

Item No. 5.1	Classification: Open	Date: 13 January 2015	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 14/AP/2948 for: Full Planning Permission Address: 240 AND 252 CAMBERWELL ROAD, LONDON SE5 0DP Proposal: Demolition of existing buildings and the partial retention and conversion of the existing warehouse in association with the redevelopment of the site to provide buildings ranging from 2 to 9 storeys in height comprising 164 residential units (Use Class C3), 1,775 sqm of flexible commercial / community floorspace (Classes A1/B1/D) together with associated car parking, cycle parking, open space, landscaping and infrastructure works.		
Ward(s) or groups affected:	Camberwell Green		
From:	Head of Development Management		
Application start date: 04/08/2014		Application expiry date: 03/11/2014	
Earliest decision date: 25/09/2014		Planning performance agreement date: 13/02/2015	

RECOMMENDATION

- 1 a) That the planning committee resolve to grant planning permission subject to conditions, the applicant first entering into a satisfactory legal agreement and subject to referral to the Mayor of London (GLA).
- b) In the event that the legal agreement is not entered into by 13 February 2015, that the head of development management be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 146 of this report.

BACKGROUND INFORMATION

Site location and description

- 2 The site is located on the western side of Camberwell Road and is broadly rectangular in shape. It has frontages onto Camberwell Road and Blucher Road, which is pedestrianised at this point, and extends behind numbers 242 to 252 Camberwell Road. It contains a number of buildings in light industrial use which range from two to four storeys in height, most of which are in use associated with the production of theatre props and scenery. There is vehicular access directly from Camberwell Road and parking and servicing areas within the site, and the site area is 0.75ha.
- 3 The surrounding buildings comprise a mix of commercial and residential uses and there is a grade II listed former cinema, now in use as the House of Praise church, to the south-west. The Nags Head public house adjoins the access road into the site and there is a railway viaduct close to the western boundary.

Details of proposal

- 4 Full planning permission is sought to redevelop the site to provide a mixed-use development comprising 164 residential units and 1,775 sqm of commercial floorspace comprising five flexible units which could be used for A1 (retail), B1 (business) or D1 (non-residential institution) purposes and a further ten workshop units falling within use class B1. All but one of the existing buildings on the site would be demolished, with the remaining building to be extended and converted. The existing vehicular access from Camberwell Road would be retained and would become a shared pedestrian / cyclists and vehicle access leading to two courtyards within which the new buildings would sit. There would be an access road at the rear of numbers 242 to 252 Camberwell Road leading to eight accessible parking spaces, and a new pedestrian access onto Blucher Road. The proposed buildings would range from two to nine storeys in height as follows:
- 5 Block A - This block would have frontages to Camberwell Road and Blucher Road and would be 6-storeys high fronting Camberwell Road, stepping down to 5-storeys along the Blucher Road frontage. It would contain 9 commercial units on the ground floor ranging from 56sqm to 160sqm with associated refuse storage, cycle parking, an electricity sub-station and four accessible parking spaces. At first floor level there would be 185sqm of additional workshop space forming an upper floor to one of the ground floor units, with affordable housing units on the remainder of this floor. The remaining upper floors would be occupied by residential accommodation and in total there would be 33 flats within this building.
- 6 Block B - This would be a 5-storey building occupying an L-shaped footprint which would sit behind the existing terrace formed by numbers 242-252 Camberwell Road. It would contain 35 flats and there would be associated refuse storage and cycle parking on the ground floor.
- 7 Block C - This block would be located on the western part of the site, running parallel with the railway viaduct. It would contain 70 flats and would be a maximum of 9-storeys high with a maximum height of 27m high (30.7m above ordnance datum). Dedicated refuse storage and cycle parking for this block would be provided on the ground floor, together with a plant room.
- 8 Block D - This is an existing 3-storey plus basement 1930s warehouse located on the north-western corner of the site fronting Blucher Road and the viaduct. It would be extended and converted with two additional floors and new balconies added. At basement and ground floor level it would contain 5 commercial units ranging from 76sqm to 172 sqm together with plant space, and there would be 25 flats on the upper floors. It would be connected to block A with a 2-storey bridge element containing habitable accommodation, although there would be no internal connection between the two buildings.
- 9 Block E - This would be a small 2-storey building located at the rear of 244-246 Camberwell Road which would provide 74.4sqm of workshop space. There is currently a building in this location and the proposed new building would be lower and would occupy a smaller footprint.
- 10 252 Camberwell Road – This part of the site is currently occupied by a single-storey building set back from the road. From the street metal garage doors and a dropped kerb access are visible and the building sits behind this. It was last used as a centre to support people suffering from substance abuse problems and is now vacant. The existing structure would be demolished and a 3-storey building would be erected attached to the existing terrace and would comprise 62sqm of commercial space on the ground floor and a maisonette above.

- 11 The new buildings would be clad with brick and re-constituted stone, with zinc cladding to the top floors of blocks A, D and parts of blocks B and C. Aluminium windows, metal mesh screens and glazed and metal balcony balustrades are proposed, together with green and brown roofs.

Amendments

- 12 A number of amendments have been made to the proposals during the course of the application, the most significant being amendments to the massing of block A to pull its upper floors 1.5m further back from Blucher Road and the removal of a flat at 8th floor level in block C to reduce the massing. There have been alterations to some of the unit layouts and balconies, additional fenestration provided to block B, alterations to the elevational treatments, the provision of glass canopies to a number of the residential entrance, the inclusion of D1 space within the development and the omission of three live / work units from block A and replacement with three additional flats. The affordable housing within the development has been increased from 23 per cent to 33.8 per cent and the proportion of 3+ bed units increased from 17 per cent to 20 per cent.

Relevant planning history

- 13 252 Camberwell Road

03/AP/1361 Application type: Full Planning Permission

Change of use from Office/Light Industrial [within Class B1 Business Use] to a community drugs project office and meeting rooms [within Class D1 Non Residential Institution] together with the erection of a single storey glazed extension to the front of the building.

Decision date 03/09/2003 16:18:06 Decision: Grant

240 and 252 Camberwell Road

14/AP/1773 Application type: Screening Opinion

Formal EIA Screening Opinion for redevelopment of the site comprising up to 2,500sqm of non-residential floorspace (Use Classes A1/B1 and live/work units), up to 170 residential units, parking and amenity space.

Decision date 07/07/2014 Decision: Screening Opinion - EIA Regs (SCR) EIA not required.

- 14 Pre-application advice was provided in advance of this application, the details of which are held electronically by the local planning authority. A number of meetings have been held with the applicant prior to the submission of this application. Discussions centred around the layout, height, scale and massing of the development, the replacement commercial floorspace, impact upon neighbouring properties, the quality of accommodation to be provided and transport impacts.

Planning history of adjoining sites

- 15 244 to 246 Camberwell Road

11-AP-0135 - Change of use from five self-contained flats (Use Class C3) to an 18 bedroom guest house (Use Class C1) and enlargement of two windows at first and second floor level in the south elevation of the building. Planning permission was refused on 12/04/2011 owing to the loss of residential accommodation. An appeal was

subsequently lodged and was dismissed (reference: APP/A5840/A/11/2152473).

254 to 268 Camberwell Road

11-AP-3181 - Change of use from Use Class D2 (bingo and social club) to Use Class D1 (place of worship) and Use Class D2 (assembly and leisure) (part retrospective).

Planning permission was granted following the completion of a legal agreement on 28/02/2012 and has been implemented.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 16 The main issues to be considered in respect of this application are:
- a) Principle of the proposed development in terms of land use
 - b) Environmental impact assessment
 - c) Density
 - d) Affordable housing
 - e) Housing mix
 - f) Quality of accommodation
 - g) Wheelchair accessible housing
 - h) Impact of proposed development on amenity of existing occupiers
 - i) Transport issues
 - j) Design and setting of adjacent listed buildings
 - k) Trees and landscaping
 - l) Archaeology
 - m) Planning obligations (S.106 undertaking or agreement)
 - n) Mayoral Community Infrastructure levy
 - o) Sustainable development implications
 - p) Ecology
 - q) Contaminated land
 - r) Air quality
 - s) Flooding
 - t) Statement of community involvement

Planning policy

- 17 The site is subject to the following designations on the proposals map:
- urban density zone
 - Camberwell action area
 - ward requiring 35 per cent affordable and 35 per cent private housing.

National Planning Policy Framework (the framework)

Section 1 - Building a strong, competitive economy

Section 4 - Promoting sustainable transport

Section 6 - Delivering a wide choice of high quality homes

Section 7 - Requiring good design

Section 8 - Promoting healthy communities

Section 10 - Meeting the challenge of climate change, flooding and coastal change

Section 11 - Conserving and enhancing the natural environment

Section 12 - Conserving and enhancing the historic environment

Planning practice guidance

London Plan July 2011 consolidated with revised early minor alterations October 2013

Policy 3.3 Increasing housing supply

Policy 3.8	Housing choice	
Policy 3.13	Affordable housing thresholds	
Policy 3.16	Protection and enhancement of social infrastructure	
Policy 4.2	Offices	
Policy 4.3	Mixed use development and offices	
Policy 4.4	Managing industrial land and premises	
Policy 4.6	Support for and enhancement of arts, culture, sport and entertainment provision	
Policy 5.7	Renewable energy	
Policy 5.8	Innovative energy technologies	
Policy 6.10	Walking	
Policy 6.13	Parking	
Policy 7.2	An inclusive environment	
Policy 7.6	Architecture	
Policy 7.21	Trees and woodlands	

Core Strategy 2011

- Strategic policy 1 - Sustainable development
- Strategic policy 2 - Sustainable transport
- Strategic policy 3 - Shopping, leisure and entertainment
- Strategic policy 4 - Places for learning, enjoyment and healthy lifestyles
- Strategic policy 5 - Providing new homes
- Strategic policy 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

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

- 1.4 - Employment sites outside the preferred office locations and preferred industrial locations
- 1.5 – Small business units
- 2.1 - Enhancement of community facilities
- 2.5 - Planning obligations
- 3.2 - Protection of amenity
- 3.3 - Sustainability assessment
- 3.4 - Energy efficiency
- 3.6 - Air quality
- 3.7 - Waste reduction
- 3.9 - Water
- 3.11 - Efficient use of land
- 3.12 - Quality in design
- 3.13 - Urban design
- 3.14 - Designing out crime
- 3.18 - Setting of listed buildings, conservation areas and world heritage sites
- 3.19 - Archaeology

- 320 - Tall buildings
- 3.28 - Biodiversity
- 4.2 - Quality of residential accommodation
- 4.3 - Mix of dwellings
- 4.4 - Affordable housing
- 4.5 - Wheelchair affordable housing
- 5.2 - Transport impacts
- 5.3 - Walking and cycling
- 5.6 - Car parking
- 5.7 - Parking standards for disabled people and the mobility impaired
- 7.6 - West Camberwell Action Area

Supplementary Planning Documents

- Section 106 Planning Obligations (2007) and draft Section 106 Planning Obligations and Community Infrastructure Levy SPD (2014)
- Sustainable design and construction SPD (2009)
- Sustainability assessments SPD (2009)
- Sustainable Transport SPD (2010)
- Residential Design Standards SPD (2011)
- Affordable housing SPD (2008 - Adopted and 2011 - Draft)

