section 16 - Conserving and enhancing the historic environment

The London Plan 2016

18. The London Plan is the regional planning framework and was adopted in 2016. The most relevant policies are those listed below:

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 4.2 Offices
 Policy 4.3 Mixed use development and offices
 Policy 4.5 London's visitor infrastructure
 Policy 5.7 Renewable energy
 Policy 5.8 Innovative energy technologies
 Policy 5.11 Green roofs and development site environs
 Policy 5.12 Flood risk management
 Policy 6.9 Cycling
 Policy 6.10 Walking
 Policy 6.13 Parking
 Policy 7.2 An inclusive environment
 Policy 7.3 Designing out crime
 Policy 7.4 Local character
 Policy 7.5 Public Realm
 Policy 7.6 Architecture
 Policy 7.8 Heritage assets and archaeology
 Policy 7.12 Implementing the London View Management Framework
 Policy 7.21 Trees and woodlands
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy

19. The London Plan 2016 identified the Old Kent Road as an Opportunity Area with 'significant potential for residential-led development along the Old Kent Road corridor'. Opportunity Areas are described in the London Plan (2016) as London's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.
20. Policy 2.13 in the London Plan 2016 sets out the strategic policy for the development and intensification of opportunity areas. Annex 1 includes an indicative capacity for Old Kent Road of 2,500 homes and 1,000 homes and supports the development for a planning framework to realise the area's full growth potential. It does on to state that the employment and minimum homes figures should be explored further and refined in a planning framework for the

area and through a review of the Strategic Industrial Locations and capacity to accommodate a phased rationalisation of its functions in the opportunity area or provision elsewhere.

Core Strategy 2011

21. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

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

Southwark Plan 2007 (July) - saved policies

22. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

1.1 - Access to employment opportunities
 1.4 - Employment sites outside the Preferred Office Locations and Preferred Industrial Locations
 1.7 - Development within town and local centres
 1.11 - Arts, culture and tourism uses
 1.12 - Hotels
 2.5 - Planning obligations
 3.1 - Environmental effects
 3.2 - Protection of amenity
 3.3 - Sustainability assessment
 3.4 - Energy efficiency
 3.6 - Air quality
 3.7 - Waste reduction
 3.9 - Water
 3.11 - Efficient use of land
 3.12 - Quality in design
 3.13 - Urban design
 3.14 - Designing out crime
 3.15 - Conservation of the Historic Environment
 3.18 - Setting of Listed Buildings, Conservation Areas and World Heritage Sites
 3.19 - Archaeology
 3.20 - Tall Buildings
 3.22 - Important Local Views
 3.28 - Biodiversity
 5.2 - Transport impacts

- 5.3 - Walking and cycling
- 5.6 - Car parking
- 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents (SPDs)

- 23. Technical Update to the Residential Design Standards SPD (2015)
Section 106 Planning Obligations/CIL SPD (2015) Affordable housing SPD (2008 - Adopted and 2011 - Draft)
Sustainable Transport SPD (2010)
Sustainable design and construction SPD (2009)
Sustainability assessments SPD (2009)

Emerging policy

Draft New London Plan

- 24. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Minor suggested changes to the plan were published on 13 August 2018 and an Examination in public (EIP) began on 15 January 2019. Further suggested changes to the Plan have been proposed by the Mayor and published in response to the EIP Panel of Inspector's matters at the examination sessions. Until the London Plan reaches formal adoption it can only be attributed moderate weight. The draft New London Plan identified the Old Kent Road as having a minimum capacity for housing of 12,000 and a jobs target of 5,000.

New Southwark Plan (NSP)

- 25. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018 and undertook a further consultation on the New Southwark Plan Proposed Submission Version: Amended Policies Version in January 2019.
- 26. The New Southwark Plan Submission Version – Proposed modifications for Examination was submitted to the Secretary of State in January 2020 for Local plan Examination. It is anticipated that the plan will be adopted in late 2020 following an Examination in public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

Old Kent Road Area Action Plan (OKR AAP)

- 27. The council is preparing an Area Action Plan/Opportunity Area Planning Framework for Old Kent Road (AAP/OAPF) which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. Consultation has been underway for 3 years, with a first draft published in 2016. A further preferred option of the Old Kent

Road AAP (Regulation 18) was published in December 2017 and concluded consultation on 21st March 2018. As the document is still in draft form, it can only be attributed very limited weight.

Assessment

Principle of the proposed development in terms of land use

28. The National Planning Policy Framework 2019 (NPPF) offers a number of key principles that emphasise a focus on driving and supporting sustainable economic development to facilitate the delivery of new homes and commercial business units etc. The application site is located within the Old Kent Road Opportunity Area, designated by the London Plan (2015) and Central Activities Zone (CAZ), the strategic functions for which are set out in Policies 2.10 and 2.1 of the London Plan. For the CAZ, this includes enhancing and promoting the roles of the CAZ based on a mix of local and strategic uses. Southwark's Core Strategy reinforces the London Plan aspirations for development in the CAZ to support London as a world class city. Both the CAZ and Opportunity Areas are targeted as growth areas in the borough where development will be prioritised. Strategic Policy 1 of the Core Strategy states that the council will allow more intense development for a mix of uses in growth areas and will make sure that development makes the most of a site's potential and protects open space.
29. 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 opportunity areas 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 (para 2.58). 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. The Old Kent Road AAP aims to achieve growth that is greater than what is being targeted by the London Plan, with the creation of 20,000 new homes and 10,000 new jobs as proposed in the draft Area Action Plan (2017). In locations such as this, both London Plan and Southwark Plan policies strive for higher density, high quality mixed-use developments which assist in addressing the need for new homes and provide a range of employment opportunities.
30. The proposed building would host a range of uses including a hotel (C1), workspace (B1) and ancillary associated café/restaurant facilities (A3-A4) in a part 3, part 6 and part 9 storey building which would contribute to the aforementioned aspirations of the CAZ to sustain higher densities of quality mixed use developments; the principle of each land use has been detailed in the subsequent paragraphs of the report.

Provision of C1 floorspace

31. Policy 4.5 of the London Plan sets a target of 40,000 net additional hotel bedrooms by 2036, of which at least 10% should be wheelchair accessible. It advises that new visitor accommodation should be in appropriate locations. These include the CAZ, where strategically important hotel provision should be focussed within opportunity areas and smaller scale provision in CAZ fringe locations with good public transport. Beyond the CAZ hotel provision should be focussed within town centres and opportunity areas where there is good access

to public transport. It advises that further intensification of hotel provision in areas of existing concentration should be resisted, except where it would not compromise local amenity or the balance of local land uses. The draft New London Plan does not establish a target like the current plan does but estimates that the need for visitor accommodation for London is predicted to rise to 58,000 bedrooms of serviced accommodation by 2041.

32. At borough level Strategic Policy 10 of the Core Strategy advises that hotels will be permitted in town centres, the strategic cultural areas and places with good access to public transport services provided they do not harm the local character. Saved policy 1.12 of the Southwark Plan advises that hotels and other visitor accommodation will be encouraged in areas with high public transport accessibility; these will not be permitted where they would result in a loss of existing residential accommodation, or an over dominance of visitor accommodation in the locality.
33. The Council's emerging policy, draft New Southwark Plan Policy P36 contains further guidance on visitor accommodation. The policy states that:
 1. Development for hotels and other forms of visitor accommodation must not harm the local character or amenity by reason of the design, scale, function, parking and servicing arrangements.
 2. A minimum of 10% of the total floorspace must be provided as ancillary facilities. Hotel developments will be permitted where they incorporate a range of daytime uses and offer employment opportunities.
34. The proposal under consideration would include a large area of employment floor space as well as café and restaurant space which will be available to hotel visitors, those using the employment space and members of the public alike providing opportunities for daytime activation of the site. Whilst recognising that the policy is in draft form, the application would nonetheless conform to the central aspirations of delivering visitor accommodation with a strong ancillary facility provision, providing approximately 16% of the total floorspace as employment facilities.

Quality of hotel provision

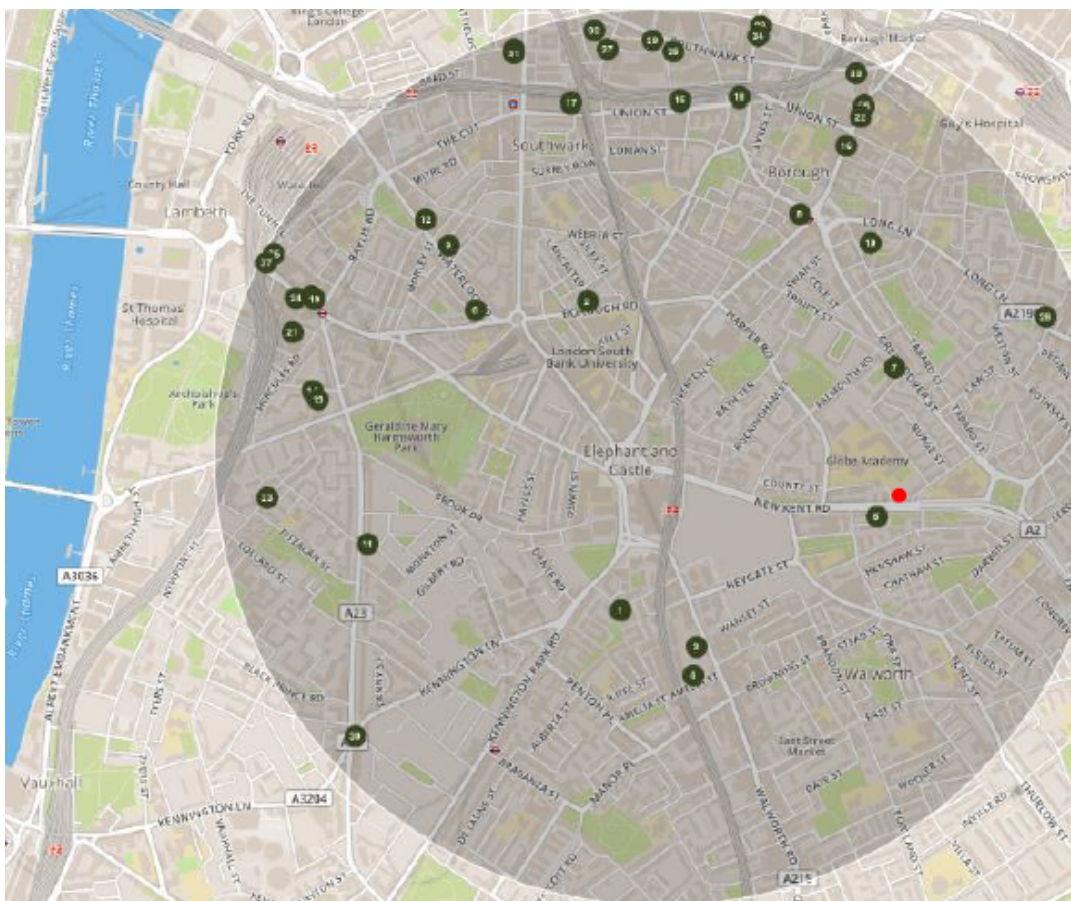
35. Whilst there is no guidance at local level on quality of hotel accommodation, the proposal is considered to be of good quality. The internal arrangement of the building is simple and follows logical layout. All bedrooms are well designed and would have ample fenestration providing good levels of daylight/sunlight and outlook. Mechanical ventilation with heat recovery is also proposed which would ensure good levels of air flow and ventilation throughout the development. 20 of the 200 bedrooms would be wheelchair accessible and located in close proximity to the proposed lift core. This would equate to the 10% requirement of the London Plan Policy 4.5 to provide wheelchair accessible serviced accommodation, making the proposal fully policy compliant in this respect.

Overprovision of hotels

36. By virtue of its location within the CAZ and an Opportunity Area and in an area of good access to public transportation, being located approximately 750m equidistantly from Elephant and Castle rail station and Borough tube station (and within good bus transport links), policy considers locations such as these to be

suitable for a hotel. In relation to the Saved Southwark Plan Policy criterion about over dominance, notwithstanding that a hotel on this site may be appropriately located and in general conformity with adopted and emerging policies, the requirement for the proposal to not result in an over dominance of visitor accommodation must be considered.

37. Information has been provided by the agent which includes an analysis of the existing hotel supply within a study area and hotels planned within the development pipeline. This demonstrates that provision of hotels in the immediate vicinity is limited as the existing stock has tended to be located further north, closer to the river which is also the assessment of the NSP Hotel Background paper (2019). The analysis highlights that the supply of hotels within a given catchment area, existing and planned, are not in close proximity to the development site. The assessment provided also highlights that the demand for hotels in Southwark is further driven by localised needs particular to this part of the borough and of London. This includes the important role of visitor accommodation to support the key functions of the city in this area which includes the number of major tourist attractions as well as the strong healthcare sector. Based on this assessment, the study demonstrates that there is capacity for further hotel development in this location, particularly in the mid-scale range.
38. It is also worth noting that the application site is also located within the London Plan's Strategic Cultural Area 2 South Bank/Bankside/London Bridge, which is defined in part F of the London Plan Policy 4.5 as a major cluster of visitor accommodation and where by definition a higher proportion of visitor accommodation is to be expected, subject to considerations of over-dominance. Whilst it is acknowledged that Southwark has exceeded the targets set out by the London Plan for visitor accommodation, as has been noted by the inspector for the recent appeal on 160 Blackfriars Road, this is not in itself equivalent to over-dominance.
39. In light of the above and as evidenced by the assessments provided, it is not considered that this application would result in the overprovision of hotels. Nor that this would result in the intensification of hotel provision in areas of existing concentration which would be detrimental to the character or balance of land uses within the area. Within the Old Kent Road Opportunity Area, it is also not considered either that there is an overprovision of hotel uses either existing or planned. A hotel and the northern end of the Opportunity area is considered to be appropriately situated to ensure its positive contribution to the wider aspirations for the regeneration of the area. In this regard, the application is consistent with both adopted and emerging planning policies on visitor accommodation, and as such the C1 use is supported.



Town Centre Uses

40. The site is not currently located within a designated Town Centre. It does however fall within the boundary of one of the two new District Town Centres proposed in the draft New Southwark Plan and draft OKR AAP. These two new designated district town centres are proposed in the emerging plan in order to better meet the needs of existing and new residents and workers in the Old Kent Road area. The new centres would include retail, leisure, entertainment and recreation facilities in a significantly more attractive and accessible environment. The Southwark Retail study 2015 and the 2018 Old Kent Road update provide a robust and credible evidence base to inform the council's work on the NSP and AAP. The report recommends that retail provision in the Old Kent Road area could be expanded and there is opportunity for new sectors that are currently poorly presented such as food and beverage offers which have the ability to support important services within town and local centres.
41. Acknowledging its limited weight, draft NSP Policy P30 states that town centre uses will be permitted in town centres where:
- The scale and nature is appropriate to the role and catchment of the centre; and
 - A Use Classes are retained or replaced by an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and
 - The development would not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the character of the area; and
 - The development provides an active use at ground floor in locations with

- high footfall; and
 - Large schemes for town centre uses that are 1,000 sqm or more provide public toilets, public drinking fountains and public seating.
42. Again, acknowledging its very limited weight, draft OKR AAP Policy AAP 7, Town Centres, Leisure and Entertainment, identifies the site as falling in a district centre and identifies the uses that would be appropriate, including retail, community, leisure, cultural and offices above shops. Furthermore Policy AAP 7 of the Draft OKR AAP notes that generally within the Old Kent Road (not just in Town Centres) development should seek to increase both the quantum and types of retail, provide a mix of sizes of unit and provide a range of leisure and food and drink uses. The proposal under consideration would include 116 sqm of A3/A4 class uses which is considered to be suitable and would assist in the delivering of this new Town centre which is one of the central aspirations of the AAP. The proposed facilities would be available to hotel residents, workspace users and the wider public and surrounding community for which the offer is at present relatively limited.

Provision of B1 floorspace

43. Strategic Policy 10 – Jobs and Businesses of the Core Strategy seeks to protect existing business floorspace in certain locations, including the CAZ, Town Centres and Action Area Cores. By virtue of its location fronting a Classified Road, the existing employment floorspace also warrants protection under Policy 1.4 of the Saved Southwark Plan – Employment Sites outside the Preferred Office Locations and Preferred Industrial Locations.
44. The site currently accommodates 1,374 sqm of B class floorspace which would be protected by the aforementioned policies. In its totality, the development would provide 1,470 sqm of commercial floor space of which 1,354 sqm would be secured as flexible B class floorspace. This is proposed to be located at ground and mezzanine levels and would be laid out as co-working/maker space. The flexible designation and design of the B class floor space has been carefully considered to ensure it would be useable for a wide array of uses and users. Ceiling heights would range from 3.1m to 4.2m double height space and a heavy goods lift with a load capacity of up to 6,300kg (or 13-84 person) is also proposed which would service the mezzanine level, reflecting the quality and variety of spaces available to sustain a range of employment uses. These will be subject to detailed conditions to ensure that this high quality provision is delivered and would also require the agreement of a workspace specification in the S106 legal agreement. As such, it is considered that the quality of the B class workspace is good. Planning conditions will also require the workspace to be fully sprinkled for fire safety purposes and achieve good sound insulation levels between the uses.
45. It must be recognised that the proposal does not achieve full reprovision of the B class floorspace with a shortfall of 20 sqm. In recommending approval officers have taken in account the very limited nature of the loss and the fact that there is an uplift in the overall amount of commercial space on the site and that other town centre uses, such as retail uses are consistent with the main road frontage and emerging town centre designation. There are also wider benefits which are discussed in further detail in the subsequent paragraphs of this officer report. The acceptability of the scheme would therefore need to be considered and whether the overall quality and economic/regeneration benefits outweigh the marginal shortfall.



Regeneration benefits of the scheme

Regeneration of an ageing industrial area

46. A borough-wide industrial and warehousing study was carried out by GVA in 2014 on behalf of Southwark Council. The study was commissioned and mostly completed before the Old Kent Road was designated as an Opportunity Area. Across Southwark, it identified that the majority of the industrial and warehousing supply is within purpose built, older premises which is of increasingly poor quality. Following this study, a further study was commissioned and which has been completed in 2019 by GVA + 00 Architects. This concluded that future employment uses in the Old Kent Road will require a mixture of spaces suitable for a broad mix of employment spaces uses including small – medium logistics, light industrial, small office and co-working spaces. Based on the poorer quality of the existing premises for commercial purposes, it is considered that the delivery of new workspace, all designed to modern B1 specifications is a positive aspect of the proposed development.

Job creation

47. Owing to the premises currently being vacant the existing FTE of the site would be zero. However should the premises be fully occupied this would support approximately 21 FTE jobs. The number of jobs generated within the proposed B1 element of the development has been calculated by applying the average job/floorspace ratio to the 1,357 sqm of commercial floorspace proposed by applying the 'Managed Workspace range' set out in the latest Employment Density Matrix published by the HCA (2015). Based on the above methodology,

the B1 element of the proposed development could support the creation of 135 FTE on-site jobs. The hotel portion of the scheme could result in a further 67 on-site FTE jobs (calculated using the same HCA methodology as above). This would represent a significant uplift in employment provision on site, with an additional 181 FTE jobs created altogether, generating a substantive increase in on-site employment on this site. This is exclusive of the 75 on-site construction jobs per annum that this proposal would generate of which 4 would be secured for Southwark Apprentices. This is proposed to be secured in the section 106 Legal Agreement.

Local expenditure

48. In addition to the direct operational benefits including from the employment, retail and leisure uses, other expenditure arising from visitors and employees to the hotel use would provide further additional local economic benefits. In an assessment provided by Savills, based on an average occupancy of 81% (average of London Hotel occupancy rates for 2017/18 and on the total expenditure and length of stay from the London & Partners research and Visit Britain ONS Data), it is estimated that the value of the total tourist expenditure per year for a 200-bed hotel scheme would be approximately £13,000,000; a proportion of which would be localised expenditure retained within Southwark.

Affordable workspace

49. Emerging policy in the revised draft Old Kent Road AAP requires schemes of this scale or larger to provide an element of affordable workspace. The applicant has agreed to provide 10% of the floorspace as affordable for a period 30 years and whilst the specific offer is still under negotiation, the applicant has agreed that the affordable portion will be offered at a rent of 25% of the market value and would be offered to local businesses first. This, along with a specified rate, will be secured through the S106 Legal Agreement

Conclusion on land use

50. To conclude on land use, the resulting development would provide a quality hotel accommodation offer, create new flexible commercial floorspace all built to modern specification, 10% of which will be affordable. The acceptability of the introduction of a hotel use within the area is considered to be appropriate given the weight that is attributed to adopted policy in relation to locations suitable for visitor accommodation and the assessment in regards to overprovision. The provision of a new improved and layout delivering a high quality building providing A, B and C class uses, all of which are appropriate on this site, would contribute to the central aspirations of the Old Kent Road opportunity area becoming a vibrant high street.
51. In regards to the loss of the existing B8 (distribution use), the policy requirement is for the re-provision of B class uses. The Core Strategy recognises that a lot of the business space is becoming outdated and the 2009 Employment Land review suggests that there may instances where, because of the condition or location, there may no longer be a demand for a particular business premises. The draft OKR AAP sets out a land use strategy with defines a hierarchy of employment uses across the Opportunity Area. This sets out locations where distribution type uses would be appropriate such that the loss on this site is mitigated through the provision and intensification of B8 uses in other areas. Within the proposed

masterplan, this area of intensification is proposed within Sub Area 2, Mandela Way. Whilst recognising the importance of distribution uses, officers consider that in this instance the loss has been justified through its planned provision in other locations and in this location's suitability for the type of co-working spaces as proposed.

52. The overall mix of uses proposed would support the ambitions set in existing and emerging policies and this must be weighed against the very minor shortfall in B class re-provision of 20 sqm. Officers consider the proposal on balance acceptable given the marginal quantum of shortfall against the overarching benefits of the scheme as set out above and below.

Design, layout, heritage assets and impact on Borough and London views

53. Section 12 of the NPPF 'Achieving well-designed places' advises that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development which creates better places in which to live and work. Policy 7.4 of the London Plan requires development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area. Policies 7.4 and 7.5 are also relevant which require developments to provide high quality public realm and architecture, and policy which 7.7 relates to the location and design of tall and large buildings.
54. Strategic policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to "achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in." Saved policy 3.12 'Quality in design' of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. Saved policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.

Layout and massing

55. The design of the scheme has had a number of revisions and iterations and has seen the scheme evolve to ensure the highest quality design. The massing has seen both a reduction in height as well as the refining of the architecture to ensure a positive relationship to its surroundings and its contribution to the streetscape. The changes made to the massing of the scheme are as follows:
 - An initial reduction in height from 15 to 9 storeys
 - Reduction and break-up of the massing to form a more refined building
 - Inclusion of additional architectural detailing to respond to its relationship with its immediate surroundings
 - Providing clarity in the design by animating and providing legibility that is

built into the design.

56. The massing strategy would result in a building that would read as a one at ground floor level extending across the New Kent Road frontage. At this ground floor level, the building has been set in further from the street than the existing building and has been designed to be outward looking, providing activity at street level onto New Kent Road. This would allow the development design to ensure a positive relationship to the street which the existing building on site does not currently. This would represent a major benefit of the scheme under consideration, in addition to these identified above.
57. As opposed to the singular approach taken on the ground floor, the upper levels of the building have been designed as being staggered which breaks up the massing of the building into three distinct and legible portions. This has resulted in a stepped approach placing the tallest element at the junction with Theobald street, reflecting to the scale of development along a major corridor. The building then steps down to 6 storeys and further down to 3 storeys where the application site meets Bartholomew Street which reflects the 3-4 storey nature of these properties along that terrace. Officers support the proposed design and are satisfied of its acceptability in relation to its quality and conformity to adopted design policies

Tall buildings

58. Being 9 storeys and measuring 27.55m in height (AOD) at its tallest point, the proposed building would not be considered to be a tall building by Saved Southwark Plan definition (buildings of over 30m in height) or by London Plan Standards as the building would not be substantially taller than its surroundings given that Driscoll House is 6-7 storeys. In addition, there is also an emerging context in relation to height along New Kent Road given the proximity of the Elephant and Castle Opportunity which would also not make the proposed building substantially taller than the wider emerging context.
59. There is a clear hierarchy of heights that is both established in the urban grain and that is emerging in relation to height and massing with taller elements fronting New Kent Road and generally stepping down to relate to the lower rise element, following the existing pattern of development. Subject to the impacts on amenity a taller element in this location is therefore justified in this location given its location within the CAZ, Old Kent Road Opportunity Area and access to public transport in addition to meeting other requirements of London Plan Policy 7.7 which states that tall and large buildings should:
 - Generally be limited to sites in the Central Activities Zone, Opportunity area, areas of intensification or town centres that have good access to public transport;
 - Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
 - Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
 - Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;
 - Incorporate the highest standards of architecture and materials, including

- sustainable design and construction practices;
- Have ground floor activities that provide a positive relationship to the surrounding streets;
- Contribute to improving the permeability of the site and wider area where possible;
- Incorporate publically accessible areas on the upper floors, where appropriate;
- Make a significant contribution to local regeneration;
- Not affect their surrounding adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, avigation and telecommunication interference; and
- Not impact on local or strategic views adversely.

60. However, it is recognised that the building would nonetheless represent a change in scale given the low density, particularly immediately north of the application site and that Driscoll House is in itself an anomaly to the immediate prevailing building heights. Policy 7.7 also states that the impact of tall buildings in sensitive locations, including the setting of conservation areas and listed buildings should be given further consideration. Officers therefore consider that the proposal also needs to be assessed against Policy 3.2 of the Saved Southwark Plan.
61. The policy states that: Planning permission may be granted for buildings that are significantly taller than their surroundings or have a significant impact on the skyline, on sites which have excellent accessibility to public transport facilities and are located in the Central Activities Zone (particularly in Opportunity Areas) outside landmark viewing corridors. Proposals for tall buildings should ensure that there are excellent links between the building(s) and public transport services. Any building over 30 metres tall (or 25 metres in the Thames Policy Area) should ensure that it:
- 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. All planning applications for tall buildings will require a design and access statement, a transport assessment and a sustainability assessment

In terms of criterion i:

The existing site is in occupation by series of industrial units forming one building fronting New Kent road with a gated service yard to the rear. The building itself is of no particular design merit and bounds the pedestrian footway along the entirety New Kent Road frontage with a predominantly blank façade, resulting in a poor urban streetscape. The proposed development would be slightly set back to allow for larger pedestrian footway and would include soft landscaping built within the elevation along the ground floor fronting the main highway as well as along Theobald Street. In addition to the generous glazed bays, the proposal would be a welcomed addition to the public realm, in addition to the positive nature of the activities at ground floor level which would address the street level well.

In terms of criterion ii:

Officers are of the view that whilst the proposed site is situated on a busy transport route and within a short distance of the Bricklayers Arms roundabout, the landmark significance of the site is limited. The application would therefore not fully comply with this aspect of the policy. However when considering the wider benefits of the proposal, including its civic significance and contributions, and the fact that the tallest point is below 30m, it is not considered to be cause such harm that it would warrant refusal of an otherwise acceptable scheme.

In terms of criterion iii:

The architecture is considered to be of a very high standard. This will be discussed further in paragraphs below. However, the key aspects of the design include its redefinition of the relationship between the street and the site in townscape terms and repairing the built fabric cohesion on this part of New Kent Road. The design comprises of a highly articulated blocks through a series of elegant cascading façades, using variations in heights to create a distinct form to the building. Series of similar repeated windows as can be expected from use such as a hotel can sometimes appear to be monotonous. Variations have been incorporated in the design, material and fenestration with columns and frames of alternating heights to provide detail and a visually interesting building whilst remaining sensitive to the existing townscape. The proposal demonstrates the highest standard of architectural design and materials.

In terms of criterion iv:

At ground floor, the proposed development would introduce active frontages along the New Kent Road with a proposed flexible mix of uses which would include retail, employment and hotel, ensuring that the building is activated and is an appropriate response to a street frontage located on a major arterial road. The proposed building would be set back from the boundary of the site with the public highway and would incorporate in built planters which would line the edge of the street. This would provide an appropriate setting for a building of this scale that would work well at street level. In particular this would reinstate a high quality design on a site that is currently somewhat fragmented from its immediate surroundings. These would altogether provide an enhanced setting and pedestrian experience to New Kent Road.

In terms of criteria v:

As it does not meet the definition of a tall building, this application is again, not expected to meet this criteria given its medium height. Nonetheless, the location of the tallest element to the corner of the site would provide an appropriate focal point to the composition of the building and as stated in other paragraphs of this report the varying heights sit well within the emerging hierarchy along New Kent Road building up towards Elephant and Castle.

London View Management Framework (LVMF)

62. London Plan (2016) Policy 7.11, London View Management Framework, and Policy 7.12, Implementing the London View Management Framework (LVMF), relate to the identified strategic views in London. These state that development should not harm these views, and where possible should make a positive contribution to the characteristics and composition of strategic views.

Supplementary Planning Guidance on the LVMF was published in March 2012.

63. The site is situated within the wider background setting of Strategic Views 1A.2 (Alexandra Palace to Central London) and 23A.1 (Centre of Bridge over the Serpentine to the Palace of Westminster) as identified in the LVMF. The Heritage and Townscape Note has been submitted which outlines that View 23A.1 has a threshold of 65-70m AOD and View 1A.2 has a threshold of 52.1m are the heights at which a development would be in breach of the view. The townscape and heritage note provided demonstrates that the tallest point of the proposed development would be well below the height of the background consultation planes of both views and would therefore not impact on either of these views.

Heritage assets

64. London Plan (2016) Policy 7.4, Local Character, states that development proposals should respond to their context, including buildings, open spaces, street patterns and the historic environment and Policy 7.8, Heritage Assets and Archaeology, seeks to record, maintain and protect London's heritage assets in order to utilise their potential within the community. It states that development should conserve the significance of any heritage asset it affects. Southwark Core Strategy Strategic Policy 12, Design and Conservation, states that development should ensure that the significance of built heritage assets is conserved. Saved Policy 3.15, Conservation of the Historic Environment of the Southwark Plan (2007) states that development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance and Policy 3.18, Setting of Listed Buildings, Conservation Areas and World Heritage Sites states that the immediate or wider settings of designated heritage assets must be preserved. The NPPF (2019) requires Local Authorities to consider the impact of a proposed development on the significance of a designated heritage asset. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should be categorised as either substantial or less than substantial. Substantial harm should only be permitted in exceptional circumstances. Less than substantial harm should be weighed against the public benefits of the proposal.
65. Whilst not located within a Conservation Area, there are a number of heritage assets within the immediate vicinity of the site. These include, to the east, Nos. 1-19 Bartholomew Street which is a Grade II listed terrace consisting of 10 houses. To the south, across the dual carriageway is the Grade II listed Driscoll House, and Nos. 154-170 New Kent Road which are also Grade II listed. To the north-west are two Grade II listed school buildings: the Ark Globe Academy (former Geoffrey Chaucer School) of 1959-60 and the Joseph Lancaster Primary School of 1875; which were merged into an academy (the Ark Global) in 2008. 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. This is also reflected in the NPPF (2019), which 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.
66. The application site does not in itself contain any Listed buildings and there would therefore be no direct impact on a Listed Building as a result of the

application but as mentioned previously the site sits within close proximity of a many listed heritage assets. The impact on the setting of the listed buildings must therefore be considered in accordance with Policy 3.18 of the Saved Southwark Plan Policies.