Principle of development

Employment floorspace

- 18 The site currently provides 7,432sqm of B class floorspace in a series of warehouses of various ages spread across the site. It is owned by Scena Productions which makes and stores props and scenery for theatre and productions, and Scena also sublets parts of the warehouses to small businesses and hobby artists on an ad-hoc basis. Although there is some office space in the building fronting Camberwell Road, most of the site is used for storage and workshops and in spite of its size only employs around 40 people on a permanent basis. The planning statement advises that the site is no longer suitable for Scena because the floorspace is spread out across a number of buildings, split over many levels, and the buildings are in a poor condition. Scena is therefore in the process of a phased relocation to a new site outside the borough, having found new premises which provides uniform floorspace at ground floor level all under one roof.
- 19 Policy 4.3 of the London Plan supports the consolidation and enhancement of local office provision and recognises the role that mixed-use development can play in this, and policy 4.4 seeks to manage the stock of industrial land to ensure sufficient stock across the city to meet future demand. In terms of Southwark policy, the vision for the Camberwell action area set out in the Core Strategy advises that small businesses will be protected and encouraged within the town centre and the wider action area. This is reinforced through strategic policy 10 which states that existing employment floorspace will be protected and the provision of around 25,000-30,000sqm of additional business floorspace will be supported in various locations, including Camberwell action area and on classified roads.
- 20 Saved policy 1.4 of the Southwark Plan is also relevant, which seeks to protect sites with established B class uses where they front or have direct access to a classified road or are located within the central activities zone or the strategic cultural area. Given that Camberwell Road is classified, the existing B class floorspace is afforded protection under this policy. The policy also sets out the instances in which a loss of B class floorspace may be permitted, and establishes the following criteria for assessment:
 - a) Convincing attempts have been made to dispose of the premises, either for continued B class use, or for mixed uses involving B Class, including redevelopment, over a period of 24 months, have been unsuccessful; or

- b) The site or buildings would be unsuitable for re-use or redevelopment for B Class use or mixed uses including B Class use, having regard to the physical or environmental constraints; or
 - c) The site is located within a town or local centre, in which case in accordance with policy 1.7, suitable A Class or other town centre uses will be permitted in place of Class B uses. Where an increase in floor space is proposed, the additional floor space may be used for suitable mixed or residential use.
- 21 No marketing of the site for continued B class use has been undertaken and the site is not located in a town centre, therefore the proposal would not comply with parts a) or c) of the policy. With the exception of the warehouse which is to be retained and extended (block D) the buildings are not in a particularly good condition, although no information has been provided as to the cost of refurbishing them.
- 22 The applicant has therefore sought to demonstrate that the proposal would comply with part b) of the policy and that it is unsuitable for continued B class use in its current condition. A report by Kalmars commercial agent has been submitted which sets out a number of issues with the existing site and buildings which make it unsuitable for continued B class use as follows:
- The buildings are in a poor state of repair and most do not have heating; they would require considerable capital investment to enable them to be re-occupied for commercial uses once Scena has vacated the site.
 - The site is extensively developed and the buildings are arranged in a disparate manner around the site with an illogical layout which makes it difficult to provide access for deliveries or for vans and lorries to manoeuvre around the buildings:
 - The buildings are arranged over many different floor levels and have poor internal layouts which makes them unsuitable for most modern industrial or storage uses;
 - Given the age and condition of the buildings maintenance costs would be very high;
 - The services are likely to need replacing which on its own would make refurbishment of the buildings uneconomical.
 - The size and position of the loading doors are inadequate for modern industrial use.
- 23 Permission is therefore sought for a comprehensive redevelopment of the site for mixed-uses including B1 class. It would provide 1,110sqm of B1 class floorspace, 209sqm of B1 / D1 class floorspace and 456sqm of A1 / B1 class floorspace, amounting to 1,775sqm in total. The applicant has advised that although there would be a significant loss of B class floorspace of 5,657 sqm, it would create 60 jobs whereas the existing use supports only 40. Notwithstanding this it is recognised that a greater number of jobs could be created if more commercial floorspace were provided on the site, and the extent of the loss has been raised as a concern by the Council's Local Economy and Planning Policy Teams and the GLA. Moreover, marketing information has been submitted with the application which indicates that there would be demand for commercial space in this location were it to be provided.
- 24 The loss of the B class floorspace on the site must therefore be weighed against the benefits arising from the scheme, particularly the need to provide additional housing in the borough including affordable housing. The site is not located in a town centre and as such is considered unlikely to be attractive as a location for a large-scale conventional office space. It is also not located in particularly close proximity to other employment generating uses other than the railway arches to the west of the site and employment

opportunities generated by the various retail uses along Camberwell Road. There is a pressing need for housing in the borough and a requirement under saved policy 3.11 of the Southwark plan to make an efficient use of land. 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 2015-2025 and policies 4.2 and 4.3 of the London Plan are also relevant which provides support for mixed-use redevelopment of commercial sites; this is reinforced through strategic policy 5 of the Core Strategy. Notwithstanding the significant loss of B class floorspace, it is also noted that the proposal would provide almost 2,000sqm of commercial floorspace, most of which would be for B class use and which would generate a greater number of jobs than its existing use.

- 25 With regard to the provision of small workshop units on the site, this is considered to be appropriate and may result in a better relationship with the neighbouring residential properties than if it were occupied by a more extensive B8 storage and distribution use. It would tie in with the Core Strategy vision for Camberwell Action Area, which recognises that Camberwell has a well-known reputation as a creative place with artistic influences clustering around Camberwell College of Arts. The commercial space would be located on the northern part of the site within blocks A and D, with the flexible units which could be used for business or retail purposes located along the Camberwell Road frontage giving them the greatest visibility to passers-by. Ten further workshops would be located along the Blucher Road frontage which would have spill-out space onto the new courtyard at the rear allowing for interaction between the different occupiers, and all of the servicing activities would take place from within the development on the northern part of the site. Block E would be located at the rear of the terrace of buildings on Camberwell Road and although this would appear as somewhat of an anomaly on the plans, there is currently a larger structure in that location. It would not benefit from particularly good outlook, although high level windows and rooflights are proposed which should ensure that it would be adequately lit. It is also noted that commercial units often occupy railway arches which are similarly restricted in relation to outlook.
- 26 The GLA requested further information regarding how the commercial units would be delivered, marketed and managed, and the applicant has submitted a Management and Marketing Brief in response. It advises that the commercial units would be provided at the same time as the residential, and it is recommended that this be secured through the s106 agreement. The units would be delivered to 'shell and core' only, with provision for basic essential services (water, electricity, sewer and internet connection points). The brief advises that incentives will be considered to encourage potential tenants, which could include unit fit out costs being incorporated into a rent-free period, although this has not been confirmed.
- 27 The brief advises that place marketing and brand creation would be used to generate an identity for the development and the units would be marketed with local commercial agents as soon as practicable following a grant of planning permission. Brochures would be created for the development and the units would be marketed through local newspapers, retail publications and online. The brief advises that the existing tenants and sub-letters would be directly approached by the commercial agents in the first instance.
- 28 If planning permission is granted, an Estate Management Company would be established shortly afterwards which would employ a professional estate manager to manage all aspects of the scheme once it starts to become occupied. Given the limited management details provided at this stage, it is recommended that a clause be included in the s106 agreement requiring details of the management strategy for the commercial units to be submitted for approval.
- 29 The design, layout and arrangement of the new commercial space should be attractive to prospective tenants and would create a clearly identifiable commercial cluster within

the site. It could be suitable for creative and arts-based companies needing smaller units which would be appropriate given the reputation the area has developed in relation to art and design. Given the location of the site outside of the central activities zone, a town centre or a recognised business district there may be a limit on the quantum of new space that it could viably support, therefore on balance the proposal is considered to be a reasonable response to the characteristics and location of the site.

- 30 The council has prepared a draft s106 planning obligations and community infrastructure levy SPD. The document was consulted on early this year and an Examination in Public (EiP) was held in July this year. The Inspector requested that the council provide additional information to support its CIL charging schedule and this is currently being consulted on until January 2015. Notwithstanding that, the document has been through a consultation process and can be attributed some weight.
- 31 The draft SPD makes provision for requiring financial contributions where a proposal would result in a loss of B class floorspace in protected locations, such as the application site. The contributions would be used to contribute towards skills and employment programmes within the borough and the SPD sets out the method for calculating the contribution based upon the average cost for an unemployed Southwark resident to gain support and training to get access to a skilled job (£4,000) multiplied by 10 per cent of the number of employees that the lost B class floorspace would have employed. In this instance a contribution of £183,333 would be expected. The applicant and officers have not been able to agree the contribution at the time this report was published. An update on this matter will be reported in the addendum report. In light of the increased number of jobs which the development could support and in the event of an agreed contribution towards providing skills and employment programmes within the borough, it is considered that the loss of the B class floorspace would be adequately mitigated.

Re-development of Blenheim substance abuse support centre

- 32 The single-storey building at 252 Camberwell Road provides 194sqm of floorspace and was last occupied by Blenheim for its Rise Day programme, which provides support for people with substance abuse issues; this use would have fallen within class D1 (non-residential institution).
- 33 Policy 3.16 of the London Plan seeks to protect and enhance social infrastructure and advises that proposals which would result in the loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted; it requires the suitability of the space for other forms of social infrastructure to be considered. This is reinforced through saved policy 2.1 of the Southwark Plan which states that planning permission for change of use from D class community facilities will not be granted unless:
- i) The applicant demonstrates to the satisfaction of the Local Planning Authority that the community facility is surplus to requirements of the local community and that the replacement development meets an identified need; or
 - ii) The applicant demonstrates that another locally accessible facility with similar or enhanced provision can meet the identified needs of the local community facility users.
- 34 The applicant has submitted a letter from the operations director at Blenheim which confirms that the organisation had been planning to vacate the premises for some time owing to a change in their operational requirements and because the quality of the unit was such that it was no longer suitable for their needs. The organisation has relocated to a new premises at Bolton Crescent which is located off Camberwell New Road, 1.2 kilometres from the site or approximately a 15 minute walk away. The letter advises that

the new premises provides good access and a more spacious operational environment and that the feedback from the service users has been positive. The wider Camberwell area remains within the catchment area of the service and the relocation has allowed Blenheim to deliver improved services within a discrete location and an appropriately specified building which includes kitchen and food preparation areas, communal eating area, IT suite and working areas. The letter also confirms that the applicant held discussions with Blenheim when the plans were being developed to see whether they wanted to be re-housed within the new development, but before the application was submitted Blenheim confirmed their intentions to relocate anyway. In light of this it is considered that part ii) of the policy has been met and the applicant has demonstrated that there is another locally accessible facility with enhanced provisions which can meet the needs of those who were formerly using the services offered at the site.

- 35 Notwithstanding this, it is not known whether there would be demand for other D class uses of the premises as required by the London Plan policy and the GLA has raised concerns in this respect. The applicant has therefore agreed that commercial unit 01 within the development could be for D class use; this unit would be located at ground and first floor level within block A and would provide 209sqm of floorspace. A condition is recommended requiring the unit to be marketed for D class purposes for a period of 6 months from practical completion and in the event that no occupier is found, it can be used for B1 use.

Provision of retail space

- 36 Depending on how the flexible units end up being used, there could be up to 394sqm of retail floorspace on the site, which would be a relatively modest amount which would not adversely impact upon Camberwell town centre. It would likely have a local catchment and would provide animation and activation to the streetscape. The existing building fronting Camberwell Road gives little to the street scene and the provision of commercial units in this location with fully-glazed shop fronts is considered to be a positive aspect of the scheme.
- 37 To conclude in relation to land uses, it is recognised that there would be a significant loss of B class floorspace on the site. The scheme would however, provide 1,775sqm of commercial floorspace, most of which would be for B class use, and the commercial provision could generate 20 additional jobs compared to the existing situation. The site is not located in a town centre and the surrounding uses are predominantly residential and on balance, the proposal is considered to be acceptable in terms of land uses.