67. No. 1-19 Bartholomew Street

The heritage buildings with the closest relationship to the application site are Nos. 1-19 Bartholomew Street. The application site does not directly abut the listed terrace as the end of the terrace property is a modern addition that is not part of the listing.

During the course of the pre application and application process, several amendments have been made to the building in order to ensure a positive relation to the listed terrace. The height of the eastern corner of the proposed building, which would be portion of the site in closest proximity to the heritage assets, has been design to align with the tallest element of the Listed terrace, No. 1 Bartholomew Street. The detailed design of the building on the eastern corner has been chamfered to provide a continuous building line with the developments on Bartholomew Street. This would also ensure that views from New Kent Road onto the listed terraces remain unobstructed.

The massing of the 6 storey portion was reduced to allow further separation distance between the two and to ensure that the massing is not overbearing. The resulting building is considered to be well designed and the materials have been closely chosen to complement and not detract from the heritage assets. The tallest element of the proposed building would be located further west and would have no direct relationship to the terrace at street level. The distribution of heights across the site has been well considered to respond to the relationship between the two and the heritage significance of the listed terrace. An image of this has been included below which demonstrates how the building would sit in the background of the listed terrace.

It is however to be acknowledged that there will be a change to the setting of the listed building and as a result of proximity between the two sites, the proposed development would introduce massing into the background view. Given the low density nature of the existing building, the application site would protrude above the established building lines and would be visible above the row of terraces. The increase in built form to a background view of a listed asset is balanced by the design quality of the proposed development, including its contributions to townscape and is therefore any harm is judged to be less than substantial.

Driscoll House

68. Driscoll House is also Grade II Listed and its significance includes its architectural and communal value, being the first hostel for women in London. The application site does not have as close of a relationship than to the listed buildings on Bartholomew Street, being located across the dual carriageway but as the above assessment concludes, the impact of the setting of the listed building must be considered. The proposed development would be located diagonally opposite to the listed building and at its highest point would be of a comparable height to the proposed building. The stepped approach would reduce the massing and allow for a natural progression, framing the entrance of New Kent Road.

No. 154-170 New Kent Road

69. Nos. 154-170 New Kent Road are directly to the north of Driscoll House and are located at some distance to the application site, particularly owing to the width of the dual carriageway that separates the two. Driscoll House sits within their immediate setting and already represents a change in scale from the Listed terrace. The proposed building would be of a comparable height, particularly considering the separation distance between the two and the introduction of a taller element would not therefore be a discernible change in scale in the setting of the terrace.

The Ark Global Academy

70. The former Geoffrey Chaucer School of 1959-60 and the Joseph Lancaster Primary School of 1875 has had consent to be redeveloped (ref 06/AP/1855) which saw the consolidation of the two into the Ark Global Academy and the demolition the 1960s school structures, with the exception of the Pentagon Building which was considered the most important element in the Listed School. The redevelopment of the school buildings has resulted in the Grade II Listed building being framed with modern buildings, varying in scale and architecture. The application site does not have a direct visual relationship with the Listed Building. The Pentagonal structure is also not visible from the pedestrian streetscape and the redevelopment of the site would not impede on important views of the heritage structure.

Conclusion on impact on the setting of the Listed Buildings.

71. Concerns have been raised during the consultation that the proposed development would cause harm to the significance of the adjoining heritage assets, in particular the properties on Bartholomew Street. 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 views of Bartholomew Street and Driscoll House given that the immediate setting of these would change and the introduction of a new building would sit within immediate views of both of the above heritage assets but that this harm is considered less than substantial by National Planning Policy (NPPF) terms. An image of the most sensitive view, which is of the view of the terrace looking towards New Kent Road has been provided to demonstrate how the building would sit in relation to the heritage asset. This shows that whilst the proposed massing would sit within that background view, officers consider that that the scheme has been well designed to positively respond to its surroundings. It is also worth noting that at present the existing building does not contribute to, or enhance the setting of any of the listed assets.
72. The NPPF (2019) provides advice regarding the conservation and enhancement of the historic environment. Where a proposal will lead to substantial harm to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. The NPPF also provide guidance to Local Planning Authorities to balance the harm (weighed as indicated) against the benefits of a proposal. In this case, the public benefits of bringing a low density brownfield site into more productive use including the provision of active ground floor uses, an intensification of employment generating uses and high quality design are considered to outweigh the harm caused. Officers are satisfied that the public

interest is such as to decisively outweigh the harm identified above and is therefore in accordance with the NPPF. Historic England have been consulted on the proposed development and have raised no objections.



Architectural design and materiality

73. Strategic Policy 12 requires all development within the borough to achieve the “highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.” In this way, Saved Policy 3.12 states that new buildings should embrace a creative and high quality design solution, specific to their site’s shape, size, location and development opportunities and where applicable, preserving or enhancing the historic environment.
74. The proposal is designed as a brick-clad development with a simplistic material palette choice consisting of two tone brick, which is appropriate in this context and reflects the historic character of the New Kent Road established by the buildings to the east and further west along New Kent Road. Whilst a common masonry language is used throughout, two different brick tones, a Marziale cream brick and a Platinum white brick, have been used to the front and rear portions respectively to differentiate the primary front elevation to the rear massing. The base element of the building would integrate powder coated spandrel panels to frame the bays and generous openings extending across the New Kent Road frontage. This part of the building has been designed to create a strong street presence with enhanced fenestration heights to strengthen the visual connection between the ground floor and the public realm and dividing the elevation into rhythmic portions.
75. Irrigated integrated planters would frame the base of the building and would be made from Satin Nickel Kick Plates in tones to match the other metal detailings

proposed. Small architectural variations in the brickwork on the primary elevations are also proposed to delineate the commercial element from the hotel use and to provide subtle elevational variations and breaking of the monotony of a larger façade. On the ground floor concrete blocks in different bonds and resin bound gravel have been proposed. Areas of panelling for signage and wayfinding have been incorporated into the design of the building to ensure that signage can be accommodated in the future without necessitating any external mounting onto the elevation which will ensure the simplicity of the design is maintained.

76. On the upper levels the elevations have been designed with large horizontal bay windows with vertical fins integrated in a regular arrangement, adding articulation and animation to the primary façade. The vertical elements are both architectural features but are also functional and part of the window system to provide passive solar sun shading and privacy to the hotel bedrooms. These would be integrated into the fenestration and be of the same finish as the other elements on the elevation to provide design cohesion. The proposed composition and proportion are considered an appropriate architectural response and would provide with a high quality building. In order to secure this design quality, planning conditions requiring material sample submissions are recommended.



Southwark Design Review Panel (DRP)

77. This scheme was presented to the Southwark DRP in January 2019. At this review, the panel commented that the application had the ability to play an important role in improving this portion of the New Kent Road frontage. It must be noted that at the time of the DRP the scheme proposed a mixed use 'compact living scheme'. Although the use of the upper level has changed the design has not had to change to accommodate the new use.

The panel raised the following concerns:

1. The panel recognised the irregular shaped site and supported the height but suggested the design could benefit from further refinement of an intermediate scale to form a sense of progression from the existent context.
2. The panel welcomed the cascading elevated gardens.
3. The panel made comments on the hierarchy of the building and a better definition of the base, middle and top should be considered with further work on window reveal
4. The panel suggested relocating one of the entrances from Theobald Street to New Kent Road.

Officer response:

Following the comments from the panel and negotiations with officers, a number of revisions were made to address the concerns raised. The suggestions have been carefully considered and the massing reduced and given more definition, including further detailing in the brickwork to reinforce the subtle differences in the base and main body of the building. The comments from the panel have been addressed in greater detail in the main body of the report.

Landscaping and trees

78. The proposed landscaping strategy can be grouped within three categories and is as follows:

Ground floor:

79. At ground floor level, the proposal creates three distinct areas where the most substantive landscaping interventions can occur. To the main elevation, in-ground raised planters with integrated irrigators have been proposed to green the frontage of the building which will also contribute to the provision of a more positive public realm experience along New Kent Road. Given the high pedestrian footfall existing and anticipated along New Kent Road, this is considered to be an adequate strategy to provide on street greening and improvements to the public realm without obstructing the pedestrian footway. Along the western elevation on Theobald street and on the boundary with the existing Ark Global school, low growing shrubs have been designed into the scheme to frame the base of the building.
80. On the eastern boundary where the building has been inset from the boundary line, an area of planting has been created which serves both as a buffer to the adjoining residential premises as well as visual amenity to the users of the commercial floorspace. Planting has been chosen that would be suitable in this

area with tall trees which have been chosen for its adaptability and light canopy with the ability to allow light into the commercial area. Climbers are also proposed for this area for additional vertical greening.

Green roofs:

81. Extensive areas of green roofs are proposed to be located at Level 1, Level 2, Level 3, Level 6, Level 8 and on the uppermost Roof Level of the proposed building. The proposed planting has again been chosen to include plants with the ability to thrive on rooftops, ensuring their longevity and reducing ongoing maintenance requirements. In the interest of protecting amenity of surrounding residents, these have not been designed with the intention of providing amenity to users of the hotel or the workspace. Rather these would serve to provide enhanced outlook into and out of the proposed building, increase biodiversity and wildlife habitats, reduce storm water runoff and contribute to improved air quality.

Vertical planting:

82. In order to introduce additional greening onto the site, vertical climbers have been proposed to the eastern elevation. Raised planters for climbers have been included within Levels 3 and 6 and a strained wire support system will be installed for the climbers, which will include an automated irrigation system. An indicative maintenance schedule for the sedum roofs and planters alike has been included within the Landscape strategy which has been submitted as part of this application. A condition to ensure the continual maintenance of the irrigation system as well as that of the vertical planting is recommended by way of condition to ensure its maintenance in perpetuity. The landscape details submitted are considered to be of high quality and appropriate for the development. Conditions to submit final details of the design, materials and planting proposed would be required to be submitted by condition.

Trees

83. Saved policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals. Whilst there are no trees within the red line boundary, one tree is in existence along the New Kent Road footway which lies outside of the application site. The tree does not have TPO and is of no particular merit however, it will be retained. A condition will therefore be imposed to ensure its retention and care throughout the construction process.

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

84. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.
85. Impact of the proposed use:

The re-provision of the A class use B class workspace as well as new hotel

would be compatible with the surrounding land uses along New Kent Road, which are predominantly commercial in nature on the ground floor level. Conditions on opening hours and noise levels from both the proposed uses and the operational equipment have been included on the draft decision notice by recommendation of the Council's Environmental Protection Team.

Overlooking, outlook and daylight:

86. The nearest residential properties are located at Bartholomew Street. The site has been designed to be set back from the boundary with the adjacent terrace for amenity purposes and consideration has been given to the massing of the building for both amenity and heritage significance of the adjacent sites.
87. The properties along the terrace, including 1A, do not include on a side elevation that would be subject to further perpendicular overlooking as a result of the development. The building has been set back further through subsequent discussions with officers) to ensure adequate distances are maintained in order to ensure safeguarding of neighbouring privacy.
88. The eastern elevation has been designed as a predominantly 'closed façade' to ensure that the amenity of nearby residents are protected. At upper levels, starting from the portion of the building that is 6 storeys, the elevations do contain some windows. These have been included to break up the massing of this elevation and to provide additional recessed detailing into the façade, avoiding a monolithic massing using both fenestration and brick detailing. These windows would primarily serve the corridors leading into the rooms, but in some instances also serve as secondary means of light into some the end of corridor hotel rooms. Whilst officers consider that adequate separation distances have been maintained, in the interest in protecting residential amenity and limiting the perception of overlooking, a condition to include frosting or privacy screens to certain windows on the elevation is recommended to be imposed.
89. A 60m m separation distance will be achieved with the Ark Global Academy to the hotel façade and 32m with the 2 storey co worker element (although it must be noted that these do not contain any openings). Officers are satisfied that this will ensure no significant overlooking and the proposed layout of the building orientates the building away from the main school area.

Daylight and sunlight impacts

Daylight

90. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
91. The BRE sets out the rationale for testing the daylight impacts of new development through various test, the two most commonly used are the Vertical Sky Component Test (VSC) and the Daylight Distribution (DD) test (otherwise known as the No Sky Line (NSL) test). The VSC test calculates the availability of daylight to the outside of a window and the DD test shows the distribution of daylight within a room. As this is a non-residential accommodation, no criteria for DD testing had been required.
92. The first is the Vertical Sky Component test (VSC) 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 principle elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable. If the VSC with the new development is therefore less than 27% and/or less than 0.8 times its former value then the reduction in light to the window is likely to be noticeable.

93. The following properties have been assessed as part of the daylight and sunlight assessment:

- 1A Bartholomew Street
- 1 Bartholomew Street
- 3 Bartholomew Street
- Ark Global Academy
- 9 Deverell Street
- Driscoll House

1A Bartholomew Street

This is a newly constructed 3 storey residential dwelling addition to the end of the terrace and is the building that shares the closest relationship to the application site. The flank wall on the western elevation contains no windows. All other windows on the buildings have been assessed and the results demonstrate that none of the windows will not be adversely affected and will still receive acceptable levels of daylight. Of the 3 windows tested, 1 would meet the target figure recommended by the BRE and the other would achieve a VSC of at least 0.8% of the existing value.

1 Bartholomew Street

This building again has no windows on the western elevation that look directly onto the application site. The results demonstrate that the existing windows will not be adversely affected and will still receive acceptable levels of daylight. Of the 6 windows tested, 4 would meet the target figure recommended by the BRE and the other 2 would achieve a VSC of at least 0.8% of the existing value.

3 Bartholomew Street

The last dwelling along the terrace that has been tested is No. 3 Bartholomew Street. As all the windows would achieve a VSC of higher than 27% it is therefore is the last building on the terrace to be tested as all other dwellings would achieve a value that is equal or greater than the results at no.3.

Ark Globe Academy

Although not residential windows, the daylight/Sunlight assessment report also tested the windows on the Educational premise that could be potentially affected by the development on the southern elevation. The results demonstrate that of the 10 windows tested, 5 would meet the target figure recommended by the BRE and the other would achieve a VSC of at least 0.8% of the existing value, and it is therefore considered that adequate levels of daylight will be maintained.

9 Deverall St

To the northwest of the site is 9 Deverall St. which is a 3-4 storey residential property located to the north east of the application site. The preliminary

assessment demonstrated that all windows tested passed the 25 degree line test and therefore have been excluded from the detailed assessment with the BRE guidance.

Driscoll House

The last building tested is Driscoll House, where the 5 windows concerned have been tested and the results of which demonstrate that the 5 windows would achieve a VSC higher than 27% and therefore the application is not considered to be adversely impacted by the proposed development.