Environmental impact assessment

- 38 Prior to the submission of this application, a request for a screening opinion was submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 'the Regulations'. The screening opinion was for redevelopment of the site comprising up to 2,500sqm of non-residential floorspace (Use Classes A1/B1 and live/work units), up to 170 residential units, parking and amenity space (reference:14/AP/1773).
- 39 A negative screening opinion was issued, i.e. it was concluded that the proposed development would not require an environmental impact assessment (EIA) to be undertaken. It was concluded that according to the Regulations, the site could be classified as a schedule 2 'urban development project' by virtue of its site area which exceeds 0.5ha. An assessment was therefore made as to whether the development was likely to have a significant effect upon the environment by virtue of its nature, size or location, based on a review of the schedule 3 selection criteria for screening schedule 2 development.

- 40 It was concluded that the nature, scale and location of the development was not such that it would be likely to give rise to environmental effects of more than local significance. The site is not located within a 'sensitive area' as defined by the regulations and based on the information submitted, it was found that no EIA would be required.
- 41 Given the similarities between the proposal subject to the screening opinion and that for which permission is now sought, it is considered that the proposal would not have a significant effect on the environment by virtue of its nature, size and location, and that based upon a review of the selection criteria set out in schedule 3 of the regulations, an EIA would not be required.

Density

- 42 Strategic policy 5 of the Core Strategy 'Providing new homes' expects a density range of between 200-700 habitable rooms per hectare (hrh) in the urban density zone. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes and requires areas of non-residential space to be divided by 27.5 to create an equivalent in terms of habitable rooms per hectare. Based on this methodology, the proposed development would achieve a density of 776 habitable rooms per hectare, exceeding the expected range. However, as set out below the quality of accommodation, the height, scale and massing of the development and its impact upon neighbouring occupiers is considered to be acceptable, therefore no objections are raised.

Affordable housing

- 43 Strategic policy 6 of the Core Strategy 'Homes for people on different incomes' requires at least 35 per cent of the residential units to be affordable and at least 35 per cent to be private. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms rather than total number of units, and further information can be found in the council's draft Affordable Housing SPD (2011). In accordance with saved policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required.
- 44 With regard to tenure, saved policy 4.4 of the Southwark Plan requires a split of 50 per cent social rented: 50 per cent intermediate in this area. All of the affordable units should be provided on site and a mix of housing types and sizes for the affordable units would be required; saved policy 4.3 of the Southwark Plan advises that studio flats are not suitable for meeting affordable housing need.
- 45 The proposed development would provide 43 affordable housing units which would equate to 33.8per cent in terms of habitable rooms. These would be located in block A which would be all affordable units, with a further ten affordable units in block B. For the purposes of affordable housing, where kitchens less than 11sqm are not counted and rooms larger than 27.5 can be counted as two, there would be 517 habitable rooms within the development. In order to achieve 35 per cent affordable housing the development would need to provide 181 affordable habitable rooms, although this could be reduced to 174 because seven wheelchair accessible affordable units would be provided. The proposal would provide 175 affordable habitable rooms and would therefore be policy compliant.
- 46 With regard to tenure split there would be 58per cent intermediate and 42 per cent social rented affordable housing. This would not be far from the 50/50 policy requirement and no objections are raised. Of the eleven social rented units with three or more bedrooms, eight would have separate kitchen and living spaces. The remaining three would have an open plan room but they would be L-shaped which would provide some separation between the uses and this is considered to be acceptable.

47 The mix of affordable housing units would be as follows:

	Social rented	Intermediate	Total
1 bedroom	3	9	12
2 bedroom	4	9	13
3 bedroom	6	5	11
4 bedroom	5	2	7
Total units	18	25	43

48 The proposal would provide a good mix of affordable units including a good range of family sized units which is a positive aspect of the scheme. As the site is in an area where a minimum of 35 per cent private housing is required, a clause should be inserted in the legal agreement to secure this.

Housing mix

49 Strategic policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60 per cent 2+ bedroom units and 20 per cent 3+ bedroom units. No more than 5 per cent studio units can be provided and these can only be for the private housing. The proposed development would provide 65.3 per cent 2+ bed units and 20.2 per cent 3+ bed units which would be policy compliant.

Unit size	Amount	Percentage
1 bed	57	34.8%
2 bed	74	45.1%
3 bed	26	15.9%
4 bed	7	4.3%
Total	164	100%

Quality of accommodation

50 Saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. Further information is provided in the Residential Design Standards SPD which sets out minimum unit and room sizes, together with amenity space standards. Owing to the largely backland nature of the site which is constrained by the large and imposing mass of the church to the south and the railway viaduct to the west, and the need to make an efficient use of the site, there would be some units of accommodation at ground floor level which would have an extremely limited outlook. The general site layout is considered to be acceptable however, and would incorporate areas of high quality landscaping, children's play space and parking.

Privacy

51 Overall the scheme is considered to be acceptable in relation to the privacy of the proposed units. There would be some limited instances of close relationships which would have the potential to compromise privacy, but this could be mitigated through the use of obscure glazing.

52 There would be a very close relationship of 7m between one balcony in block A and an open plan living space in block D. It is noted however, that the open plan living space would also be served by glazing in the south elevation leading onto a balcony therefore if this relationship were found to be overly obtrusive to future occupiers, a privacy film could be installed without unduly compromising the quality of the living space. There would be a minimum of 11m between balconies in block A and windows in the north

elevation of block B, although these would face each other across the access road and would only be just short of the 12m recommended in the Residential Design Standards SPD where properties face each other across a street.

- 53 Some of the units in block B would have quite close relationships near to the inward facing corners, but areas of obscure-glazing would be incorporated into some of the windows to maintain privacy; obscure glazing should also be installed in the ground floor north-facing windows of this block overlooking the access road to maintain privacy. There would be just 6m between block B and proposed block E which would accommodate commercial space. At ground floor level there would be a garden to the residential unit and landscaping could provide privacy, and at first floor level block E has been designed to incorporate a louvered privacy screen therefore there would be no loss of privacy to the units on the upper floors of block B.

Outlook

- 54 The outlook to the units within the development is generally considered to be acceptable, although some units close to the site boundaries would be somewhat compromised on the lower floors. In these locations the units would generally be dual aspect, with less sensitive bedrooms located where the poorer aspect would occur.
- 55 There would be a very limited outlook to a number of the units in blocks B and C owing to their proximity to the site boundaries, the church and the railway viaduct. Blocks B would be set a minimum of just 1m off the boundary with the church site, although at ground floor level this would largely be taken up by refuse storage and cycle parking. The layout of the units also places bedrooms close to the boundary which are less sensitive to light and outlook, and a number of them would have additional windows in their side elevations. The principal living spaces would look out onto the landscaped communal courtyard.
- 56 With regard to block C, at the closest point this building would sit just 0.3m off the boundary, with balconies and glazing almost on the boundary at first-seventh floor levels facing south-west, and bathroom, storage and secondary living space windows in the southernmost elevation. These would have a good outlook over the church car park, but it is recognised that the church may want to develop the adjoining site in the future, and has objected to the application on this basis. The windows in the southern-most elevation should be obscure-glazed and top-opening only and this would not compromise the quality of accommodation to be provided.
- 57 Regarding the south-western windows and balconies, the BRE report considers the impact of constructing a building on the church car park site of a broadly similar height to block C and occupying much of that site. The report concludes that a building sitting within that envelope would only affect one window in block B and two windows in block C. The ground floor bedroom window in block B would have its ADF reduced from 0.96 per cent and open plan living spaces at second and fourth floor levels in block C would have their ADFs reduced from above 2 per cent to 1.20 per cent and 1.4 per cent, which are not considered to be particularly low. It is also noted that there would be various ways to develop the church site. Their outlook would undoubtedly change, but this would only affect a very small number of units and it would still be possible to develop the church site without significantly compromising the quality of the accommodation. By the same measure proposed block C would not adversely impact upon levels of light which could be received by a building within the hypothetical building massing shown for the church site. It would also remain possible to develop the car park site in a more conventional manner with buildings running parallel to Medlar Street and amenity space at the rear, therefore although there would be windows and balconies very close to the boundary it is not considered that they would unduly compromise the development potential of the adjoining site.

58 Block D would share a similarly close relationship with the railway viaduct, although at ground floor level the units would be commercial. At first floor level bedrooms and a dual aspect living space would face onto the railway, with a minimum separation distance of 4m. The floor levels would be such however, that the windows would have views out onto the railway and beyond rather than onto the viaduct.

59 The individual unit sizes within the development would be as follows:

Bedspaces	Overall unit size	SPD minimum	Amenity space	SPD Minimum
1-bed	51-78.5sqm	50sqm	5.3-31sqm	5-10sqm
2 bed	72.8-101sqm	61-70sqm	0-59sqm	5-10sqm
3 bed	83.6-126sqm	74-95sqm	8-85sqm	10sqm
4-bed	92-103.2sqm	90-99sqm	12-51.1sqm	10sqm

60 The proposed layout of the flats is considered to be acceptable. It is noted that the ground floor units in block C would have large rear gardens accessed from bedrooms which may limit how much the space could be used, but they would also have amenity space at the front accessed from the living spaces therefore no objections are raised. The amenity space provision is discussed further at paragraph 63 of the report.

Internal light levels

61 The majority of the units (76 per cent) would be dual or triple aspect which is a positive aspect of the scheme, and none of the single-aspect units would be north-facing. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF) which determines the natural internal light or day lit appearance of a room; the BRE guidance recommends an ADF of 1 per cent for bedrooms, 1.5 per cent for living rooms and 2 per cent for kitchens.

62 Within the proposed scheme 94 per cent of the residential windows would meet the recommended ADF which is welcomed. There would be nine rooms within the scheme which would achieve ADFs of less than 1 per cent, the lowest being three rooms in block B and one room in block C. Within block B these would be three kitchen windows at first, second and third floor levels with ADFs ranging from 0.12 per cent to 0.37 per cent which would be very low. These windows would face directly onto an inset balcony resulting in the low values therefore it is recommended that a condition be imposed requiring either the kitchen windows to be relocated to the northern elevation, or an additional window to be provided in the north elevation which would improve levels of light. Within block C there would be a ground floor bedroom window with an ADF of 0.18 per cent ; this window would face east onto the communal amenity space and is affected by overhanging upper floors. Values higher than this range from 0.54 per cent for a first floor bedroom window in block A and 0.96 per cent for a first floor living room also within block A. Whilst the shortfalls are noted, the overall compliance rate is very high and on balance this is considered to be acceptable.