Sunlight

94. The BRE sunlight test is the Annual Probable Sunlight Hours (APSH) and the Winter Probable Sunlight Hours (WPSH) tests. The APSH assessment is carried out when there is an obstruction within the 25 degree line and the window is facing within 90 degrees due South. The APSH states that a room should receive at least:

- 25% of annual probable sunlight hours (APSH) throughout the year;
- 5% of annual probable sunlight hours during the winter months;
- Not less than 80% of its former sunlight hours during either period;
- Not more than a 4% reduction in sunlight received over the whole year (APSH).

A total of 10 windows from the surrounding buildings have been identified as facing the development and within 90 degrees due South. These belong to the Ark Globe Academy and whilst would not serve residential habitable rooms, have still been subject to the APSH tests. The analysis indicates that all the windows tested would satisfy the BRE criteria for sunlight. Five of the windows passed the 25 degree initial test and the remaining 5 have an APSH greater than 25% and WPSH greater than 5% or at least 0.8 of their former existing value. Therefore, the sunlight impacts would be of negligible significance.

Overshadowing

95. A Solar Access Analysis has been undertaken for the 14 amenity spaces that are in closest proximity to the proposed development. BRE guidelines advises that at least half of the area tested should receive at least 2 hours of sunlight on 21st March – if the area which can receive two hours of sun on 21st March is less than 0.8 times its former value, the loss of sunlight is likely to be noticeable. The analysis demonstrates that the development would have minimal impact on 11 of the 14 amenity spaces tested whilst the remaining three amenity spaces, at numbers 1, 2 and 3 Bartholomew St, would fall short of the BRE target.
96. It should be noted that this is not simply as a result of the development - the resulting daylight/sunlight conditions are further exacerbated due to the orientation of the properties having north facing gardens and self-casting shadows as well as well as low levels of sunlight currently received. As such any development is expected to lead to reductions. The results of the daylight/sunlight assessment of the development at 1A Bartholomew Street states that only a very small area of the ground floor amenity space would receive any light, falling short of BRE guidelines in its existing condition. The main amenity space on the roof however, which is the primary amenity space for the dwelling, would receive more than 2 hours of sunlight on 100% of its area

under the proposed conditions as demonstrated through the transient overshadowing images. The proposed development is therefore not considered to have significant impact on this building. The development of 1A further reduced the existing condition of the garden at 1 Bartholomew St which has resulted in no.1 also falling below BRE guidelines in its existing condition.

97. The transient overshadowing diagram and assessment provided also demonstrates that the Primary recreation area of the school and the Multi Use Games area will not experience any overshadowing as a result of the proposal. Similarly, no overshadowing would occur to the only designated Open Space in the immediate vicinity, Paragon Gardens, which is situated south of the application site across the dual carriageway.

Conclusions on daylight/sunlight and overshadowing

98. In summary, in relation to daylight, of the 31 windows tested, 5 passed the initial 25 degree line test. 22 of the remaining 26 achieved VSCs greater than 27% and the four remaining windows achieved relative VSCs over 0.8 of their former values. Overall, this is considered to be acceptable and does not result in the unacceptable loss of daylight.

In terms of sunlight, 5 of the 10 windows tested passed the 25-degree line test and the remaining 5 would satisfy the BRE criteria for APSH and WPSH. The application is therefore not considered to have a noticeable impact on sunlight.

99. Finally, in relation to overshadowing whilst 11 of the 14 amenity spaces tested would meet BRE guidelines, the remaining three would fall below of the recommended BRE targets. A certain degree of flexibility needs to be applied to BRE guidelines when considering dense urban environments, particularly as these are guidelines. Paragraph 123 of the NPPF (2019) states that: "Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)." Given the existing condition and that these would only fall slightly short of BRE guidelines, officers are satisfied that the impacts are on balance found acceptable

Transport

100. Saved Policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; Policy 5.3 requires the needs of pedestrians and cyclists to be considered and Policy 5.6 establishes maximum parking standards. Strategic Policy 2 of the Core Strategy encourages walking, cycling and the use of public transport rather than travel by car.
101. The site has a PTAL (public transport accessibility level) of 6b (excellent) and is located in a controlled parking zone (CPZ). It is located within 750m equidistantly between Borough station and of the Elephant Castle Rail and underground stations. The Elephant and Castle station is served by the Bakerloo and Northern Underground Lines and National Rail services. New Kent Road provides connections onto Quietway 1 which provides a good quality cycle link to Waterloo and Greenwich. The nearest bus stop is located just south of the application site

on New Kent Road. Given the excellent accessibility to public transport, it is considered to be an appropriate location for more intensive mixed-use development.

Existing site layout

102. The existing movement into the site would remain largely the same with servicing taking place to the rear of the site via Theobald Street. The application would propose improvements to the pedestrian footway with the setting back of the building to provide additional space for pedestrian movements along this important arterial road. The building now proposing active ground floor uses, it is expected to generate additional pedestrian footfall in addition to the footfall from along New Kent Road as an important arterial route. Given the location, this additional footfall is not considered to be detrimental to the public highway and on the contrary being a benefit to the aspirations for a vibrant town centre.

Trip Generation

103. A Trip Generation Assessment has been undertaken to the existing and proposed developments to understand the potential impacts on the highway and public transport. Once built and fully occupied, the estimated vehicular trip generation would be 22 additional vehicular movements a day of which 6-8 Vehicles throughout the day for operational deliveries which is broken down as follows:
 - For the commercial element and given the specific nature of the use proposed; the development is likely to generate 1-2 vehicle moments associated with deliveries.
 - For the hotel element; 5-6 vehicles associated with deliveries and 4 taxi/private hire vehicles in the AM and 5 in the PM.
 - Given the extent of the retail element and offer, it is unlikely to generate a significant amount of deliveries per day. The deliveries resulting for the A class uses have been accounted for within the 'Commercial' element of the scheme.
104. The existing site, if fully occupied, has the potential to generate approximately 14 - 15 two way vehicles movements in the AM and PM periods – based on the trip generation Assessment, the proposals are unlikely to generate levels of vehicular activity that is far greater than of the existing levels at peak periods.

Public Transport Impacts

105. As the development is proposed to be car-free with the exception of the taxi drop off area and the disabled parking bay, it is estimated that the majority of the trips will be undertaken by public transportation, by foot or by cycle. The level of activity and the number of public transportation modes available, including the works to the Elephant and Castle ticket hall to increase capacity, it is not expected to have any impacts on the public transport network and can be absorbed into the existing and planned capacity. This was confirmed by TfL in their representation.

Servicing and delivery

106. Access for servicing will remain as existing from Theobald Street. Off-street

servicing is proposed to the rear of the site, within the shared covered servicing yard. Theobald Street is a no through road with limited vehicular activity and as there is no pedestrian entrance associated with the school from Theobald Street, this is not considered to generate any conflict with pedestrians.

107. The development would be car free with the exception 1 taxi drop off area and space for 1 disabled parking bay which would be accommodated within the service yard. The yard is large enough to accommodate an 11m Rigid HGV and an 11m Refuse vehicle and allows for sufficient space for on-site manoeuvring, allowing vehicles to enter in and exit in forward gear. The accompanying Travel Assessment (TA) and swept path analysis demonstrates the functioning of the space is adequate enough to accommodate all the uses anticipated for both the commercial and the hotel elements. The TA details, for deliveries associated to the hotel, the development is likely to generate 5-6 vehicles per day and a further 1-2 deliveries for the commercial element, generating a total vehicular trip generation of 6-8 delivery related trips per day. Refuse storage has been provided at ground floor level for the hotel and commercial uses which would amount to 15 x 1,100l Eurobins within a secured bin storage area.
108. Transport for London (TfL) have raised as an issue within their representation, the size of the operational yard and the quantity of uses proposed and potential impact on the highway as a result of spill out. As a response to this concern, a draft Service Yard and Management Plan has been submitted. This proposes a management strategy of the service yard and to demonstrate how the space could function and appropriately managed through an adequate management plan. It is proposed that the yard space management plan would include specific delivery hours for each use, including refuse, details of the provision of an on-site goods manager and an online booking system. This is recommended to be secured via legal agreement.

Taxis

109. The applicant's consultants have estimated the taxi movements that the hotel is anticipated to generate. These are predicted to generate 4 and 5 taxi/private hire vehicles in the am and pm periods respectively. The proposed scheme would introduce a dedicated taxi drop off bay to the rear of the site and given the trips likely to be generated by this mode of transportation, the provision made for to accommodate the trips by taxi are considered to be sufficient in capacity terms to sustain the anticipated demand from this application.

Coaches

110. A number of comments, including that from Transport for London (TfL), have raised within their representation concerns in relation to coaches, small and large. The proposed hotel is not expected to necessitate coach parking as the nature of the proposed hotel at a mid-scale offer and is not anticipated to generate this need. However, as an operator has not been appointed to date, a condition to restrict the use of coaches is recommended. A further condition is also recommended which will require the operator to state this within all marketing statements.

Cycle Parking

111. The proposed development would generate the requirement for 25 short stay cycle parking spaces (based on the London Plan calculation of 1x space per 90

sqm for the B class offer and 1 space per 20 bedrooms for the C1 portion). In regards to long stay, the application would be required to provide 1 space per 500 sqm for the B class offer and 1 space per 50 bedrooms. This would generate the requirement for and 7 long stay spaces.

112. In accordance with draft New London Plan policy cycle parking requirements, 34 cycle parking spaces would be provided. These are proposed to be located within secure covered storage areas to the rear of the service yard and within the worker/maker space, which would satisfy Saved Southwark Plan Policy 5.3 for cycle parking to be convenient, secure and weatherproof. In addition to the above cycle parking requirements, TFL have sought a contribution towards the provision of infrastructure for their cycle hire scheme as referred to in their representation. A contribution of £70,000 is therefore required, which is to be secured within the S106 Legal Agreement.

Buses

113. As detailed above, the site has convenient access to public transport including good links to existing bus services. The closest bus stops are located on New Kent Road directly south of the application site which provides bus links. The borough has an agreement with TfL those contributions to improve bus services will need to be made in the Opportunity Area and in particular along the Old Kent Road to accommodate the demand generated by the developments in advance of the opening of the planned extension of the Bakerloo Line. Whilst the application site is not located along the Old Kent Road, the cumulative impacts of schemes across the opportunity area must be considered. The methodology used in other schemes thus far has been the application of £2,700 per unit. Given the non-residential nature of this scheme a different methodology is to be applied and contributions have been calculated using a standard ratio of bedrooms/ units conversion. This would equate to a total contribution of £180,000 for improvements to the bus network and is to be secured in the legal agreement.

DSP bond

114. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor-space. As this development proposes a hotel, the methodology applied to arrive to the proposed DSP bond has been aforementioned ratio, the total figure of which has been included in the table below. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:

- 1) Necessary to make the development acceptable in planning terms;
- 2) Directly related to the development; and
- 3) Fairly and reasonably related in scale and kind to the development.

The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial uses, quarterly for a period of 2 years from first occupancy. If the site meets or better its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £6,969.96 based on application of the aforementioned methodology to the 200 bedrooms as well as the £100/500sqm for all other floorspace proposed as part of this application. The applicant has agreed to the contribution which can be collected via the S106 legal agreement.

Table: DSP Bond calculation

Use	SQM	£
Hotel	5,642 (200 bedrooms)	6,666.67
Commercial	1,354	270.8
Café	162	32.4
Total	1515 (+200 bedrooms)	£6,969.9

Energy and sustainability

115. 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. 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. The commercial elements (Hotel and worker space) of the proposal would be expected to achieve a 35% reduction against part L of the Building Regulations 2010. An Energy Statement and a Sustainability Statement have been provided based on the Mayor's Hierarchy set out within Policy 5.2 of the London Plan.

Be Lean (use less energy)

116. 'Be lean' refers to the approach taken by the design team to maximise the positive aspects of the scheme's passive design to minimise the base energy demand of the buildings. As part of this application, key passive ('Be Lean') design features include:
- The specification of a higher performing building fabric and improved airtightness to reduce heat loss and will reduce the developments required heating energy;
 - Using mechanical ventilation with heat recovery (MVHR);

- The availability of daylight within the hotel bedrooms has been balanced with the overheating risk that solar gains can present; and
- The use of in built fins provides effective solar shading during summer but retains opportunity for useful winter passive solar gain when the sun is lower in the sky.

These passive and active energy efficiency measures listed above satisfy the 'Be Lean' criterion of the hierarchy.

Be Clean

117. The proposed design maximises energy efficiency and follows principles of good active system design. Given the location and current availability of connection into the existing district heating system, no savings are achieved within this segment of the energy hierarchy at present given the lack of existing infrastructure. The building has been designed to be easily connected to and take advantage of a potential district heating system. This would be required by the Section 106 Agreement.

Be Green

118. To satisfy the 'Be green' criterion of the energy hierarchy, photovoltaic Panels (PV panels) and air source heat pumps (ASHPs) have been introduced. The introduction of PVs and the ASHPs into the development would contribute to a reduction of CO2 emissions by a further 27.6%. The ASHPs would provide heating as well as hot water to the entire development and has the ability to provide comfort cooling for thermal comfort to users of the building in the warmer months.

Conclusion:

119. Taking all the on-site measures proposed, a cumulative carbon savings of 35.1% on site would be achieved which would meet the London Plan Policy for non-residential developments to achieve 35% reductions in CO2 emissions (against a Building Regulations (Part L 2013) compliant scheme. There is potential for greater savings but given that a hotel operator has not been appointed, the calculations have been based on moderate assumptions. The applicant has proposed a communal heat pump system which has the ability to be retrofitted to allow for a future connection to a district heating network should this be available in the future. This will ensure greater energy savings and a clause will be included within the S106 Legal Agreement to secure this.

Overheating

120. Policy 5.0 of the London Plan 'overheating and Cooling' states that major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate that this in accordance with the cooling hierarchy. This policy seeks to reduce the impact of the urban heat island effect and excessive heat generation
121. In order to demonstrate compliance, the proposals would integrate active and passive design in the design, material, construction and operation of the development in order to mitigate potential overheating risks and demand for active cooling measures. In accordance with policy, the proposed development

would:

- Minimise internal heat gains through energy efficient design: this will include high efficiency air source heat pumps with all heat sources and pipe work sufficiently insulated to avoid excess heat transfer into internal spaces. This will also include the use of energy efficient fixtures and lighting to further limit the amount of internal heat gains and in reducing overall energy demand.
- Reducing the amount of heat entering the building in summer months: this has been achieved through balancing the aperture size to allow for sufficient light whilst reducing solar heat gains. Internal blinds and glazing with low transmittance will also be installed where required to provide additional reductions in solar gains.
- Utilisation of thermal mass and high ceilings – within buildings and during peak summer periods, this will allow for excess heat store and release, reducing temperature peaks.
- Ventilation: mechanical ventilation with heat recovery will be used in the entirety of the scheme as the primary strategy. Hotel rooms have been designed with passive ventilation systems as secondary strategy.

BREEAM

122. Strategic Policy 13 of the Core Strategy requires commercial units to achieve BREEAM 'excellent'. A sustainability report has been submitted which demonstrates that the proposed development would achieve BREEAM Excellent for both the co-worker element as well as the hotel element of the scheme. This would be policy compliant and a condition to secure this is therefore recommended.

Ecology and biodiversity

123. A biodiversity survey and report has been submitted which has been reviewed by the Council's ecologist. As detailed within the report the site has been identified as one of low ecological value and negligible potential to support all notable and/or protected species besides low potential to support nesting birds.
124. By recommendation of the Council's biodiversity officer, the inclusion of 4 Sparrow boxes and 6 Swift Bricks to be internally set onto the walls is recommended to be secured by condition. The extensive landscaping plans and enhancement features proposed including those proposed to be secured by condition, would result in a biodiversity net gain within this site, in accordance with London Plan policy and Saved Southwark Plan policies.

Air quality

125. Southwark Plan Policy 3.6, Air Quality, states that planning permission will not be granted for development that would "lead to a reduction in air quality." London Plan (2016) Policy 7.14 states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality. The site is located in an Air Quality Management Area and an Air Quality Assessment has been submitted, which considers the air quality impacts arising both from the construction and operation of the proposed development.

126. The Air Quality Assessment undertaken found that releases of dust and Particulate Matter (PM10) are likely to occur during site activities. It also identified that through good site practice and the implementation of suitable mitigation measures, the effect of dust and PM10 releases may be mitigated to where the effects are considered to be negligible. This will be secured through the Construction Management Plan (CEMP) required by the Section 106 Agreement.
127. The development is proposed to be car free with the exception of delivery and drop-off related activities which expected to generate 29 vehicular movements a day. This is considered to be unlikely to affect local air quality. Dispersion modelling has also been undertaken to predict concentrations of NO₂, PM10 and PM2.5 to determine whether any mitigation measures would be required to protect future occupants. As the proposed use of the site is wholly commercial, no issues are raised as to long term exposure. However, a ventilation strategy has been submitted which details out strategies for the mitigation of short term air quality as in terms of NO₂, the assessment indicates that an exceedance of the annual mean air quality objective is likely. This is largely attributed to the existing poor air quality rather than a result of the development. As Air Source Heat Pumps are proposed for heating the development is Air Quality neutral in respect of building-related emissions.

Noise and Vibration

128. An environmental noise and impact assessment has been submitted and recommendations presented to ensure that occupiers and users of the proposed development do not suffer a loss of amenity due to noise nuisance or excess noise from activities within the building and from surrounding uses. This considers potential noise transfer between the hotel and the commercial element, the hotel and external environmental noise and the noise emitted through the plant equipment. Whilst the accommodation portion is not for residential uses, this mitigation strategy proposed would satisfy the policy of quality accommodation and can be secured through an appropriately worded condition. The Environmental Protection team have reviewed the documents and recommend the wording of these conditions.

Secured by design

129. The applicant and LBS officers have met with officers of the Metropolitan Police, to review the design of the scheme and allow for appropriate security measures to be incorporated into the development and development design. The representation received by the Metropolitan Police confirms that the design of the development has considered opportunities for natural surveillance and excellent line of sites which are crime prevention measures. The representation states that it is possible for this application to obtain secured by design accreditation and as such a condition is recommended to be attached required that the applicant achieve secured by design accreditation.
130. In their representation, the MET police raised the following two issues. The first relates to clarity in relation to the service yard and concerns around the potential for anti-social behaviour. In response the concerns raised, the applicant has agreed that the service yard will be fully enclosed. A security fence is proposed to extend along the western boundary and the entrance secured by a roller shutter. The roller shutter is proposed to be remote operated by the hotel staff and the onsite yard manager. Further details of the service yard, including those of

pertaining to the security and operation of the roller shutter is proposed to be included within the Service Yard Management Plan which is to be secured via legal agreement.

131. The second concern is in relation to the compartmentalisation of uses. The agent has confirmed that the hotel access can be controlled by a fob system as to ensure that the hotel is only accessible by guests and staff. The café/restaurant is proposed to be used by both the hotels users, users of the co-working space and visitors and as such a deliberate fluidity in the approach of the design of the ground floor layout has been sought. Officers consider the approach to be one of the positive elements of the scheme and that this can be efficiently managed by on site personnel.

Ground conditions and contamination

132. A Land contamination Assessment Desk Report has been submitted which provides an assessment of the potential for contamination at this site. This also includes a preliminary UXO Risk Assessment to understand the likelihood of encountering UXO below the site. The report concludes that it is considered to be low risk in respect of finding contamination that would require remedial works. Therefore it is considered that there will be no risk to ground surface waters, ecology or wildlife as a result.

Water resources and flood risk

133. The site is located in Flood Zone 3 which is defined as having a 'high probability' of river and sea flooding and accordingly the applicant has submitted a Flood Risk Assessment. The Environment Agency have been consulted on the application and have not raised any objections subject to proposals and have recommended conditions.
134. In addition to the green roofs having the abilities to slow down runoff rates, the sustainability statement provided details a site specific Sustainable Urban Drainage System (SUDs) based on the existing geology and urban context of the area. The proposed SUDs system comprises of 115m² of permeable paving system with 900mm deep geo-cellular attenuation storage with capacity of 98 cubic meters, which would be capable of accommodating the required storage capacity to meet the runoff rates which have been calculated to be 2l/s from an existing 16.8l/s representing a substantial betterment. This will manage onsite runoff rates at a rate mimicking infiltration and storage capacities of semi-natural devices such as trenches, swales and ponds.
135. Further to the flow control system, the proposed SUDs strategy also proposes an attenuation system utilises biological and mechanical filtration system which has the ability to remove any particulate matter and pollutant before its release into the local system. The post development area has been used to determine the volume required to meet the runoff target for storm events up to 1:100 year (plus climate change) event. The application would reduce surface water runoff rates by 88% (when compared to the existing on site condition) after the implementation of SUDs exceeding the 50% requirement of the Southwark Core Strategy. The inclusion would replace the 1,580 sqm of currently hardstanding area on the site which includes the building, which takes about 50% of the site, and the parking space to the rear forming the remainder of the site.

136. As the site falls within the Old Kent Road Regeneration area, development must achieve greenfield runoff rates, or pay a financial contribution. The application is very close to meeting Greenfield Runoff rates and the flood and drainage team have requested that the applicant undertake further investigations into meeting greenfield runoff rates (the greenfield runoff rate is a just below 0.1L/s whilst the application proposes a runoff rate of 0.2L/s). The follow up work concluded that it would not be recommended as it could result in blockages to the system as there would be insufficient flow to flush out any potential residue caught up within the system. This was reviewed by the Councils Flood Risk Team and proposed discharge rate was subsequently agreed.
137. As schemes in the Old Kent Road must achieve greenfield runoff rates, or pay a financial contribution, a financial contribution sought. This will be secured through the Section 106 Legal Agreement at a charge of £365 per cubic metre that it falls short of, as well as a detailed design of the proposed SUDs system. It is also recommended that conditions requiring a SUDs maintenance plan as well as an emergency Flood evacuation plan is submitted to and is approved in writing by the planning authority prior to the occupation of the site. This should specify appropriate access and egress routes for all users and/or safe areas of refuge on upper levels.

Archaeology

138. The site lies within an Archaeological Priority Zone (APZ), and when the New Southwark Plan is adopted the site will lie within the North Southwark and Roman Roads Tier 1 Archaeological Priority Area (APA). Saved Policy 3.19 of the Southwark Plan (2007) requires that applications for development in APAs should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report (the results of trial trenching on the site).
139. The applicant has submitted a desk based assessment with this application and an archaeological evaluation works on the site has also been undertaken. The works were undertaken to a very high standard by MoLA and were monitored on site by the Council's Archaeology Officer.
140. The small scale evaluation revealed that very little archaeological material were present in the area excavated. However, as recommended in the archaeological evaluation report a small -scale watching brief (targeted on those parts of the site not evaluated) should take place during construction groundworks, as a safeguarding measure. This is recommended to be secured by condition by recommendation of the Council's Archaeological Officer.

Planning obligations (S.106 undertaking or agreement)

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Affordable workspace	Co working space at no more than 25% of local market rate for 10% of the B1 net	Agreed

provision	internal floorspace.	
Transport and Highways		
Highway works	<p>Repave the footways including new kerbing fronting the development on Theobald Street using materials in accordance with Southwark's Streetscape Design Manual - SSDM (precast concrete slabs and 150mm wide granite kerbs).</p> <ul style="list-style-type: none"> • Construct the vehicle crossover on Theobald Street to current SSDM standards. • Reinstate the redundant vehicle crossover on Theobald Street as footway. • Construct a raised table at the junction of Theobald Street junction with New Kent Road. • Repair any damages to the highway due to construction activities for the development including construction work and the movement of construction vehicles. 	Agreed
Bus contributions	£180,000	Agreed
Delivery service plan bond	£6,969.9	Agreed
Cycle club scheme	£70,000	Agreed
Energy, Sustainability and the Environment		
Connection to (or futureproofing for connection to) district CHP	Provision to be secured in the S106	Agreed
Greenfield runoff	Provision to be secured in the S106	Agreed

rates		
Administration fee	Payment to cover the costs of monitoring these necessary planning obligations calculated as 2% of total sum.	Agreed

141. In addition to the financial contributions set out above, the following other provisions would be secured:

- Workspace Specification
- Construction phase jobs, short courses and apprenticeships or Employment and Training contribution
- Highway works – Section 278 Agreements
- Connection to a future District Heating System (SELCHP)
- Final Demolition and Construction Environment Management Plans
- Construction Logistics Management Plan
- Yardspace management plan
- Delivery and Servicing Management Plan

142. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.

143. In the event that a satisfactory legal agreement has not been entered into by 15 December 2020, it is recommended that the director of planning refuses 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 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 (2015) and the Planning Obligations and Community Infrastructure levy SPD (2015).”

Mayoral and borough community infrastructure levy (CIL)

144. Section 143 of the Localism Act states that any financial contribution received as “community infrastructure Levy” (CIL) is a material consideration. However, the weight attached is determined by the decision maker. The mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark’s CIL will provide for infrastructure that supports growth in Southwark.

145. In this instance it is an estimated CIL payment of approximately £967,232.00 and an estimated Southwark CIL payment of £426,720 would be required.

Summary of neighbour consultation

146. 17 Consultation responses were received of which 15 objected to the proposal and which detailed the following material concerns:

- The proposed height and scale of development

- Proximity to the Ark Global Academy
- Overprovision of hotel in the area
- Impact on the highway, including on coaches and large busses as well as the impact of deliveries to the front of the building and on neighbouring amenity
- Impact on the listed terrace
- Objection to the inclusion of the A class use on waste and littering.
- Impact on the local pub
- Loss of light to the listed terrace and to the gardens of the terrace
- Objection to the communal roof amenity
- Loss of outlook
- Overlooking
- Concerns about maintaining the B class floorspace
- Impacts on the foundations of the adjacent buildings
- Impacts on air quality
- Overprovision of food premises and impact on the school
- Comment on the use of brick
- Location of the entrances

These have been addressed in detail in the main body of this report.

Community impact and equalities assessment

147. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
148. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
149. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:
 1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
 2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
 3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

150. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

Human rights implications

151. 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.
152. This application has the legitimate aim of providing a new mixed use building with hotel, workspace and café uses. 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.

Positive and proactive statement

153. The Council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
154. The Council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table	
Was the pre-application service used for this application?	
If the pre-application service was used for this application, was the advice given followed?	Yes
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No

Other matters

155. N/A

Conclusion

156. The major redevelopment of the site is supported and welcomed in principle. The introduction of a hotel use on this site is considered to be acceptable in principle as it would not result in an overprovision of hotels in the area and would create an increase in overall employment floorspace density in a modern building. Whilst the application does not provide full reprovision of the commercial floorspace, the 20sqm shortfall is considered on balance to be acceptable for reasons discussed in the main body of this officer report. The proposal would also have some A class uses on the ground floor which would activate the frontage along New Kent Road. The proposed mix of uses would contribute to the vibrancy of the area and which would be complemented by a high quality building.
157. Whilst part of the proposed building would be slightly taller than the buildings immediately adjacent, the overall scale of the development is considered to be acceptable within this location and has been designed to be of high quality and to respond to its immediate context. The proposal would not result in any significant daylight, sunlight, outlook or overlooking impacts on the surrounding residential properties. The architectural design is considered to be of the highest quality, and any harm to the setting of the surrounding listed buildings is considered to be outweighed by the major regeneration benefits of the proposal.
158. It is therefore recommended that planning permission be granted, subject to conditions and the agreement of a S106 Legal Agreement under the terms as set out above.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: Application file: 19/AP/5389 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing 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 5535 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken and replies received
Appendix 2	Draft decision notice
Appendix 3	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning		
Report Author	Alicia Chaumard, Planning Officer		
Version	Final		
Dated	27 May 2020		
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 Leisure		No	No
Strategic Director of Housing and Modernisation		No	No
Director of Regeneration		No	No
Date final report sent to Constitutional Team			28 May 2020

APPENDIX 1**Consultation undertaken****Site notice date:** 03.10.2019**Press notice date:** 14.11.2019**Case officer site visit date:** 03.10.2019**Neighbour consultation letters sent:** 07.10.2019**Internal services consulted**

LBS Planning Policy Team
 LBS Ecology
 LBS Local Economy
 LBS Environmental Protection Team
 LBS Highways Development and Management
 LBS Highways Licensing
 LBS Flood Risk Management & Urban Drainage Team
 LBS Transport Policy Team
 LBS Urban Forester
 LBS Waste Management Team
 LBS Archaeologist

Statutory and non-statutory organisations

Transport For London
 Thames Water
 EDF Energy
 Historic England - Scheduled Ancient Monuments
 Environment Agency
 London Fire & Emergency Planning Authority
 London Underground
 Natural England - London Region & South East Region
 Network Rail
 Metropolitan Police Service

LIST OF CONSULTATIONS AND NOTIFICATIONS FOR PLANNING APPLICATION 19/AP/5389

The Occupier 13 Bartholomew St, London, SE1 4AJ
 The Occupier 20 Dawkins Court, 2 Garland Close, London
 The Occupier 11 Bartholomew st, London, SE1 4AJ
 The Occupier 21 Jonson House, Burge Street, Lawson estate
 The Occupier 21 John Maurice Close, London, SE17 1PZ
 The Occupier 17 John Maurice Close, London, SE17 1PZ
 The Occupier Flat 4, 11 John Maurice Close, London
 The Occupier Flat 3, 11 John Maurice Close, London
 The Occupier Flat 5, 11 John Maurice Close, London
 The Occupier 16 John Maurice Close, London, SE17 1PZ
 The Occupier Flat 6, 11 John Maurice Close, London
 The Occupier Flat 1, 81 Balfour Street, London
 The Occupier 89A Chatham Street, London, SE17 1PA
 The Occupier 83F Chatham Street, London, SE17 1PA
 The Occupier 89B Chatham Street, London, SE17 1PA
 The Occupier 89E Chatham Street, London, SE17 1PA
 The Occupier 89D Chatham Street, London, SE17 1PA
 The Occupier 83E Chatham Street, London, SE17 1PA