Amenity space

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

- 50 sqm communal amenity space per development;
- For units containing three or more bedrooms, 10 sqm of private amenity space;
- For units containing two or less bedrooms, 10 sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity

- space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement;
- Balconies, terraces and roof gardens must be a minimum of 3 sqm to count towards private amenity space.
- 64 All but three of the units would have access to private amenity space in the form of a garden, balcony or terrace. The three units without any private amenity space would all be located in the retained warehouse building (block D) but as the existing building forms an attractive and characterful part of the streetscene its retention is welcomed, and given the constraints of converting the existing building no objections are raised. This block would contain four x 3-bedroom units, three of which would have access to 9sqm of private amenity space and another to 9.6sqm of private amenity space, just below the 10sqm requirement which would not be significant. A 3-bed unit within block A (A022) would only have 8sqm of amenity space and the applicant has requested that this be addressed by way of a condition, which form part of the draft recommendation.
- 65 Overall there would be a shortfall of 218sqm of private amenity space within the development, but in accordance with the approach set out in the SPD this would be more than compensated for in the communal provision. The proposed development would provide 726sqm of communal amenity space in two courtyards on the northern and southern parts of the site and a further 185sqm of communal amenity space would be provided at second floor level within block A for occupiers of that block.
- 66 Section 3.2 of the Residential Design Standards SPD advises that children's play areas should be provided in all new flat developments containing the potential for 10 or more child bed spaces. It is proposed to provide a 220sqm play area for children which would be located in the communal courtyard between blocks B and C. This would not meet all of the play requirements that the development would generate, and as detailed in the planning obligations section of this report a contribution towards children's play space would be provided.
- 67 The BRE guidance advises that for an area to appear adequately sunlit throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21st March. The BRE report confirms that all of the communal amenity areas would achieve this, with 71.25 per cent of the space receiving more than 2 hours of sun. The private gardens (not balconies or terraces) have been tested and all but one would pass. The one which would fail would be a garden to the northern-most unit in block C which would be affected by its proximity to the railway viaduct.

Noise and vibration

- 68 A noise and vibration assessment has been submitted with the application which recommends that a site specific construction management plan be prepared to reduce potential noise impacts during construction. This should also include details of construction traffic routes, working hours including deliveries and how they would be managed, together with measures to minimise noise, vibration and dust and a condition to this effect is recommended. The report considers the impact of trains on the quality of accommodation and has been updated to include the impact of additional trains using the railway line over the next three years, including overnight, whilst work to London Bridge Station takes place. The report has been reviewed by the Council's Environmental Protection Team (EPT) and a number of conditions are recommended to ensure that noise and vibration levels within the flats would fall within acceptable levels.

Secure by design

- 69 The application has been reviewed by the Metropolitan Police Secure by Design advisor who has requested that a condition be imposed requiring the development to achieve

secure by design certification. It is recommended that such a condition be imposed in the event that planning permission is granted.

Wheelchair accessible housing

- 70 Saved policy 4.3 of the Southwark Plan requires at least 10 per cent of all major new residential developments to be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.
- 71 There would be 17 wheelchair accessible units within the development which would equate to 10 per cent provision, and all of the units would be lifetime homes compliant.. The wheelchair accessible units would be located in blocks A and B and would comprise 11 x 1-bed units and 6 x 2-bed units. Of these, 6 x 1-bed and 1 x 2-bed units would be in the affordable sector and the wheelchair affordable housing 'discount' has been applied. This requires the wheelchair accessible units to be fitted out. In the event that the wheelchair affordable units are not fitted out for occupation, one additional affordable habitable room within the development or an in-lieu contribution of £80k per unit for each unit not provided would be required, and this should be secured through the s106 agreement. Large-scale drawings of a typical layout of the wheelchair units have been provided and the en-suite bathrooms would not be fully accessible therefore a condition for revised details is recommended; the cores serving the wheelchair accessible units would each have two lifts.

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

- 72 Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. Saved policy 3.2 of the Southwark Plan states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
- 73 The use of the site for commercial space and housing would be consistent with the neighbouring land uses and should not result in any loss of amenity to neighbouring occupiers. Servicing to the site would need to be carefully managed and this is considered in the transport section below.

Privacy and outlook

Bishops Mead

- 74 This is a 4-storey building containing garages on the ground floor and flats above located to the north of the site on the opposite side of Blucher Road. The flats in Bishops Mead currently experience good levels of outlook across the site because some of them overlook an open area used for parking and the existing building fronting Camberwell Road is not particularly high. As such, the plans have been amended to pull the upper floors of part of block A further away from this building owing to concerns regarding light and outlook.
- 75 There would be a minimum separation distance of 16m between the balconies in Bishops Mead and block A, which would increase as the building would step back at upper floor level along its Blucher Road frontage. There would be 20m between Bishops Mead and block D and both of these distances would exceed the 12m recommended in the Residential Design Standards SPD where properties face each other across a street. The outlook to these units would undoubtedly change and they would feel more

enclosed, but the separation distance and changes to the massing are considered such that the outlook to these properties would not be significantly harmed.

Opposite side of Camberwell Road

- 76 There would be a distance of 36m to the properties on the opposite side of Camberwell Road therefore no loss of privacy or outlook would occur.

242-250 Camberwell Road

- 77 The rear of this terrace is not uniform and the plans show that the closest window-to-window relationship would range from 15m between a first floor window at the rear of 244-246 Camberwell Road and block B increasing to 22m at the rear of 242 which is the public house. These buildings would face each other across what would become a new internal street leading to the car parking spaces and the recommended 12m would be exceeded. At second floor level this would increase to 18m and the privacy and outlook to these units is considered to be acceptable; it is noted that there are currently a number of buildings on this part of the site.

- 78 250 Camberwell Road appears to be in commercial use at ground floor level (a legal practice) and two flats above. The proposed new building at 252 Camberwell Road would extend 6.5m beyond the rear of number 250 at ground floor level but given that it is in commercial use no objections are raised. At first and second floor levels it would extend 3m beyond number 250 which would comply with the Residential Design Standards in relation to the depth of rear extensions. The windows would be angled away so that they would not directly face block B.

- 79 There is currently a large L-shaped building at the rear of the terrace which would be removed and replaced with block E, which would be smaller in terms of both footprint and height. It would contain windows on the boundaries, but the existing building does therefore no objections are raised. Given that it would be smaller than what is currently there, the amenity of the immediate neighbours should be improved.

254-268 Camberwell Road (listed church)

- 80 There are some small windows in the northern elevation of the church facing the site. These are located towards the Camberwell Road frontage and given the non-residential use of the space it is not considered that these are sensitive to privacy or outlook. The flats would need to be well sound-proofed which would minimise the likelihood of noise complaints against the church from future occupiers of the development. The issue of whether proposed block C would cause blight to the car park at the rear of the site has been considered in the 'quality of accommodation' section of this report.

Reader House

- 81 This is a 6-storey block of flats located to the south-west of the site on the opposite side of the railway viaduct, and which has windows in its rear elevation facing the site. There would be a separation distance of 47m between this building and proposed block C which would be sufficient to ensure that no unacceptable loss of outlook or privacy would occur. Also on the opposite side of the viaduct are Hodister Close and Arnot House and the separation distances would be approximately 40m and 44m respectively which would ensure that no unacceptable loss of privacy or outlook would occur.

Railway arches and viaduct

- 82 These are in commercial use and are accessed from the western side of the viaduct. As such it is not considered that the proposal would impact upon their operations and again, the requirement for the flats to be adequately sound-proofed is noted.

- 83 Network Rail has been consulted on the application and has advised that discussions are taking place with the developer regarding the detailed construction of the proposed development and access for future maintenance. The applicant has entered into an

Asset Protection Agreement with Network Rail and all safety and engineering matters would be dealt with post-planning through that process.

Daylight and Sunlight

- 84 The BRE daylight and sunlight report submitted with the application considers the impacts on the following properties:

1-38 Bishops Mead
1-40 Lamb House, Camberwell Road
203-213 Camberwell Road
242-250 Camberwell Road
1-15 Reader House
Comber House
Arnot House

- 85 The following tests have been carried out:

Vertical Sky Component (VSC) - the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27 per cent, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20 per cent reduction) following the construction of a development, then the reduction will not be noticeable.

No-Sky Line (NSL) - the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20 per cent reduction).

Sunlight - Annual Probable Sunlight Hours (APSH). This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25 per cent APSH, with 5 per cent of this total being enjoyed during the winter months. If a window receives less than 25 per cent of the APSH or less than 5 per cent of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4 per cent, then sunlight to the building may be adversely affected.

Overshadowing - The BRE guidance advises that for an area to appear adequately sunlight throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21st March. If an area would not meet the above and 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.

- 86 Although ADFs have been provided in the report, the room layouts have only been verified for Bishops Mead and 244-246 Camberwell Road therefore they have only been relied upon for these buildings.

1-38 Bishops Mead

- 87 The BRE report advises that 16 livingroom windows at first floor level and four at second floor level would fail on VSC, although not by a significant degree ranging from a 20.76 per cent to a 30.28 per cent reduction or actual VSCs ranging from 23.81 per cent to 26.89 per cent. In relation to NSL, 13 windows at first floor level and 4 windows at second floor level would fail with percentage reductions ranging from 20.37 per cent to 40.12 per cent. All of the rooms would pass in relation to ADF however, and would retain a well lit appearance. The room layouts have been verified through estate agents details relating to one of the flats therefore the ADFs can be relied upon. All of the windows would pass in relation to APSH and would all receive more than 5 per cent during winter.

88 The orientation of the site is such that there would be some shadowing towards Bishops Mead throughout the day and an update to the BRE report advises that no overshadowing would fall toward the balconies from the proposed development during the morning and afternoon due to position of the sun. At midday, when shadows are cast to the north, there would be shadow to the access road/car park area directly to the north and the lower parts of the Bishopsmead elevation only. The overshadowing impact has been mitigated by the building design which would be 'cutaway' and 'setback' at the upper floors, limiting the shadows cast. The report advises that at midday the majority of the balcony floor area would be in shadow due to their solid masonry balustrades and overhangs above. As such the report concludes that any overshadowing impact to Bishopsmead would be negligible.

1-40 Lamb House, Camberwell Road

89 These are located on the opposite side of Camberwell Road. All of the windows tested would pass in relation to VSC, NSL and sunlight, and its external amenity space would comply with the BRE guidance.

203-213 Camberwell Road

90 These are located to the north-east of the site on the opposite side of Camberwell Road. All would pass in relation to VSC and NSL. Four windows would fail in relation to sunlight, with a 30 per cent reduction during the winter and 12.50 per cent reduction overall. However, the summer sunlight would be largely unaffected and overall it is considered that the daylight and sunlight to this building would be acceptable.

242 Camberwell Road (the Nags Head)

91 The only affected window would be a first floor kitchen window which would pass in relation to VSC and NSL. It would fail in relation to sunlight because it would experience a 66.67 per cent reduction in winter sunlight and an 11.54 per cent reduction overall. However, its winter sunlight would only be reduced by 4.35 per cent and overall this is considered to be acceptable.

92 In relation to the pub garden, the update to the BRE report advises that the impact would be negligible due to existing buildings directly on the south and west boundary currently casting a shadow over the pub garden during the afternoon. It advises that shadowing may be reduced because the proposed buildings would be set back from the boundary.

244-246 Camberwell Road

93 A ground floor livingroom / diner window would pass in relation to VSC but would fail in relation to NSL with a percentage reduction of 52.74 per cent. Although the significant fail on the NSL is noted, given that it passes on the VSC on balance this is considered to be acceptable and the window would retain an ADF of 1.21 per cent, not significantly short of the 1.5 per cent recommended for living rooms. This window would also fail in relation to sunlight with a 25 per cent reduction in summer sunlight and a 5 per cent reduction overall, however this would not be significantly short of the BRE recommendation.

94 At first floor level a bedroom window would fail both on VSC and NSL with percentage reductions of 24.79 per cent and 69.36 per cent, but as it serves a bedroom it is considered to be less sensitive and it would retain an ADF of 0.92 per cent which is close to the 1 per cent recommended for bedrooms.