The Occupier 75F Chatham Street, London, SE17 1PA
 The Occupier 75E Chatham Street, London, SE17 1PA
 The Occupier 83A Chatham Street, London, SE17 1PA
 The Occupier 83D Chatham Street, London, SE17 1PA
 The Occupier 83B Chatham Street, London, SE17 1PA
 The Occupier 89F Chatham Street, London, SE17 1PA
 The Occupier Flat H, 85 Balfour Street, London
 The Occupier Flat G, 85 Balfour Street, London
 The Occupier Flat 1, 75 Balfour Street, London
 The Occupier Flat 1, 79 Balfour Street, London
 The Occupier Flat D, 85 Balfour Street, London
 The Occupier Flat 5, 9 John Maurice Close, London
 The Occupier Flat 4, 9 John Maurice Close, London
 The Occupier Flat 6, 9 John Maurice Close, London
 The Occupier Flat 8, 9 John Maurice Close, London
 The Occupier Flat 7, 9 John Maurice Close, London
 The Occupier Flat 3, 9 John Maurice Close, London
 The Occupier Flat 15, 8 John Maurice Close, London
 The Occupier Flat 14, 8 John Maurice Close, London
 The Occupier Flat 16, 8 John Maurice Close, London
 The Occupier Flat 2, 9 John Maurice Close, London
 The Occupier Flat 1, 9 John Maurice Close, London
 The Occupier Flat 1, 10 John Maurice Close, London
 The Occupier 30 John Maurice Close, London, SE17 1PZ
 The Occupier 29 John Maurice Close, London, SE17 1PZ
 The Occupier 31 John Maurice Close, London, SE17 1PZ
 The Occupier 33 John Maurice Close, London, SE17 1PZ
 The Occupier 32 John Maurice Close, London, SE17 1PZ
 The Occupier 21 Jonson House, Burge Street, Lawson Estate
 The Occupier 28 John Maurice Close, London, SE17 1PZ
 The Occupier Flat 3, 10 John Maurice Close, London
 The Occupier Flat 2, 10 John Maurice Close, London
 The Occupier Flat 4, 10 John Maurice Close, London
 The Occupier Flat 6, 10 John Maurice Close, London
 The Occupier Flat 5, 10 John Maurice Close, London
 The Occupier Flat 13, 8 John Maurice Close, London
 The Occupier Flat 3, 7 John Maurice Close, London
 The Occupier Flat 2, 7 John Maurice Close, London
 The Occupier Flat 4, 7 John Maurice Close, London
 The Occupier Flat 6, 7 John Maurice Close, London
 The Occupier Flat 5, 7 John Maurice Close, London
 The Occupier Flat 1, 7 John Maurice Close, London
 The Occupier 24 John Maurice Close, London, SE17 1PZ
 The Occupier 23 John Maurice Close, London, SE17 1PZ
 The Occupier 25 John Maurice Close, London, SE17 1PZ
 The Occupier 27 John Maurice Close, London, SE17 1PZ
 The Occupier 26 John Maurice Close, London, SE17 1PZ
 The Occupier Flat 1, 8 John Maurice Close, London
 The Occupier Flat 9, 8 John Maurice Close, London
 The Occupier Flat 8, 8 John Maurice Close, London
 The Occupier Flat 10, 8 John Maurice Close, London
 The Occupier Flat 12, 8 John Maurice Close, London
 The Occupier Flat 11, 8 John Maurice Close, London
 The Occupier 17 Bartholomew Street, London, SE1 4AJ
 The Occupier 15 Bartholomew Street, London, SE1 4AJ
 The Occupier 19 Bartholomew Street, London, SE1 4AJ
 The Occupier 5 Bartholomew Street, London, SE1 4AJ
 The Occupier 3 Bartholomew Street, London, SE1 4AJ
 The Occupier 13 Bartholomew Street, London, SE1 4AJ
 The Occupier 1A Bartholomew Street, London, SE1 4AJ

The Occupier St Saviours And St Olaves C Of E Secondary School, New Kent Road, London
 The Occupier 1 Bartholomew Street, London, SE1 4AJ
 The Occupier 7 Bartholomew Street, London, SE1 4AJ
 The Occupier 37 Bartholomew Street, London, SE1 4AL
 The Occupier 31 Bartholomew Street, London, SE1 4AL
 The Occupier 39 Bartholomew Street, London, SE1 4AL
 The Occupier 43 Bartholomew Street, London, SE1 4AL
 The Occupier 41 Bartholomew Street, London, SE1 4AL
 The Occupier 29 Bartholomew Street, London, SE1 4AL
 The Occupier The Beehive, 21 Bartholomew Street, London
 The Occupier 9 Bartholomew Street, London, SE1 4AJ
 The Occupier 23 Bartholomew Street, London, SE1 4AL
 The Occupier 27 Bartholomew Street, London, SE1 4AL
 The Occupier 25 Bartholomew Street, London, SE1 4AL
 The Occupier 6B John Maurice Close, London, SE17 1PY
 The Occupier Flat 1, 76 County Street, London
 The Occupier Flat 3, 76 County Street, London
 The Occupier Flat 2, 76 County Street, London
 The Occupier 6A John Maurice Close, London, SE17 1PY
 The Occupier 83 County Street, London, SE1 4AD
 The Occupier Ground Floor Yard, 65-69 County Street, London
 The Occupier 81 County Street, London, SE1 4AD
 The Occupier 87 County Street, London, SE1 4AD
 The Occupier 85 County Street, London, SE1 4AD
 The Occupier Flat 4, 76 County Street, London
 The Occupier Flat 6, 76 County Street, London
 The Occupier Flat 5, 76 County Street, London
 The Occupier Flat 7, 76 County Street, London
 The Occupier 128 Great Dover Street, London, SE1 4EE
 The Occupier 126 Great Dover Street, London, SE1 4EE
 The Occupier 130 Great Dover Street, London, SE1 4EE
 The Occupier 2 Cardinal Bourne Street, London, SE1 4EJ
 The Occupier 1 Cardinal Bourne Street, London, SE1 4EJ
 The Occupier 124 Great Dover Street, London, SE1 4EE
 The Occupier 116 Great Dover Street, London, SE1 4EE
 The Occupier 114 Great Dover Street, London, SE1 4EE
 The Occupier Flat 1, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 11, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 13, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 12, Kempe House Lawson Estate, Burge Street
 The Occupier 9 Cardinal Bourne Street, London, SE1 4EJ
 The Occupier 5 Cardinal Bourne Street, London, SE1 4EJ
 The Occupier 4 Cardinal Bourne Street, London, SE1 4EJ
 The Occupier 6 Cardinal Bourne Street, London, SE1 4EJ
 The Occupier 8 Cardinal Bourne Street, London, SE1 4EJ
 The Occupier 7 Cardinal Bourne Street, London, SE1 4EJ
 The Occupier 112 Great Dover Street, London, SE1 4EE
 The Occupier 59 Bartholomew Street, London, SE1 4AL
 The Occupier 57 Bartholomew Street, London, SE1 4AL
 The Occupier 61 Bartholomew Street, London, SE1 4AL
 The Occupier 65 Bartholomew Street, London, SE1 4AL
 The Occupier 63 Bartholomew Street, London, SE1 4AL
 The Occupier 55 Bartholomew Street, London, SE1 4AL
 The Occupier 47 Bartholomew Street, London, SE1 4AL
 The Occupier 45 Bartholomew Street, London, SE1 4AL
 The Occupier 49 Bartholomew Street, London, SE1 4AL
 The Occupier 53 Bartholomew Street, London, SE1 4AL
 The Occupier 51 Bartholomew Street, London, SE1 4AL
 The Occupier 67 Bartholomew Street, London, SE1 4AL
 The Occupier 104 Great Dover Street, London, SE1 4EE

The Occupier 102 Great Dover Street, London, SE1 4EE
 The Occupier 106 Great Dover Street, London, SE1 4EE
 The Occupier 110 Great Dover Street, London, SE1 4EE
 The Occupier 108 Great Dover Street, London, SE1 4EE
 The Occupier 2 Burge Street, London, SE1 4EL
 The Occupier 1 Burge Street, London, SE1 4EL
 The Occupier 3 Burge Street, London, SE1 4EL
 The Occupier 177 New Kent Road, London, SE1 4AG
 The Occupier 4 Burge Street, London, SE1 4EL
 The Occupier Flat B, 173 New Kent Road, London
 The Occupier Flat A, 173 New Kent Road, London
 The Occupier 1 Baytree Mews, London, SE17 1PU
 The Occupier 3 Baytree Mews, London, SE17 1PU
 The Occupier 2 Baytree Mews, London, SE17 1PU
 The Occupier 52A Searles Road, London, SE1 4YL
 The Occupier First Floor And Second Floor Flat, 173 New Kent Road, London
 The Occupier Ground Floor Left And First Floor, 136-142 New Kent Road, London
 The Occupier 4 Baytree Mews, London, SE17 1PU
 The Occupier First Floor Flat, 154 New Kent Road, London
 The Occupier Ground Floor Flat, 154 New Kent Road, London
 The Occupier 5 Baytree Mews, London, SE17 1PU
 The Occupier 7 Baytree Mews, London, SE17 1PU
 The Occupier Ground Floor Right, 136-142 New Kent Road, London
 The Occupier 8 Baytree Mews, London, SE17 1PU
 The Occupier Flat 8, 93-95 Balfour Street, London
 The Occupier 173 New Kent Road, London, SE1 4AG
 The Occupier Flat 4, 93-95 Balfour Street, London
 The Occupier Flat 3, 93-95 Balfour Street, London
 The Occupier Flat 5, 93-95 Balfour Street, London
 The Occupier Flat 7, 93-95 Balfour Street, London
 The Occupier Flat 6, 93-95 Balfour Street, London
 The Occupier Flat 2, 93-95 Balfour Street, London
 The Occupier School House, St Saviours And St Olaves C Of E Secondary School, New Kent Road
 The Occupier Flat 1, 93-95 Balfour Street, London
 The Occupier 70 Henshaw Street, London, Se17 1pd
 The Occupier 7 Bartholomew Street, Borough, London
 The Occupier Ground Floor And Mezzanine Floor, 74-75 County Street, London
 The Occupier Flat 1, 73 County Street, London
 The Occupier Flat 3, 73 County Street, London
 The Occupier Flat 2, 73 County Street, London
 The Occupier Ground Floor Flat, 177 New Kent Road, London
 The Occupier Flat 1, 177 New Kent Road, London
 The Occupier Unit 1 To Unit 4, 221 New Kent Road, London
 The Occupier Flat 2, 177 New Kent Road, London
 The Occupier Flat Top Floor, 177 New Kent Road, London
 The Occupier Flat 3, 177 New Kent Road, London
 The Occupier Flat 4, 73 County Street, London
 The Occupier Ground Floor Unit 3, 65-69 County Street, London
 The Occupier Ground Floor Unit 2, 65-69 County Street, London
 The Occupier Ground Floor Unit 4, 65-69 County Street, London
 The Occupier Ground Floor Unit 6, 65-69 County Street, London
 The Occupier First Floor Unit 5, 65-69 County Street, London
 The Occupier Ground Floor Unit 1, 65-69 County Street, London
 The Occupier Flat 6, 73 County Street, London
 The Occupier Flat 5, 73 County Street, London
 The Occupier Flat 2, 71 County Street, London
 The Occupier Flat 1, 71 County Street, London
 The Occupier Living Accommodation, The Beehive, 21 Bartholomew Street
 The Occupier Living Accommodation, 183 New Kent Road, London

The Occupier Flat 2, 12 Searles Road, London
 The Occupier Living Accommodation, 161 New Kent Road, London
 The Occupier Flat 14, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 4, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 3, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 21, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 20, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 22, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 24, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 23, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 8, Alleyn House Lawson Estate, Burbage Close
 The Occupier 168 New Kent Road, London, SE1 4YS
 The Occupier 166 New Kent Road, London, SE1 4YS
 The Occupier 170 New Kent Road, London, SE1 4YS
 The Occupier 10 Searles Road, London, SE1 4YU
 The Occupier 1 Searles Road, London, SE1 4YU
 The Occupier 162 New Kent Road, London, SE1 4YS
 The Occupier Flat 9, Alleyn House Lawson Estate, Burbage Close
 The Occupier 156 New Kent Road, London, SE1 4YS
 The Occupier 160 New Kent Road, London, SE1 4YS
 The Occupier 158 New Kent Road, London, SE1 4YS
 The Occupier Flat 2, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 5, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 42, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 6, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 8, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 7, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 41, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 38, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 37, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 39, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 40, Nashe House Lawson Estate, Burbage Close
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 The Occupier Flat 4, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 9, Nashe House Lawson Estate, Burbage Close
 The Occupier 17 Bartholomew Street, Southwark, London
 The Occupier 1A, BARTHOLOMEW STREET, LONDON
 The Occupier Flat 16, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 15, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 17, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 19, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 18, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 14, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 10, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 1, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 11, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 13, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 12, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 21, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 23, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 25, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 24, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 20, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 5, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 7, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 9, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 8, Beeston House Lawson Estate, Burbage Close
 The Occupier 7 Bartholomew St, London, SE1 4AJ
 The Occupier Flat 36, 239 Long Lane, London

The Occupier 6 Henshaw Street, London, SE17 1PD
 The Occupier 62 Henshaw Street, London, SE17 1PD
 The Occupier 60 Henshaw Street, London, SE17 1PD
 The Occupier 54 Henshaw Street, London, SE17 1PD
 The Occupier 46 Henshaw Street, London, SE17 1PD
 The Occupier 44 Henshaw Street, London, SE17 1PD
 The Occupier 48 Henshaw Street, London, SE17 1PD
 The Occupier 52 Henshaw Street, London, SE17 1PD
 The Occupier 50 Henshaw Street, London, SE17 1PD
 The Occupier 64 Henshaw Street, London, SE17 1PD
 The Occupier 8 Henshaw Street, London, SE17 1PD
 The Occupier 80 Henshaw Street, London, SE17 1PD
 The Occupier 11 Henshaw Street, London, SE17 1PE
 The Occupier 82 Henshaw Street, London, SE17 1PD
 The Occupier 76 Henshaw Street, London, SE17 1PD
 The Occupier 68 Henshaw Street, London, SE17 1PD
 The Occupier 66 Henshaw Street, London, SE17 1PD
 The Occupier 70 Henshaw Street, London, SE17 1PD
 The Occupier 74 Henshaw Street, London, SE17 1PD
 The Occupier 72 Henshaw Street, London, SE17 1PD
 The Occupier 42 Henshaw Street, London, SE17 1PD
 The Occupier 12 Henshaw Street, London, SE17 1PD
 The Occupier 10 Henshaw Street, London, SE17 1PD
 The Occupier 14 Henshaw Street, London, SE17 1PD
 The Occupier 18 Henshaw Street, London, SE17 1PD
 The Occupier 16 Henshaw Street, London, SE17 1PD
 The Occupier 93 Balfour Street, London, SE17 1PB
 The Occupier 99 Chatham Street, London, SE17 1PA
 The Occupier 97 Chatham Street, London, SE17 1PA
 The Occupier 89 Balfour Street, London, SE17 1PB
 The Occupier 20 Henshaw Street, London, SE17 1PD
 The Occupier 36 Henshaw Street, London, SE17 1PD
 The Occupier 34 Henshaw Street, London, SE17 1PD
 The Occupier 38 Henshaw Street, London, SE17 1PD
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 The Occupier 40 Henshaw Street, London, SE17 1PD
 The Occupier 4 Henshaw Street, London, SE17 1PD
 The Occupier 32 Henshaw Street, London, SE17 1PD
 The Occupier 24 Henshaw Street, London, SE17 1PD
 The Occupier 22 Henshaw Street, London, SE17 1PD
 The Occupier Flat 4, 70 Searles road, London
 The Occupier 195 New Kent Road, New Kent Road, London
 The Occupier 26 Henshaw Street, London, SE17 1PD
 The Occupier 30 Henshaw Street, London, SE17 1PD
 The Occupier 28 Henshaw Street, London, SE17 1PD
 The Occupier 73 Henshaw Street, London, SE17 1PE
 The Occupier 71 Henshaw Street, London, SE17 1PE
 The Occupier 69 Henshaw Street, London, SE17 1PE
 The Occupier 67 Henshaw Street, London, SE17 1PE
 The Occupier 81 Henshaw Street, London, SE17 1PE
 The Occupier 67E Chatham Street, London, SE17 1PA
 The Occupier 67D Chatham Street, London, SE17 1PA
 The Occupier 67F Chatham Street, London, SE17 1PA
 The Occupier 75B Chatham Street, London, SE17 1PA
 The Occupier 75A Chatham Street, London, SE17 1PA
 The Occupier 67B Chatham Street, London, SE17 1PA
 The Occupier Flat A, 69 Balfour Street, London
 The Occupier 9 Henshaw Street, London, SE17 1PE
 The Occupier Flat 1, 71 Balfour Street, London