95 Three bedroom windows and a livingroom window have been tested at second floor level. One of the bedroom windows would fail in relation to both VSC and NSL with percentage reductions of 24.7 per cent and 44.85 per cent and it would have an ADF of 0.79 per cent. The VSC failure would not be significant however, and it is noted that the room is served by a second window which would pass in relation to VSC. On balance therefore, the impact upon this room is considered to be acceptable. At third floor level a

bedroom window would pass in relation to VSC, NSL and ADF and all of the first and second floor windows would pass in relation to sunlight.

248 Camberwell Road

- 96 A first floor window to this property would marginally fail in relation to VSC with a percentage reduction of 21.61 per cent and would fail on NSL with a 56.94 per cent reduction; the impact upon this window would pass in relation to sunlight and overall the impact is considered to be acceptable. A second floor window would marginally fail in relation to VSC with a 20.54 per cent reduction and would pass in relation to NSL and sunlight. Third floor windows tested in this property would pass in all tests.

1-15 Reader House

- 97 All of the windows tested would pass in relation to VSC. One window would fail in relation to NSL but only marginally, with a 21.99 per cent reduction. All of the windows tested would pass in relation to sunlight.

Comber House (described as Blucher Road north in the BRE report)

- 98 All of the windows tested would comply in relation to VSC, NSL and sunlight.

Arnot House (described as Blucher Road south in the BRE report)

- 99 One window at ground, first, second and third floor levels would fail in relation to VSC with percentage reductions ranging from 21.55 per cent to 33.98 per cent which would not be significant. All of the windows would pass in relation to NSL and sunlight. In relation to its external amenity space, an update to the BRE report advises that it would likely comply with the BRE guidance.

- 100 Overall whilst it is recognised that there would be a number of instances where the impact on the neighbouring properties would not comply with the BRE guidance, the impacts are not considered to be so great that they would result in a significant loss of amenity in this densely built up urban location. A number of the existing buildings on the site are close to the rear boundaries of 242-250 Camberwell Road and there would be improvements to the outlook from these properties as proposed block E would be smaller and lower than the existing structure in that location and block B would be set back from the site boundary. It is also noted that the buildings currently look out onto a series of industrial building, some of which are in a poor condition. With regard to the matters outlined above, the impact of the proposed development on the amenity of neighbouring properties is considered to be acceptable.

Impact of adjoining and nearby uses on occupiers and users of proposed development

- 101 The uses most likely to impact upon the proposed development would be the neighbouring church and railway line. However, as detailed above conditions are recommended to ensure that noise levels within the proposed flats would fall within acceptable levels and it is noted that a number of the surrounding dwellings also share close relationships with these existing uses.

Transport issues

- 102 Saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards. The site has a PTAL (public transport accessibility level) of 6a (high) and is located in a controlled parking zone (CPZ). There is a bus lane outside the site and a bus stop in front of 244-246 Camberwell Road; Camberwell Road forms part of the Transport for London (TfL) road network for which TfL is the highway authority.

Access and site layout

- 103 The existing access from Camberwell Road would be retained and upgraded and would become a shared pedestrian, cyclist and vehicular access into the site and an existing unused vehicular access outside number 252 would be reinstated to footpath. There would be a pedestrian pathway on the northern side of the access adjacent to block A which would measure a minimum of 2.3m wide. There would be a further pedestrian and cyclist access directly from Blucher Road between blocks A and D and this is considered to be an acceptable arrangement.
- 104 Tracking diagrams have been submitted which show that cars parking in the spaces next to blocks A or B could enter and exit the site in a forward gear. Larger vehicles would enter the site, reverse onto the internal street leading to the larger parking area and then pull into a loading area which would be provided outside block A without disrupting inbound and outbound traffic. The tracking diagrams show that a medium-sized refuse vehicle, a 7.5 ton box van and a fire engine would be able to enter and exit the site in a forward gear and seating and retractable bollards would be provided within the hard landscaped areas outside blocks A and D to prevent vehicles from being able drive right up to the commercial units which would enable these spaces to be used as spill-out work spaces. Retractable bollards would be provided at the end of the access approaching blocks C and D so that with the exception of emergency vehicles, the areas beyond would be for pedestrians and cyclists only and would also be used to prevent unauthorised parking within the development.
- 105 Off-site highway works are proposed to the existing entrance and outside 252 Camberwell Road a Grampian condition is recommended preventing the development from being occupied until these works have been completed. A clause within the s106 agreement should require the applicant to enter into a s278 highways agreement to secure these works including the detailed specification.

Trip generation

- 106 The Transport Statement (TS) submitted with the application advises that a surveys of vehicles entering and exiting the site has been undertaken. It revealed that the site currently generates approximately 63 vehicle movements in the morning peak, the majority of which are inbound, and approximately 54 movements in the evening peak which are mostly outbound movements. It notes that a number of these were large vehicles collecting and delivering goods and materials.
- 107 Given that only 12 parking spaces would be provided to serve the development the likely trip generation associated with the residential units is likely to be very low. The TS concludes that the commercial space would generate 30 vehicle trips in the morning peak, five of which would be delivery vehicles, and 24 in the evening peak. This would be less than the existing uses on the site and would have a negligible impact upon the safety and operation of the surrounding highway network.

Car parking

- 108 The saved Southwark Plan residential parking standard in this location is for a maximum of 0.4 spaces per dwelling plus one visitor space per 10 units, which would require a maximum of 66 parking spaces plus 16 visitor spaces to serve the development.
- 109 The proposed parking provision would be significantly below the maximum requirement, equating to 0.072 parking spaces per unit for the residential units. However, the site has excellent access to public transport, is in close proximity to Camberwell town centre, and is located in a controlled parking zone therefore overspill parking could be prevented by way of a condition preventing future occupiers from obtaining parking permits. The

scheme would provide a contribution of £5,500 towards the provision of a car club space and each eligible adult within the development would be provided with 3 years membership. In light of this the proposed level of residential parking is considered to be acceptable. It is noted that not all of the wheelchair accessible units would have their own parking spaces, although the allocation of the spaces could be managed on the basis of need and all of the spaces would have electric vehicle charging points.

- 110 There are different parking standards in the London Plan for food and non-food retail, and for employment and community uses. As it is not yet known how the commercial units would be occupied the required level of parking cannot be calculated, although no parking would be provided for the commercial space in any event. No objections are raised in this regard, as they would likely have a local catchment and would well served by public transport, and on-site loading / unloading space would be provided.

Cycle parking

- 111 The 2013 London Plan introduced more onerous cycle parking requirements, by which time the design of the scheme was well advanced. Table 6.3 of the 2013 London Plan requires a minimum of 1 cycle parking space per dwelling up to 45 sqm and 2 spaces per all other dwellings which would generate a requirement for 334 cycle parking spaces to serve the residential units including visitor spaces. The proposal would provide 214 residential cycle parking spaces, somewhat short of the London Plan requirement, although it would comply with the earlier version of the London Plan. The cycle parking would be a mix of Sheffield stands (46 per cent) and space pods (54 per cent), and Sheffield standards are encouraged because they are easier to use. It would be possible to provide further cycle spaces if more space pods were used, and a condition is recommended requiring revised details to be submitted for approval showing how the current London Plan requirement would be met. The same applies for the commercial space, although it is not possible to calculate the required amount at this stage until the final uses are known therefore a pre-occupation condition would be required. Generally the locations of the cycle parking spaces are considered to be convenient and they would be weather-proof and secure. It is noted that TfL has requested that an area of public realm within the site be reserved for the possible extension of the cycle hire scheme, however the site is not within the town centre and whilst there would be routes through the site it would not be widely visible to passers by. As such this has not been included as a condition.

Servicing and waste management

- 112 A delivery and service plan have been submitted with the application and all but Heavy Goods Vehicles (HGVs) would be able to enter and exit the site in a forward gear. There would be a facilities manager at the site who would be responsible for producing a deliveries and servicing schedule based on regular deliveries anticipated by the occupiers. This would ensure that there would be no conflict of use for the loading bay and deliveries would be encouraged outside of peak hours where possible and a ring-ahead procedure established. All deliveries would have to be made by 7.5 ton box vans or smaller as there would not be sufficient space on the site to accommodate Heavy Goods Vehicles (HGVs). The procedures would be monitored and reviewed by the facilities manager.
- 113 The amount of refuse and recycle storage has been calculated in accordance with the Council's standards and would be conveniently located. The site manager would be responsible for ensuring that bins would be moved to the end of the access road on collections and returned to their respective stores thereafter and these details are considered to be acceptable. An outline site waste management plan has also been submitted which details how waste arising from the demolition and construction processes would be managed. The servicing details have been reviewed and are found

to be acceptable, and should be secured by way of a condition.

- 114 A separate fire strategy has been submitted with the application which details measures such as the provision of fire escapes, smoke alarms, escape routes and emergency lighting. These are matters for Building Control and the Fire Brigade rather than planning, although it is noted that there would be space to accommodate fire engines on the site and they would be able to enter and exit in a forward gear.

Impact on public transport

- 115 The TS concludes that 80 per cent of public transport trips from the development would be undertaken by bus (111 bus trips) and 20 per cent by train / underground (27 trips). The application has been reviewed by TfL which has requested a contribution of £475k to improve bus capacity and £48k to improve bus stops. The applicant has offered a contribution of £143K in total and if agreed by TfL, this would need to be secured through the legal agreement. It is noted that a contributions towards strategic transport improvements in the borough would be secured through the s106 agreement.

Travel plan

- 116 A travel plan has been submitted with the application which outlines measures which would be used to encourage more sustainable modes of travel and sets targets for this. A travel plan co-ordinator would be employed to oversee the plan and measures proposed include a welcome pack to all new residents containing information about safe cycle routes, public transport options and car-share schemes. The travel plan has been reviewed and is found to be acceptable.
- 117 Overall it is concluded that subject to the conditions and measures outlined above, there would be no adverse transport impacts as a result of the proposal.

Design and impact upon the setting of listed buildings

- 118 The NPPF stresses the importance of good design and at paragraph 56 states that: "Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people." This is reinforced through strategic policy 12 of the Core strategy which states that "Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in." Saved policy 3.12 of the Southwark Plan is also relevant, which 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" and saved policy 3.13 asserts that the principles of good urban design must be taken into account in all developments, including height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.

Site layout

- 119 The buildings would be arranged so that the existing vehicular access would be retained and a new pedestrian and cyclist route would be provided through the site onto Blucher Road. Blocks A, C and D would sit at the edges of the site with the buildings arranged around two courtyards. Block B would have frontages onto the southern most courtyard and there would be a new internal street at the rear of 242-250 Camberwell Road leading to a parking area. The retention of block D which is an attractive warehouse building is considered to be a significant positive aspect of the scheme and would help to 'anchor' the development into its surroundings.

- 120 The commercial uses would be clustered around the northern part of the site along Camberwell and Blucher Roads. The proposed layout and the retention of the warehouse building (block D) would maximise the frontages to Camberwell and Blucher Road and would line them with active uses at ground floor level. The northern servicing area would therefore be more functional / commercial in nature with mostly hard landscaping proposed which would be reflective of the existing industrial use of the site.
- 121 The southern part of the site would be entirely residential, with blocks B and C arranged around a communal garden with a play area on its southern boundary. Although the blocks would be close to the site boundaries, this would allow for the creation of generous courtyard spaces within and overall the layout of the proposed development is considered to be acceptable.