The Occupier 67A Chatham Street, London, SE17 1PA
 The Occupier Flat 1, 73 Balfour Street, London
 The Occupier 59 Henshaw Street, London, SE17 1PE
 The Occupier 27 Henshaw Street, London, SE17 1PE
 The Occupier 25 Henshaw Street, London, SE17 1PE
 The Occupier 29 Henshaw Street, London, SE17 1PE
 The Occupier 33 Henshaw Street, London, SE17 1PE
 The Occupier 31 Henshaw Street, London, SE17 1PE
 The Occupier 23 Henshaw Street, London, SE17 1PE
 The Occupier 15 Henshaw Street, London, SE17 1PE
 The Occupier 13 Henshaw Street, London, SE17 1PE
 The Occupier 17 Henshaw Street, London, SE17 1PE
 The Occupier 21 Henshaw Street, London, SE17 1PE
 The Occupier 19 Henshaw Street, London, SE17 1PE
 The Occupier 35 Henshaw Street, London, SE17 1PE
 The Occupier 51 Henshaw Street, London, SE17 1PE
 The Occupier 49 Henshaw Street, London, SE17 1PE
 The Occupier 53 Henshaw Street, London, SE17 1PE
 The Occupier 57 Henshaw Street, London, SE17 1PE
 The Occupier 55 Henshaw Street, London, SE17 1PE
 The Occupier 47 Henshaw Street, London, SE17 1PE
 The Occupier 39 Henshaw Street, London, SE17 1PE
 The Occupier 37 Henshaw Street, London, SE17 1PE
 The Occupier 41 Henshaw Street, London, SE17 1PE
 The Occupier 45 Henshaw Street, London, SE17 1PE
 The Occupier 43 Henshaw Street, London, SE17 1PE
 The Occupier Flat 6, 43 Searles Road, London
 The Occupier Flat 5, 43 Searles Road, London
 The Occupier Flat 7, 43 Searles Road, London
 The Occupier Flat 9, 43 Searles Road, London
 The Occupier Flat 8, 43 Searles Road, London
 The Occupier Flat 4, 43 Searles Road, London
 The Occupier Flat 19, 43 Searles Road, London
 The Occupier Flat 18, 43 Searles Road, London
 The Occupier Flat 20, 43 Searles Road, London
 The Occupier Flat 22, 43 Searles Road, London
 The Occupier Flat 21, 43 Searles Road, London
 The Occupier Flat 17, 43 Searles Road, London
 The Occupier Flat 12, 43 Searles Road, London
 The Occupier Flat 11, 43 Searles Road, London
 The Occupier Flat 14, 43 Searles Road, London
 The Occupier Flat 16, 43 Searles Road, London
 The Occupier Flat 15, 43 Searles Road, London
 The Occupier 57 Searles Road, London, SE1 4YL
 The Occupier Flat 1, 191 New Kent Road, London
 The Occupier Petrol Filling Station, 197-209 New Kent Road, London
 The Occupier Flat 2, 191 New Kent Road, London
 The Occupier 44 Searles Road, London, SE1 4YL
 The Occupier Flat 3, 191 New Kent Road, London
 The Occupier 179B New Kent Road, London, SE1 4AG
 The Occupier 171 New Kent Road, London, SE1 4AG
 The Occupier 189 New Kent Road, London, SE1 4AG
 The Occupier 195 New Kent Road, London, SE1 4AG
 The Occupier 163 New Kent Road, London, SE1 4AG
 The Occupier 161 New Kent Road, London, SE1 4AG
 The Occupier 45 Searles Road, London, SE1 4YL
 The Occupier 53 Searles Road, London, SE1 4YL
 The Occupier 52 Searles Road, London, SE1 4YL
 The Occupier 54 Searles Road, London, SE1 4YL
 The Occupier 56 Searles Road, London, SE1 4YL

The Occupier 55 Searles Road, London, SE1 4YL
 The Occupier 51 Searles Road, London, SE1 4YL
 The Occupier 47 Searles Road, London, SE1 4YL
 The Occupier 46 Searles Road, London, SE1 4YL
 The Occupier 48 Searles Road, London, SE1 4YL
 The Occupier 50 Searles Road, London, SE1 4YL
 The Occupier 49 Searles Road, London, SE1 4YL
 The Occupier Flat 9, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 8, Edison House Rockingham Estate, New Kent Road
 The Occupier Globe Academy Primary School, Harper Road, London
 The Occupier 101 Chatham Street, London, SE17 1PA
 The Occupier Flat 7, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 3, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 20, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 4, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 17, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 16, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 18, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 2, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 19, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 26, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 33, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 32, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 34, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 36, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 35, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 31, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 28, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 27, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 29, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 30, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 3, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 15, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 19, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 18, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 2, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 3, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 20, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 17, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 13, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 12, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 14, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 16, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 15, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 4, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 11, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 10, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 12, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 14, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 13, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 1, Nashe House Lawson Estate, Burbage Close
 The Occupier Flat 6, Beeston House Lawson Estate, Burbage Close
 The Occupier 21 Jonson House, Burge Street, London
 The Occupier 11 Bartholomew St, London, London
 The Occupier 87 Balfour Street, London, SE17 1PB
 The Occupier Flat 2, 70 Searles Road, London
 The Occupier Flat 1, 70 Searles Road, London
 The Occupier Flat 3, 70 Searles Road, London
 The Occupier Flat 5, 70 Searles Road, London
 The Occupier Flat 15, Middleton House Lawson Estate, Burbage Close

The Occupier Flat 14, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 4, 70 Searles Road, London
 The Occupier Flat B, 20 Searles Road, London
 The Occupier Flat A, 20 Searles Road, London
 The Occupier Flat A, 18 Searles Road, London
 The Occupier Flat B, 15 Searles Road, London
 The Occupier Flat B, 18 Searles Road, London
 The Occupier Flat B, 16 Searles Road, London
 The Occupier Flat 6, 70 Searles Road, London
 The Occupier 157 New Kent Road, London, SE1 4AG
 The Occupier 183 New Kent Road, London, SE1 4AG
 The Occupier 65-69 County Street, London, SE1 4AD
 The Occupier 33 Bartholomew Street, London, SE1 4AL
 The Occupier 175 New Kent Road, London, SE1 4AG
 The Occupier 193 New Kent Road, London, SE1 4AG
 The Occupier Flat 8, 70 Searles Road, London
 The Occupier Flat 7, 70 Searles Road, London
 The Occupier Flat 9, 70 Searles Road, London
 The Occupier 172 New Kent Road, London, SE1 4YT
 The Occupier 179 New Kent Road, London, SE1 4AG
 The Occupier Flat A, 16 Searles Road, London
 The Occupier 21 Searles Road, London, SE1 4YU
 The Occupier 2 Searles Road, London, SE1 4YU
 The Occupier 22 Searles Road, London, SE1 4YU
 The Occupier 23 Searles Road, London, SE1 4YU
 The Occupier 19 Searles Road, London, SE1 4YU
 The Occupier 12 Searles Road, London, SE1 4YU
 The Occupier 11 Searles Road, London, SE1 4YU
 The Occupier 13 Searles Road, London, SE1 4YU
 The Occupier 17 Searles Road, London, SE1 4YU
 The Occupier 14 Searles Road, London, SE1 4YU
 The Occupier 25 Searles Road, London, SE1 4YU
 The Occupier 9 Searles Road, London, SE1 4YU
 The Occupier 74-75 County Street, London, SE1 4AD
 The Occupier Flat A, 15 Searles Road, London
 The Occupier 7 Searles Road, London, SE1 4YU
 The Occupier 3 Searles Road, London, SE1 4YU
 The Occupier 26 Searles Road, London, SE1 4YU
 The Occupier 4 Searles Road, London, SE1 4YU
 The Occupier 6 Searles Road, London, SE1 4YU
 The Occupier 5 Searles Road, London, SE1 4YU
 The Occupier Flat 20, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 2, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 21, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 23, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 22, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 19, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 16, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 18, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 17, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 24, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 9, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 8, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 1, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 11, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 10, Beeston House Lawson Estate, Burbage Close
 The Occupier Flat 7, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 3, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 25, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 4, Middleton House Lawson Estate, Burbage Close

The Occupier Flat 6, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 5, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 13, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 21, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 20, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 22, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 24, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 23, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 2, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 16, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 15, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 17, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 19, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 18, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 25, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 1, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 9, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 10, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 12, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 11, Middleton House Lawson Estate, Burbage Close
 The Occupier Flat 8, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 4, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 3, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 5, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 7, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 6, Kempe House Lawson Estate, Burge Street
 The Occupier Flat 22, Nashe House Lawson Estate, Burbage Close
 The Occupier 1 Bartholomew Street, London, Se14aj
 The Occupier Flat 6, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 5, Edison House Rockingham Estate, New Kent Road
 The Occupier 103 Chatham Street, London, SE17 1PA
 The Occupier 61 Chatham Street, London, SE17 1PA
 The Occupier 59 Chatham Street, London, SE17 1PA
 The Occupier 63 Chatham Street, London, SE17 1PA
 The Occupier 73 Balfour Street, London, SE17 1PL
 The Occupier Driscoll House, New Kent Road, London
 The Occupier 75 Balfour Street, London, SE17 1PL
 The Occupier 175A New Kent Road, London, SE1 4AG
 The Occupier Flat 1, 165-169 New Kent Road, London
 The Occupier First Floor And Second Floor Flat, 24 Searles Road, London
 The Occupier Ground Floor Flat, 8 Searles Road, London
 The Occupier 78A Henshaw Street, London, SE17 1PD
 The Occupier Second Floor Flat, 189 New Kent Road, London
 The Occupier 191 New Kent Road, London, SE1 4AG
 The Occupier Ground Floor, 165-167 New Kent Road, London
 The Occupier 78-80 County Street, London, SE1 4AE
 The Occupier Flat 1, 77 Balfour Street, London
 The Occupier Flat F, 85 Balfour Street, London
 The Occupier Flat B, 85 Balfour Street, London
 The Occupier Flat A, 85 Balfour Street, London
 The Occupier Flat C, 85 Balfour Street, London
 The Occupier Flat E, 85 Balfour Street, London
 The Occupier Flat 7, 8 John Maurice Close, London
 The Occupier Flat 3, 8 John Maurice Close, London
 The Occupier Flat 2, 8 John Maurice Close, London
 The Occupier Flat 4, 8 John Maurice Close, London
 The Occupier Flat 6, 8 John Maurice Close, London
 The Occupier Flat 5, 8 John Maurice Close, London
 The Occupier 118 Great Dover Street, London, SE1 4EE
 The Occupier 122 Great Dover Street, London, SE1 4EE

The Occupier 120 Great Dover Street, London, SE1 4EE
 The Occupier 3 Cardinal Bourne Street, London, SE1 4EJ
 The Occupier Flat 10, Kempe House Lawson Estate, Burge Street
 The Occupier Second Floor Flat, 154 New Kent Road, London
 The Occupier Flat 1, 12 Searles Road, London
 The Occupier Third Floor Flat, 154 New Kent Road, London
 The Occupier First Floor Flat, 74-75 County Street, London
 The Occupier 6 Baytree Mews, London, SE17 1PU
 The Occupier Flat 5, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 7, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 6, Alleyn House Lawson Estate, Burbage Close
 The Occupier Flat 25, Alleyn House Lawson Estate, Burbage Close
 The Occupier 11 Bartholomew St, London, SE1 4AJ
 The Occupier 58 Henshaw Street, London, SE17 1PD
 The Occupier 56 Henshaw Street, London, SE17 1PD
 The Occupier 75 Henshaw Street, London, SE17 1PE
 The Occupier 79 Henshaw Street, London, SE17 1PE
 The Occupier 77 Henshaw Street, London, SE17 1PE
 The Occupier 7 Henshaw Street, London, SE17 1PE
 The Occupier 63 Henshaw Street, London, SE17 1PE
 The Occupier 61 Henshaw Street, London, SE17 1PE
 The Occupier 65 Henshaw Street, London, SE17 1PE
 The Occupier 59 Searles Road, London, SE1 4YL
 The Occupier 58 Searles Road, London, SE1 4YL
 The Occupier Flat 1, 43 Searles Road, London
 The Occupier Flat 3, 43 Searles Road, London
 The Occupier Flat 2, 43 Searles Road, London
 The Occupier Flat 10, 43 Searles Road, London
 The Occupier 95 Chatham Street, London, SE17 1PA
 The Occupier 46, Henshaw Street, London, SE17 1PD
 The Occupier 93 Chatham Street, London, SE17 1PA
 The Occupier 57 Chatham Street, London, SE17 1PA
 The Occupier 107 Chatham Street, London, SE17 1PA
 The Occupier 105 Chatham Street, London, SE17 1PA
 The Occupier 109 Chatham Street, London, SE17 1PA
 The Occupier 55 Chatham Street, London, SE17 1PA
 The Occupier 111 Chatham Street, London, SE17 1PA
 The Occupier Flat 2, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 32, 43 Searles Road, London
 The Occupier Flat 31, 43 Searles Road, London
 The Occupier Flat 33, 43 Searles Road, London
 The Occupier Ground Floor, 169 New Kent Road, London
 The Occupier 70 County Street, London, SE1 4AD
 The Occupier Flat 30, 43 Searles Road, London
 The Occupier Flat 25, 43 Searles Road, London
 The Occupier Flat 24, 43 Searles Road, London
 The Occupier Flat 26, 43 Searles Road, London
 The Occupier Flat 29, 43 Searles Road, London
 The Occupier Flat 27, 43 Searles Road, London
 The Occupier 164 New Kent Road, London, SE1 4YS
 The Occupier Flat 16, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 15, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 17, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 19, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 18, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 14, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 10, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 1, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 11, Edison House Rockingham Estate, New Kent Road
 The Occupier Flat 13, Edison House Rockingham Estate, New Kent Road