Height, scale and massing

- 122 The buildings surrounding the site are varied, and includes the 18-storey Castle Mead block to the north of the site, 5-storey buildings on the Elmington Estate to the east of the site, and a 7-storey building planned to the south of the site along Camberwell Road (Peabody Estate) towards the town centre.
- 123 The scale of the proposed development onto Camberwell Road is considered to be the most sensitive in terms of local townscape. Block A would front this street and would be 6-storeys high, with the top floor set-back. Whilst it would be quite a substantial block in relation to the smaller scale of Bishops Mead immediately to the north, within the wider context of larger building further south near Camberwell Green and the longer blocks of flats on the opposite side of Camberwell Road, this is considered to be acceptable. It would also step down on the Blucher Road frontage, with the upper floors also stepping back away from its neighbour. This would define the taller part of block A as a strong, corner element, with the scale dropping along Blucher Road which would be appropriate.
- 124 Block B would be five storeys high and would sit behind the existing 3-storey buildings forming 242-250 Camberwell Road. Verified views submitted with the application demonstrate that it would not be overly visible from the streetscene and its scale is considered to be appropriate.
- 125 Block C at a maximum of nine storeys and 27m high would be the tallest part of the development. Although a very large block, its massing would be broken up by its cranked footprint and top floor 'pop-ups', and the massing has been further reduced by the removal of a flat towards the northern end which would result in a more gradual change in height between blocks C and D. The verified views submitted demonstrate that this block would not have any negative impact on the streetscape of Camberwell Road and its location next to the railway line is such that it would not have a harmful impact on other townscape views. As well as being the tallest part of the development it would also be the longest block, but this would be moderated on the east and west elevations by being articulated through two joints along the elevation which would ensure that it would not have an overly monolithic appearance.
- 126 On Blucher Road the retention of the well proportioned industrial building (block D) would contribute to the architectural character of the street. This building is an attractive 3-storey 1930s warehouse building with basement occupying an L-shaped footprint fronting Blucher Road and the railway line. Two floors would be added to this building, the first of which would broadly match the floor below, and with a set-back, more contemporary zinc clad extension for the top floor. The lower of the two additional floors should match the materiality of the existing building as closely as possible and the detailed design should respect its proportions, and conditions for large-scale drawings and material samples are recommended. The retention of this building, which forms an attractive part of the historic townscape of the area, is considered to be a significant

positive aspect of the scheme.

- 127 Block E would replace a larger building currently in this location and no objections are raised. The proposed building at 252 Camberwell Road would be in proportion with the existing townscape and its fenestration would fit well with the proportions of its neighbours.

Elevational design

- 128 The design of the main Camberwell Road frontage to block A would have a strongly defined ground and first floor base, which would provide an active frontage to the street which would be acceptable. The proposed materials of brick and re-constituted stone would be acceptable and the active frontages along Camberwell Road and Blucher Road would animate and enliven these spaces, as the existing building in this location contributes very little to either frontage. The facades to the commercial units would be provided with signage zones behind the glazing, and the individual occupiers would likely need to apply for separate advertisement consent in the future; a condition is recommended preventing the glazing to these units from being obscured or otherwise covered to retain views through. The elevational design of the new building at 252 Camberwell Road would be appropriate and would fit well with the existing terrace.
- 129 Blocks B and C would be well detailed and the use of brick would be appropriate and contextual. The provision of balconies and metal mesh screens would add visual interest and block C facing the courtyard would have a well-defined base. The northern and western elevations of block C have been amended to provide additional fenestration to give visual interest as these would be visible from the surrounding area. Overall it is considered that these would be attractive, well-designed buildings which would contribute positively to the development. As set out above the detailing of the extensions and alterations to block D are considered to be acceptable and no objections are raised to the elevational design of proposed block E which would be contemporary and functional in appearance.

Heritage assets

- 130 Saved policy 3.15 of the Southwark Plan requires consideration to be given to conservation of the historic environment, and 3.18 of the Southwark Plan affords protection to the setting of listed buildings, conservation areas and world heritage sites.
- 131 The listed church adjoins the southern boundary of the site and although the building has many original internal features, it has little detailing on all of its elevations and even the front elevation is expressed as a simple single bulk extended to contain the lobby from the main body of the building. There are few additional features to this lobby block on its main elevation other than the main canopy which has lost its original fascia, and it is noted that the listing description mostly refers to the significance of the interior of the building.
- 132 The proposal would not harm the external appearance of the building and as most of its significance is its internal design, no harm would be caused to that. Paragraph 129 of the NPPF states that: "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal." As the development will not harm the significance of the heritage asset there are no objections on the grounds that the building will affect the setting of a listed building.

Design Review Panel (DRP)

- 133 An earlier version of the proposal was presented to the DRP in May this year. In summary, the Panel welcomed a comprehensive approach to this site and endorsed a mixed-use proposal in this location, but felt that it appeared overly dense and the extent of development should be reviewed. A number of issues were raised.
- 134 *Layout:* The general approach was endorsed but the scheme not respond to its industrial archaeology and the parking location was inappropriate. Dual aspect flats and retention of block D were welcomed, but the panel felt that more of the existing warehouse should be retained. Concerns were raised regarding the legibility of the site and interaction between the uses, and the separate blocks should have their own identities.
- 135 The pedestrian link from the centre of the site to Blucher Road was supported but the link building between blocks B and D should be omitted. The 'podium' extending to the rear of block A constrained access to the site and placed service functions on the main access route into the site. The termination of the view on the axis with the main entrance needed to be more carefully considered. The Panel acknowledged that they were not able to see the detailed layouts of the units but welcomed the opportunity to review the scheme again at an early stage.
- 136 *Massing:* The Panel supported placing the greatest mass next to the railway viaduct but questioned the massing of blocks B and C. Concerns were raised that block C would be out of scale with the retained warehouse and overbearing to the courtyard. Concerns were raised regarding their proximity to the site boundaries with limited window openings and long term outlook could be compromised without a co-ordinated approach. The panel considered the return arm to block B should be omitted.
- 137 The site layout remains as per that which was presented to the Panel in May. Further landscaping details have been provided, together with details of how the servicing for the various uses would be managed. The massing of block C has been reduced since it was presented to the Panel and it has been lowered next to the retained warehouse in order to create a more incremental change in scale. The scheme has not been re-presented to the Panel.

Trees and landscaping

- 138 An arboricultural impact assessment has been submitted with the application which details that there are 3 category C trees on the site, all of which would be removed. Off-site there is a row of eight trees along Blucher Road including a large category B London Plane tree (T8) growing close to Camberwell Road. There are no objections to the loss of the three existing trees on the site as these are considered to be of limited amenity value. As part of the landscaping proposals 21 new trees would be planted including three on Camberwell Road in front of block A which would be secured through the s106 agreement. The trunk of only one of the trees would be set back 5.5m from the building as required by the Southwark Streetscape Design Manual, with the other two being located 5.02m and 4.5m from it. In the event that this proves to be unacceptable to TfL, it is recommended that the s106 agreement include a requirement for the trees to be planted elsewhere within the vicinity of the site.
- 139 Two of the mature trees along Blucher Road could be affected during construction works (T8 and T13 – Cherry). The most important of these is the very large Plane tree next to Camberwell Road and which is managed by Southwark Housing. Facilitative pruning would be required to remove a small portion of this tree's crown and in order to reduce the likelihood of complaints regarding shading and proximity post occupation. A tree survey submitted with the application notes that this tree has cable bracing which requires further investigation and given that such pruning work would not necessarily be

required were it not for the proposed development, a condition is recommended requiring the re-installation of any safety cabling to ensure the tree would be in a suitably healthy state following completion of the development.

- 140 The footprint of Block A would lie within the root protection area of tree T8 therefore a pile foundation design would be required, together with an investigation of tree root locations prior to any mechanical excavation taking place. These matters can be addressed by way of conditions in the event that planning permission is granted, and these have been included in the draft recommendation.
- 141 The proposed landscape layout would provide an appropriate amount of green amenity space within communal and private space at ground and 2nd floor terrace level, together with balconies. Other features would include a tree lined courtyard with public art, a central courtyard with lawns, hedging and focal specimen tree, defensible planting to ground floor terraces, a play area, cycle parking and timber benches as part of the internal streetscene. Overall the hard and soft landscaping has design merit and would provide a net improvement to amenity. There were initially concerns that the entrance to the site would be dominated by hard surfacing, and the plans have been amended to incorporate planting and an additional tree at the side of the Nags Head public house.

Planning obligations (S.106 undertaking or agreement)

- 142 Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's adopted and draft Planning Obligations SPDs.

Topic Area	SPD Requirement	Applicant's Offer
Education	£312,833	£ 312,833
Employment in the development	£26,170	£ Applicant to provide own WPC
Employment during construction	£155,466	£ Applicant to provide own WPC
Employment construction management fee	£11,766	£ 11,766
Public open space,	£44,106	£44,106
children's play,	£22,683	£22,683
sports development	£173,167	£173,167
Transport strategic	£112,157	£ 112,157
Transport site specific	£108,625	£ In kind works to the value of no less than £270,730
Public realm	£149,625	£ In kind works as set above.
Health	£191,248	£ 191,248
Community facilities	£34,371	£ 34,371
Total	£1,342,217	£1,354,697 (includes in-kind public realm and transport works and work place co-ordinators)
Admin fee (2%)	£26,844.34	£27,093.94

- 143 At the request of the council's Highways Development Management Team the applicant would undertake in-kind works to the value of £270,730 in place of the transport site specific and public realm contributions. The works would include improvements to the access from Camberwell Road, re-paving, lighting and tree planting along Camberwell Road and Blucher Road, and reinstatement of a redundant access outside 252 Camberwell Road. A detailed specification would be required through a s278 agreement which should be referred to in the s106 agreement.

- 144 As stated a contribution towards a car club space and 3 years membership for each eligible adult within the development would be required. The site is not within an archaeological priority zone and the Council's archaeologist has confirmed that no archaeological contribution is required in this instance as only building recording would be required.
- 145 In the event that the legal agreement has not been signed by 13 February 2015 it is recommended that the Head of Development Management be authorised to refuse permission, if appropriate, for the following reason:
- 146 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 (2013) and the Planning Obligations SPD (2007).

Mayoral Community Infrastructure Levy (CIL)

- 147 S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL as a material 'local financial consideration' in planning decisions. The requirement for Mayoral CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail.
- 148 The proposed development would include a CIL chargeable area of 11,256sqm therefore a CIL payment of £415,166.30 would be required.

Sustainable development implications

- 149 Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy; it requires developments between 2013 and 2016 to make a 40 per cent improvement in carbon dioxide reductions over the 2010 Building Regulations (or a 35 per cent reduction based on the 2013 Building Regulations). 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. An Energy and Sustainability Statement has been submitted with the application including Code for Sustainable Homes (CSH) and BREEAM pre-assessment indicators. Further technical information has been submitted following concerns raised by the GLA.

Be lean - use less energy

- 150 The energy statement details how the scheme would incorporate a number of passive measures aimed at reducing the amount of energy required. These measures would include good levels of insulation, high quality glazing to minimise heat loss and maximising daylight to living spaces whilst reducing summer solar gain. As a result of these measures the development would reduce carbon dioxide emissions by 0.36 per cent when compared with the baseline situation of a scheme compliant with the 2013 Building Regulations.

Be clean - supply energy efficiently

- 151 A site-wide combined heat and power (CHP) system would be used which would be installed in the southern part of block C and there would be efficiencies in using this

system because the different uses within the site would place loads on the system at different times of the day. It is estimated that at least 55 per cent of the total heating within the site would be provided by the CHP, with the remainder to be provided by conventional gas boilers. This would result in a reduction of 33.73 per cent when compared with a scheme compliant with the 2013 Building Regulations. The statement advises that there is a proposed district energy scheme within 1 kilometre of the site; it is proposed to install pipework to the site boundary which would enable future connection to a district energy centre scheme and it is recommended that this be secured through the s106 agreement.

Be green - use renewable energy

- 152 The energy statement considers a range of renewable energy technologies but found a number of them to be unsuitable. The scheme would incorporate a minimum of 160sqm of photovoltaic panels on the roof of block A which would reduce the carbon dioxide emissions by 1.26 per cent compared to a Building Regulations compliant scheme. This would equate to 3.27 per cent of the development's energy requirement being met through renewable sources, well below the 20 per cent target in the Core Strategy. However, a combination of the lean, clean and green measures would result in a 36.13 per cent reduction in carbon dioxide emissions when compared with a 2013 Building Regulations compliant scheme which would comply with the London Plan requirements.
- 153 Strategic policy 13 of the Southwark Plan requires all residential develop to achieve Code for Sustainable Homes level 4 and requires the workshop and retail space to achieve at least BREEAM 'excellent'. It requires major developments to achieve a reduction in carbon dioxide of 20 per cent using on-site or local low and carbon zero sources of energy, to reduce surface water run-off by more than 50 per cent, and housing developments must achieve a potable water use target of 105 litres per person per day.
- 154 The pre-assessment indicators submitted indicate that CSH level 4 for the flats and BREEAM 'excellent' for the commercial space could be achieved and conditions are recommended requiring certification to demonstrate that these standards have been met. Surface water run-off would be reduced by 50 per cent and it is estimated that less than 105 litres of potable water per person per day would be used within the residential units through the use of water saving sanitary ware and appliances.

Archaeology

- 155 The site is not located within an archaeological priority zone and is in an area which for much of its life it is likely to have been agricultural land. A site to the south of Medlar Street which is to the south of the application site and within the area of historic settlement of Camberwell has recently been evaluated and no archaeological remains were identified. As such the application site has a lower potential for remains and has been development over time, leaving little open, undisturbed land between buildings and what undisturbed land there is likely to have been impacted by services. No archaeological conditions are therefore necessary, but the buildings appear to be the survival of a former joinery workshop and should be recorded prior to demolition, therefore conditions are recommended to secure building recording and a timely report on these works.

Ecology

- 156 Strategic policy 11 of the Core Strategy 'Open spaces and wildlife' seeks to improve, protect and maintain a network of open spaces and green corridors and to protect important open spaces, trees, woodlands and site of importance for nature conservation. Saved policy 3.28 of the Southwark Plan requires biodiversity to be taken into account in

the assessment of all planning applications and requires the submission of ecological assessments where relevant. An ecological appraisal and bat roosting survey have been submitted with the application.

- 157 The ecological appraisal is based on a desktop study of the area and a walkover survey of the site and its surroundings conducted on 2nd July 2014. The report concludes that the site comprises wholly buildings and hard standing with small patches of disturbed ground which have become colonised by species such as Buddleia, Nettle and Bindweed. None of these are suitable for nesting birds and there was no evidence of nesting birds observed on the site. The report recommends that if possible, demolition should take place outside of the bird nesting season or if not possible, checked carefully 24 hours before demolition takes place.
- 158 The bat roosting survey details how an internal and external inspection of all buildings and nearby trees was undertaken and concludes that the proposed development represents a low probability of harm to bats and that no further survey is required.
- 159 Both documents have been reviewed by the Council's Ecology Officer who has recommended a number of conditions including for bird and bat boxes and green and brown roofs and these form part of the draft recommendation.

Contaminated land

- 160 In the past the site has been used as a coke works, wheel and axle works and is currently in light industrial use. A desk-top study and ground investigation report have been submitted and the ground investigation report advises that remediation works would be required in the proposed soft landscaped areas within the development. The report has been reviewed by EPT and a condition is recommended requiring details of a remediation scheme to be submitted for approval. The report has also been reviewed by the Environment Agency (EA) which has recommended further conditions in relation to piling and foundation design in order to protect ground waters and these have also been included in the draft recommendation.

Air quality

- 161 The site is located in an air quality management area (AQMA) and an air quality statement has been submitted with the application. It considers the existing air quality environment of the proposed development site and identifies likely mitigating measures that may be required. The statement has been reviewed by EPT and further information is required, which it is recommended be secured by way of a condition.

Flooding

- 162 The site is located partially in flood zones 1, 2 and 3 and a flood risk assessment (FRA) has been submitted. It has been reviewed by the Environment Agency (EA) which has confirmed that there is no objections to the application on flood risk grounds. The Council's Flood and Drainage Team also report no objection to the application, and recommend a condition that the development must be carried out in accordance with the FRA.
- 163 The development would incorporate a sustainable urban drainage scheme (SUDs) including porous surfacing with capacity for underground attenuation using sub-bases capable of storing water and porous tree pits. Further information is required however, and it is recommended that this be secured by way of a condition.

Statement of community involvement

- 164 A statement of community involvement (SCI) has been submitted setting out consultation which the applicant carried out before the application was submitted. It advises that a news letter was distributed to 1,350 homes and businesses in the area, informing people of the proposals and inviting them to attend a public exhibition. The exhibition was held at the site over two days on 1 and 2 July 2014 between 2pm-8pm and a questionnaire was provided. The ward councillors were contacted and offered a briefing, and were invited to the public exhibition.
- 165 Approximately 35 people including a ward councillor attended the exhibition, and 13 people completed the questionnaire. The questionnaire revealed that there was overall support for the redevelopment of the site and that the proposal should be of a high quality. Meetings were held with the Chair of the SE5 Forum and the forum's annual general meeting (AGM), Camberwell Society Planning Committee, and Elmington Tenants and Residents Association Committee. Feedback on the proposals was positive, although it appears from the SCI that no comments were made by the Camberwell Society or by the SE5 forum AGM.

Conclusion on planning issues

- 166 The site is presently occupied by Scena Productions, although it is largely used for storage and Scena is in the process of relocating to a new premises owing to the disparate arrangement of buildings across the site and accommodation provided at various floor levels. It is recognised that there would be a large loss of B class floorspace on the site as a result of the proposal, however it would introduce a mix of uses including B1 class, retail and community use and would have the potential to generate twenty more jobs than it currently supports. Moreover, the proposal would contribute to the stock of housing in the borough, including a policy compliant amount of affordable housing. The site is not located within a town centre, the central activities zone or a recognised business district and on balance, the principle of the proposed development is considered to be acceptable in principle.
- 167 There would be some limited instances where the quality of accommodation would be somewhat compromised owing to the proximity to site boundaries, but on the whole it is considered that a good standard of accommodation would be provided including wheelchair accessible units and a policy compliant mix of family housing. The proposal would be of a good standard of design which would preserve the setting of the adjacent listed building and would not unduly compromise the ability of the adjoining site to be developed. In light of this although the expected density range would be exceeded, no objections are raised. There would be no significant loss of amenity to neighbouring occupiers, no adverse transport impacts would occur, and toolkit compliant planning obligations would be provided. The proposal would be acceptable in relation to sustainability requirements, trees, ecology, archaeology and flood risk, and a condition is recommended in relation to air quality. For the reasons set out above, on balance the proposal is considered to be acceptable and it is recommended that planning permission be granted.

Community impact statement

- 168 In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.
- a) The impact on local people is set out above.

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

Consultations

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

Consultation replies

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

Summary of consultation responses

Neighbours and local groups

One representation has been received from the adjoining church objecting to the application on the grounds that it would severely compromise the church's future ability to develop its land to the south of the application site.

Internal services

Ecology officer

The ecological appraisal and bat report are acceptable and their finds are agreed. The Ecological Appraisal makes a number of recommendations which are best dealt with through planning conditions. The design and access statement and flood risk assessment refer to SUDs and green roofs, the inclusion of which are welcomed. One of the roofs plans (Block C) although a biodiverse roof is more desirable. Would accept a sedum roof as long as the other two roofs are high quality biodiverse green roofs.

Local economy team

Initial response - serious concerns and objections to this proposal which would result in a permanent loss of employment space. Planning policy resists the loss of employment space on this site, which fronts onto Camberwell Road, which is a classified road, and is also located within the Camberwell Action Area. The current employment use, while unusually low density, contributes to a diverse town centre economy and while the principle of mixed use development is welcome, the redevelopment of the site has the potential to add significantly to the density of employment uses and increase the provision of high quality flexible small business space, for which there is a continuous demand locally and across London. The proposed loss of employment space on this site would permanently reduce the potential for jobs, business growth and investment in the Camberwell Action Area and is unacceptable from a local economy perspective.

The applicant has argued that they believe an exception should be made with regards to Southwark's stated policy to resist the loss of employment floorspace because the site would not be suitable for re-use in its current state for various reasons. However, there is a requirement for the site to be unsuitable for both re-use and redevelopment as commercial floorspace in order for this exception to be valid. The desirability of mixed use on this site to contribute to meeting Southwark's housing need is acknowledged. However, no case has been made to set out why additional commercial floorspace cannot be reprovided on site.

The case for retaining only a quarter of the space available for commercial floorspace in the new plans appears to be based on the fact that the reduced floorspace would still have the potential to support more full-time jobs than is currently present via the existing occupiers. However, the estimated number of employment jobs that can be supported

through the proposed plans is significantly lower than the amount of jobs that could have been supported through the site if the current level of employment floorspace was retained in the site's redevelopment.

Follow-up response following the submission of additional information

Significant concerns about the scale (in terms of maximisation and commercial viability to an operator) and design (in terms of translation to a successful cluster) currently proposed. Would also endorse a requirement for the legal agreement to require approval of a management strategy for the commercial space at an appropriate stage.

Environmental protection team formal consultation [noise / air quality / land contamination / ventilation]

Recommend a number of conditions relating to construction management, contaminated land, internal noise levels and noise levels to amenity areas. A revised air quality assessment should be submitted before permission is granted.

Flood and drainage team

The flood and drainage team has no objection in principle to the development proposals. Recommend a condition stating that the development shall be undertaken in full accordance with the FRA prepared by Robert West (dated 24/7/14), including requirements that the floor levels shall be as per those provided in Table 3.3, and that the surface water runoff from the site shall be limited to 50 l/s through use of sustainable drainage methods as detailed in the FRA.

Planning policy team - initial response:

Viability issues: The report states that the buildings are in poor condition and not fit for modern business use and would be too expensive to refurbish for modern day requirements. There may be contamination which will add to the expense of refurbishment (question whether any reports being undertaken). The feasibility studies for new office development, new industrial development and an industrial refurbishment are not formal valuations, but they give an indication that these options are not viable. The applicant should also do an appraisal of a mixed use scheme, to show the cross subsidy of the residential to the commercial elements. The report states that Building G1 is being retained and used for artists' studios - there is clearly demand for this type of use and the report states that this will be subsidised with low rents.

Market demand: The report includes some market demand analysis in place of marketing evidence. This is acceptable, given that no marketing has been undertaken due to the state of the current buildings. The report includes up to date details (from Focus database) of the availability of business floorspace within the market area (end of July 2014). The search ranges (1.5 miles for office, 5 miles for industrial) are considered acceptable. There is 13,551sqm of office and average time on the market is one year. There is 66,840 sqm of industrial space and an average time on the market is 2 years. The information shows that there is a supply of floorspace available, however we do not know the size/type/quality of this space. There is no detail on rental levels for these properties which we would expect to see in the report. No details on the development pipeline in the area, however this is expected to be very low or nil.