The Occupier Flat 12, Edison House Rockingham Estate, New Kent Road
 The Occupier 75D Chatham Street, London, SE17 1PA
 The Occupier 91A Balfour Street, London, SE17 1PB
 The Occupier 89A Balfour Street, London, SE17 1PB
 The Occupier 91B Balfour Street, London, SE17 1PB
 The Occupier First Floor And Second Floor Flat, 87 Balfour Street, London
 The Occupier 52B Searles Road, London, SE1 4YL
 The Occupier Globe Academy Secondary School, Harper Road, London
 The Occupier Flat 2, 81 Balfour Street, London
 The Occupier Flat C, 69 Balfour Street, London
 The Occupier Flat 1, 171 New Kent Road, London
 The Occupier Flat 2, 171 New Kent Road, London
 The Occupier Flat 3, 171B New Kent Road, London
 The Occupier Flat 2, 165-169 New Kent Road, London
 The Occupier Flat, 191 New Kent Road, London
 The Occupier First Floor Flat, 8 Searles Road, London
 The Occupier First Floor And Second Floor Flat, 185 New Kent Road, London
 The Occupier 78B Henshaw Street, London, SE17 1PD
 The Occupier First Floor Flat, 163 New Kent Road, London
 The Occupier First Floor Flat, 189 New Kent Road, London
 The Occupier Flat B, 69 Balfour Street, London
 The Occupier Flat 5, 14 John Maurice Close, London
 The Occupier Flat 4, 14 John Maurice Close, London
 The Occupier Flat 6, 14 John Maurice Close, London
 The Occupier Flat 8, 14 John Maurice Close, London
 The Occupier Flat 7, 14 John Maurice Close, London
 The Occupier Flat 3, 14 John Maurice Close, London
 The Occupier Flat 2, 13 John Maurice Close, London
 The Occupier Flat 1, 13 John Maurice Close, London
 The Occupier Flat 3, 13 John Maurice Close, London
 The Occupier Flat 2, 14 John Maurice Close, London
 The Occupier Flat 1, 14 John Maurice Close, London
 The Occupier Flat 9, 14 John Maurice Close, London
 The Occupier Flat 2, 77 Balfour Street, London
 The Occupier Flat 2, 79 Balfour Street, London
 The Occupier 83A Balfour Street, SE17 1PL,
 The Occupier Flat 2, 71 Balfour Street, London
 The Occupier 83B Balfour Street, SE17 1PL,
 The Occupier Flat 6, 15 John Maurice Close, London
 The Occupier Flat 2, 15 John Maurice Close, London
 The Occupier Flat 1, 15 John Maurice Close, London
 The Occupier Flat 3, 15 John Maurice Close, London
 The Occupier Flat 5, 15 John Maurice Close, London
 The Occupier Flat 4, 15 John Maurice Close, London
 The Occupier 179A New Kent Road, London, SE1 4AG
 The Occupier Ground Floor Flat, 185 New Kent Road, London
 The Occupier Ground Floor Flat, 24 Searles Road, London
 The Occupier Flat, 193 New Kent Road, London
 The Occupier Flat 3, 78 Henshaw Street, London
 The Occupier Second Floor Flat, 8 Searles Road, London
 The Occupier Ground Floor Flat, 87 Balfour Street, London
 The Occupier Basement Flat, 154 New Kent Road, London
 The Occupier Flat 3, 165-169 New Kent Road, London
 The Occupier Second Floor Flat, 163 New Kent Road, London
 The Occupier Globe Academy Nursery School, Deverell Street, London
 The Occupier 4 John Maurice Close, London, SE17 1PY
 The Occupier 3 John Maurice Close, London, SE17 1PY
 The Occupier 5 John Maurice Close, London, SE17 1PY
 The Occupier Flat 1, 11 John Maurice Close, London
 The Occupier 6 John Maurice Close, London, SE17 1PY

The Occupier 2 John Maurice Close, London, SE17 1PY
The Occupier 75C Chatham Street, London, SE17 1PA
The Occupier 67C Chatham Street, London, SE17 1PA
The Occupier 83C Chatham Street, London, SE17 1PA
The Occupier 1 John Maurice Close, London, SE17 1PY
The Occupier 89C Chatham Street, London, SE17 1PA
The Occupier Flat 2, 11 John Maurice Close, London
The Occupier 19 John Maurice Close, London, SE17 1PZ
The Occupier 18 John Maurice Close, London, SE17 1PZ
The Occupier 20 John Maurice Close, London, SE17 1PZ
The Occupier 22 John Maurice Close, London, SE17 1PZ

APPENDIX 2**Consultation Responses Received****Internal services**

Archaeological Officer
Ecology Officer
Local Economy Team
Environmental Protection Officer
Flood and Drainage Officer
Urban Forester
Transport Officer
Highways Officer
Ecology Officer

Statutory and non-statutory organisations

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

APPENDIX 3**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	EDEN VALE GLOBAL LTD	Reg. Number	19/AP/ 5389
Application Type	Full Planning Application		
Recommendation	Grant subject to Legal Agreement	Case Number	

Draft of Decision Notice**Planning Permission was GRANTED for the following development:**

Demolition of existing warehouse building and erection of a part 3, part 6 and part 9 storey building providing 200 hotel rooms (Class C1) and 1,354sqm of work/maker space at ground floor (and mezzanine) (Flexible Class B1) as well as ancillary cafe/restaurant and bar facilities (Class A3/A4), along with associated landscaping, servicing yard and access works.

At: 221 NEW KENT ROAD, LONDON SE1

In accordance with application received on 24/05/2019

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

- Site Location Plan (1059 –A001- PL)
- Proposed Ground Floor plan (1069 – A101 –PL)
- Proposed Mezzanine Level (1069 – A102 –PL)
- Proposed Level 01 (1069 – A103 –PL)
- Proposed Level 02 (1069 – A104 –PL)
- Proposed Level 03 (1069 – A105 –PL)
- Proposed Level 04 (1069 – A106 –PL)
- Proposed Level 05 (1069 – A107 –PL)
- Proposed Level 06 (1069 – A108 –PL)
- Proposed Level 07 (1069 – A109 –PL)
- Proposed Level 08 (1069 – A110 –PL)
- Proposed Roof Plan (1069 – A111 –PL)

- Proposed Site Elevations South (1069 – A301 –PL)
- Proposed Site Elevations West (1069 – A302 –PL)
- Proposed Site Elevations North (1069 – A303 –PL)

- Proposed Site Elevations East (1069 – A304 –PL)
- Proposed Building Section 1 (1069 – A201 –PL)
- Proposed Building Section 2 &3 (1069 – A202 –PL)
- Proposed Building Section 4 (1069 – A203 –PL)
- Proposed Building Section 5 (1069 – A204 –PL)
- Area Schedule (1069 – A1001 –PL)
- Design and Access Statement

- Air Quality Assessment – Dated August 2019 – Produced by XCO2
- Daylight, Sunlight and Overshadowing Assessment – Dated August 2019 – Produced by XCO2
- Environmental Noise and Impact Assessment - Dated August 2019 – Produced by XCO2
- Biodiversity Survey and report – Dated April 2019 – Produced by Greenage
- Flood Risk Assessment and SUDs Strategy Dated August 2019 – Produced by XCO2
- Utilities Statement - Dated August 2019 – Produced by XCO2
- Heritage Statement Dated August 2019 – Produced by Savills
- Landscaping and open space statement – Dated August 2019 – Prepared by Davis Landscape Architecture
- Sustainability Statement – Dated August 2019 – Produced by XCO2
- Energy Statement – Dated August 2019 – Produced by XCO2
- Transport assessment – Dated August 2019 – Produced by ttp consulting
- Travel Plan - Dated August 2019 – Produced by ttp consulting
- Archaeological desk-based assessment - Dated September 2019 – Produced by CgMs heritage
- Hotel Assessment - Dated October 2019 – Produced by Savills

Reason

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

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

Reason

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

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

- 3 LAND CONTAMINATION

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority [LPA]) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the LPA.

Reason

There is always the potential for unexpected contamination to be identified during development ground works. The Environment Agency and the Environmental Protection Team should be consulted should any contamination be identified.

4 FOUNDATION DESIGN

Before any work hereby authorised begins, a detailed scheme showing the complete scope and arrangement of the 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

5 ARCHAEOLOGICAL COMPLIANCE CONDITION

- a) During all below grade works (except demolition to ground slab level only) the applicant shall maintain an archaeological watching brief in accordance with an archaeological written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. The below-grade works shall not be carried out otherwise than in accordance with any such approval given.
- b) In the event that archaeological finds or deposits are found at any time when carrying out the approved development that could be deemed to be of national significance, they shall be reported immediately to the Local Planning Authority, and a scheme for their protection, investigation, recording and/or preservation shall be submitted to the Local Planning Authority for approval in writing
- c) Within six months of the completion of the archaeological site works, a report detailing the results of the work, 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

To ensure that the archaeological interest of the site is preserved by record or in situ, that archaeological operations are undertaken to an acceptable standard, and in order to mitigate the impact of the works on the archaeological resource, 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 2019.

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 2019 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 SUDS

No works shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units, details of flow control measures, and hydraulic calculations. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the 'Flood Risk Assessment and SuDS Strategy' prepared by XCO2 (dated 02/04/2019). Where it can be demonstrated that it is not feasible to provide 100% of the attenuation storage volume on site to limit surface water discharges to greenfield runoff rates, an offset payment to the Council will be required to account for the shortfall in attenuation storage. The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason

To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017), Policy 5.13 of the London Plan (2015) and Policy AAP 11 of the Old Kent Road Area Action Plan (2017).

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

9 DETAILS OF MATERIALS

Prior to the commencement of works above grade (excluding demolition), samples of all external facing materials to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved 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 that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework 2019, Policy 7.7 of the London Plan 2016, 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).

10 VENTILATION

Before any A3 or A4 use hereby permitted commences the detailed design of the kitchen extract system, including all emissions abatement equipment and flue, shall be submitted to the local planning

authority for approval.

Reason

In order to ensure that that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building 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.

11 BAT AND SWIFT BOXES

Details of bird and/or bat nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority prior to any above grade works of the application hereby granted permission. No less than 6 bat tubes and 6 swift bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained. The nesting tubes / bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

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.

12 DETAILS OF PRIVACY SCREEN/GLAZING

Prior to the commencement of above grade work, details of obscure glazing / privacy screens 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, with the obscure glazing / privacy screens provided prior the occupation by the operator and retained as such thereafter.

Reason

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

13 SPRINKLERS

Prior to the commencement of any above grade works (excluding demolition), full particulars of the sprinkler system to be used within the ground floor units shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with

any approval given.

Reason

To ensure that there is an adequate level of fire safety within this mixed use development.

14 HARD AND SOFT LANDSCAPING

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

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: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2019; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and conservation) and 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design) 3.13 (Urban Design) and 3.28 (Biodiversity) of the Southwark Plan 2007.

15 CONSTRUCTION LOGISTICS PLAN

Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall identify all efficiency and sustainability measures that will be taken during construction of this development. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority. Further information and guidance is available at <http://content.tfl.gov.uk/constructionlogistics-plan-guidance-for-developers.pdf>

Reason

To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14 and to minimise the impact of construction activities on local

air quality in accordance with London Plan Policy 7.14.

16 STREET AND DRAINAGE GULLIES

Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies. Please contact Hernan Castano, Highway Development Manager on 020 7525 4706 or Hernan.castano@southwark.gov.uk to arrange.

Reason

To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14.

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.

17 BREEAM CERTIFICATION

Prior to any fit out works to the commercial premises hereby authorised begins, 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 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.

ii) Before the first occupation of the commercial use within the development 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 have been met.

Reason

To ensure the proposal complies with The National Planning Policy Framework 2019, 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.

18 LANDSCAPE MANAGEMENT PLAN

Before the first occupation of the building hereby permitted, a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas, shall be submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be

agreed in writing by the local planning authority.

Reason

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. This is a mandatory criterion of BREEAM (LE5) to monitor long term impact on biodiversity; a requirement is to produce a Landscape and Habitat Management Plan.

19 CYCLE STORAGE

Before the first occupation of the building/extension the cycle storage facilities as shown on 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 2019, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007

20 EMERGENCY FLOOD WARNING AND EVACUATION PLAN

Before the first occupation of the building/extension the cycle storage facilities as shown on 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 2019, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007

21 RESTRICTION ON COACHES

Before the marketing of the development to hotel occupiers, details to ensure the promotion of Coach free occupation is clear to the occupiers of the development hereby permitted.

Reason

To ensure compliance with Strategic Policy 2 Sustainable Transport of the Core Strategy 2011, and

Saved Policy 5.2 Transport Impacts of the Southwark Plan 2007.

22 INTERNAL VENTILATION IN AREA OF POOR QUALITY

The use hereby permitted shall not be begun until a scheme for the internal ventilation for the development, with appropriately located plant, inlets and outlets, and treatment or actions to reduce NO2 levels, has been proposed.

Reason

In order that the ventilation, ducting, filtration/treatment and ancillary equipment is incorporated as an integral part of the development in the interests of residential 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.

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.

23 ENERGY EFFICIENCY TO BE IN ACCORDANCE WITH ENERGY MEASURES

The development hereby permitted shall be constructed to include the energy efficiency measures and photovoltaic panels as stated in the Sustainability Statement submitted in support of the application. All measures and technologies shall remain for as long as the development is occupied.

Reason

To ensure the development complies with the National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy and Policy 5.7 Renewable Energy of the London Plan 2016

24 VERTICAL SOUND TRANSMISSION – INTERNAL NOISE STANDARDS

The rooms within the development sharing a party ceiling or floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 when measured as an L10 across any 5 minute period.

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.

25 GREEN ROOFS FOR BIODIVERSITY

Before any above grade work hereby authorised begins, details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) 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.

Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and Southwark Council agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

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 (Green Infrastructure: the Multifunctional Network of Green and Open Spaces), 5.3 (Sustainable Design and Construction), 5.10 (Urban Greening) and 5.11 (Green Roofs and Development Site Environs) of the London Plan 2016; Strategic Policy 11 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

26 PILING

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason

The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable

risk is posed to Controlled Waters.

27 CONTAMINATED LAND – FURTHER FINDINGS

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority [LPA]) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the LPA.

Reason

There is always the potential for unexpected contamination to be identified during development ground works. The Environment Agency and the Environmental Protection Team should be consulted should any contamination be identified.

28 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. Furthermore, the plant Specific 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 in full 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).

29 SERVICING

Any deliveries, unloading and loading shall only be between the following hours:

- 07:00 to 22:00 on Monday to Fridays,
- 09:00 to 20:00 Saturdays
- 10:00 to 16:00 on Sundays and Bank Holidays.

Reason

To safeguard the amenity 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

30 HOURS OF USE – A CLASS CONDITION

The hotel restaurant/Cafe shall close to non guests at 00:00 on Monday to Saturday and 23:00 on Sunday and Bank Holidays.

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.

31 AIR QUALITY

The development hereby permitted shall be carried out in accordance with the 'Air Quality Assessment' [dated August 2019 produced by XCO2], and the mitigation measures it recommends, unless otherwise agreed in writing by the Local Planning Authority.

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 nearby activities, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

32 FINISHED FLOOR LEVELS

The first floor finished floor level must be set no lower than 3.41mAOD metres above Ordnance Datum (mAOD). Environment Agency 3rd Floor, Seacole Building, 2 Marsham Street, London, SW1P 4DF
Telephone: 03708 506 506 Email: enquiries@environment-agency.gov.uk Website: www.gov.uk/environment-agency

Reason

To reduce the risk of flooding to the development and occupants. The first floor is the lowest floor level that will have sleeping accommodation, according to the submitted documentation.

33 RESTRICTION ON THE INSTALLATION OF APPURTENANCES ON THE ELEVATIONS

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

Reason

To ensure such works do not detract from the appearance of the building (s) in accordance with: the National Planning Policy Framework 2019; 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.

34 RESTRICTION ON THE INSTATEMENT OF ROOF PLANT AND OTHER ROOF STRUCTURES

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

Reason

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

35 WHEELCHAIR ACCESSIBLE HOTEL ROOMS

Of the 200 hotel bedrooms hereby approved, 10% (a minimum of 20 rooms) shall be wheelchair accessible and be provided in the locations shown on the following approved drawings and made available from first occupation, and retained as such for as long as the building is in use.

Reason:

To ensure the provision of adequate means of access to the building for people with disabilities in accordance with: Policy 7.2 (An Inclusive Environment) of the London Plan 2016, Policy 7.7 (Hotel and Visitor Accommodation) of the London Plan 2016.

Informative notes to the applicant relating to the proposed development

THAMES WATER

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed

development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in

line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

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Tel: 020 7525 7187/7420**OPEN**

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