Maximising the employment offer: Need to know if the applicant can provide information on the typical local demand from the SME occupiers in terms of space/design requirements and consider the feasibility of exploring a commercial cluster on the site targeting SMEs with modest new building specifications, potentially managed by a small business manager / company such as Workspace group, Regus, Lenta etc. There also seems to be demand for space for artists' studios which needs to be explored further.

Further response following the receipt of additional information:

Concerned that the proposal includes a low amount of replacement commercial floorspace. The additional information provides details of the size, types, quality and sales/rental prices of the availability of industrial and office floorspace over a larger search area. It shows that there is a range of office space available in the wider locality, from small to large, with a higher level of availability in Lambeth, and the majority of this being second hand space, as opposed to new or refurbished space. However, the report explicitly states that '*should permission be granted for a substantial residential development on this site that can subsidise the costs of creating artists studios, then once occupied there will be sufficient demand for the space to continue to be occupied*'. It also states '*should office space be available at a reduced cost by comparison with competing offices available in the area, then there is currently likely to be demand*'. Question the outcome of the viability analysis and would expect the applicant to fully demonstrate that the proposed replacement business floorspace on site has been maximised. There is also an existing D1 use 194 sqm and replacement must be considered.

Management, type and location of proposed commercial floorspace:

The applicant proposes 'shell and core' delivery of the commercial which may provide some flexibility for quasi-industrial / workshop use as well as studios/office type uses, but presents a huge up front cost to a potential tenant. Question if the units could be subdivided and whether the developer made efforts to gather detailed intelligence on the short to medium term space requirements of a range of business sectors to draw up the proposal to address them. The detailed needs and intentions of individual businesses should have been identified through business surveys, proactive contact with them to discuss their floorspace needs and the tailoring of solutions. Kalmars have stated that they have approached active arts group ACS and are in discussions about forming a partnership with them. Query whether ACS has had any input into the design stage of the scheme and if the applicant has approached the existing tenants on site to ask them for feedback on the size, function and design of the units. Request information regarding servicing, consolidation of the commercial units into one block, and request clarification of the management details. Commercial operators and developers are clear that commercial space would only work as part of mixed use schemes if provided in certain ways. For mixed-use development to work, careful consideration needs to be given to the relationship between uses. Residential occupiers and commercial tenants will have different aspirations and requirements which require management.

Highway development management

- 1) Before demolition and construction works begin, details of Construction Logistic Plan shall be submitted to and approved by the Local Planning Authority.
- 2) Before the first occupation of the site, details of alterations to the public highway (Camberwell Road) shall be submitted to and approved by the Local Planning Authority. The highway works shall be constructed in accordance with the approved details.
- 3) The applicant should demonstrate that surface water from the development access road does not enter the public highway and vice versa.
- 4) The public footway at the front of the proposed development is currently in good condition and the developer will be required to resurface to the Councils current standards if it is damaged as a result of their construction works.
- 5) The proposed trees on the public footway appear to be located in the middle of the footway. These should be relocated closer to the carriageway leaving a minimum of 1.8m clear footway width.
- 6) The doors at the south eastern corner of the development appear to open

outwards onto public footway. These would obstruct pedestrian movement and therefore needs to open inwards.

7) The widths of the on site footways need to be at least 1.5m wide.

Informative - Works affecting the public highway: The developer is advised to contact the council's Public Realm Section (tel: 02075252000) about proposed works to footway on Camberwell Road.

Statutory and non-statutory organisations

Thames Water

It has not been possible to determine the waste water infrastructure needs of this application. Should the Local Planning Authority look to approve the application ahead of further information being provided, a condition is recommended. Further conditions relating to impact on water infrastructure, surface water drainage and impact piling are recommended.

Environment Agency - no objections, conditions and informatives recommended.

Metropolitan Police Service (Designing out Crime) - advice provided regarding crime rates in the area. Condition recommended requiring secure by design certification.

Network Rail (Planning) - initial response requiring the developer to liaise with Network Rail to ensure no impact upon the viaduct or train safety. Subsequent response that this would be dealt with post-planning through an asset protection agreement.

Transport for London – TfL is considering whether the access arrangements would be acceptable and whether there would be sufficient on-site turning space. Cycle parking should be provided in accordance with the 2013 London Plan; safeguarding an area of public realm in the site for extending the cycle hire scheme should be considered. The level of disabled parking is agreed. TfL understands that 100 per cent electric vehicle charging will be provided. A travel plan should be secured, together with a servicing management plan. A contribution of £475k towards improved bus services and £48k towards bus stops.

Greater London Authority (summary of conclusion)

The replacement floorspace is significantly less than currently on site. Further evidence should be provided to demonstrate that this is the maximum employment space that can be included in the scheme. Details of how the commercial units will be marketed, delivered and managed, including measures to assist future tenants should be provided. Further information demonstrating that there is not a defined need for an alternative social infrastructure use in place of the clinic should be provided before another use is considered.

Further discussion is required regarding affordable housing following the outcome of viability discussions. The density of the scheme should be calculated in accordance with the London Plan methodology and the Mayor's housing SPD.

The scheme is broadly acceptable in urban design terms, confirmation on detailed elements of layouts are required. Further details on the way the public realm has been designed to allow for inclusive access are required, together with confirmation in relation to the allocation of accessible units and blue badge parking.

Further details are required on how the demand for cooling will be minimised, as well as DER and TER sheets outlining efficiency measures alone. Further details of the delivery timetable for SELCHP should be provided, plus drawings of the proposed site heat

network and location of the site energy centre and details of the CHP unit.

The scheme is broadly acceptable in transport terms. Further cycle parking details are required and confirmation of the reports to be secured in a s106 agreement. There is a s106 requirement in relation to busses.

Human rights implications

- 171 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.
- 172 This application has the legitimate aim of providing a mixed-use development on the site comprising flexible B1 / A1 and D class floorspace and residential. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2064-240 Application file: 14/AP/2948 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department Southwark Council 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 5410 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Gary Rice, Head of Development Management	
Report Author	Victoria Lewis, Planning Officer	
Version	Final	
Dated	22 December 2014	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Strategic Director of Finance and Corporate Services	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Community Services	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team	22 December 2014	

Consultation Undertaken

Site notice date: 28/08/2014

Press notice date: 28/08/2014

Case officer site visit date: n/a

Neighbour consultation letters sent: 26/08/2014

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

EDF Energy
English Heritage
Environment Agency
Greater London Authority
London Fire & Emergency Planning Authority
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)
Rob Taylor
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

Flat 10 Marvell House Elmington Estate SE5 7JD	18 Badsworth Road London SE5 0JY
Flat 1 Marvell House Elmington Estate SE5 7JD	16 Badsworth Road London SE5 0JY
Flat 11 Marvell House Elmington Estate SE5 7JD	19 Badsworth Road London SE5 0JY
Flat 13 Marvell House Elmington Estate SE5 7JD	21 Badsworth Road London SE5 0JY
Flat 12 Marvell House Elmington Estate SE5 7JD	20 Badsworth Road London SE5 0JY
9 Bullace Row London SE5 7HJ	9 Medlar Street London SE5 0JU
5 Bullace Row London SE5 7HJ	12 Medlar Street London SE5 0JU
4 Bullace Row London SE5 7HJ	13 Medlar Street London SE5 0JU
6 Bullace Row London SE5 7HJ	15 Medlar Street London SE5 0JU
8 Bullace Row London SE5 7HJ	14 Medlar Street London SE5 0JU
7 Bullace Row London SE5 7HJ	4 Hodister Close London SE5 0JZ
Flat 20 Marvell House Elmington Estate SE5 7JD	3 Hodister Close London SE5 0JZ
Flat 2 Marvell House Elmington Estate SE5 7JD	5 Hodister Close London SE5 0JZ
Flat 21 Marvell House Elmington Estate SE5 7JD	7 Hodister Close London SE5 0JZ
Flat 23 Marvell House Elmington Estate SE5 7JD	6 Hodister Close London SE5 0JZ
Flat 22 Marvell House Elmington Estate SE5 7JD	2 Hodister Close London SE5 0JZ
Flat 19 Marvell House Elmington Estate SE5 7JD	10 Hodister Close London SE5 0JZ
Flat 15 Marvell House Elmington Estate SE5 7JD	22 Badsworth Road London SE5 0JY
Flat 14 Marvell House Elmington Estate SE5 7JD	11 Hodister Close London SE5 0JZ
Flat 16 Marvell House Elmington Estate SE5 7JD	13 Hodister Close London SE5 0JZ
Flat 18 Marvell House Elmington Estate SE5 7JD	12 Hodister Close London SE5 0JZ
Flat 17 Marvell House Elmington Estate SE5 7JD	10 Medlar Street London SE5 0JU
Railway Arch 330 Blucher Road SE5 0LH	The Nags Head 242 Camberwell Road SE5 0DP

Flat 92 Comber House Comber Estate SE5 0LL
Flat 91 Comber House Comber Estate SE5 0LL
Flat 93 Comber House Comber Estate SE5 0LL
Flat 95 Comber House Comber Estate SE5 0LL
Flat 94 Comber House Comber Estate SE5 0LL
Flat 90 Comber House Comber Estate SE5 0LL
Flat 86 Comber House Comber Estate SE5 0LL
Flat 85 Comber House Comber Estate SE5 0LL
Flat 87 Comber House Comber Estate SE5 0LL
Flat 89 Comber House Comber Estate SE5 0LL
Flat 88 Comber House Comber Estate SE5 0LL
Flat 4 305-307 Camberwell Road SE5 0HQ
Flat 3 305-307 Camberwell Road SE5 0HQ
Flat 5 305-307 Camberwell Road SE5 0HQ
Railway Arch 311 Blucher Road SE5 0LH
Flat 6 305-307 Camberwell Road SE5 0HQ
Flat 2 305-307 Camberwell Road SE5 0HQ
Flat 1 276 Camberwell Road SE5 0DL
Flat 96 Comber House Comber Estate SE5 0LL
Flat 2 276 Camberwell Road SE5 0DL
Flat 1 305-307 Camberwell Road SE5 0HQ
Flat 3 276 Camberwell Road SE5 0DL
Flat 24 Marvell House Elmington Estate SE5 7JD
17 Badsworth Road London SE5 0JY
54 Camberwell Green London SE5 7AS
First Floor Flat 309 Camberwell Road SE5 0HQ
First Floor Flat 11 Medlar Street SE5 0JU
First Floor Flat 315 Camberwell Road SE5 0HQ
52 Camberwell Green London SE5 7AQ
Flat 6 Marvell House Elmington Estate SE5 7JD
Flat 5 Marvell House Elmington Estate SE5 7JD
Flat 7 Marvell House Elmington Estate SE5 7JD
Flat 9 Marvell House Elmington Estate SE5 7JD
Flat 8 Marvell House Elmington Estate SE5 7JD
Flat 4 311 Camberwell Road SE5 0HQ
Flat 3 244-246 Camberwell Road SE5 0DP
Flat 4 244-246 Camberwell Road SE5 0DP
Flat 7 303-305 Camberwell Road SE5 0HQ
Flat 5 244-246 Camberwell Road SE5 0DP
Flat 3 311 Camberwell Road SE5 0HQ
Flat 1 311 Camberwell Road SE5 0HQ
First Floor Flat 278 Camberwell Road SE5 0DL
Flat 1 244-246 Camberwell Road SE5 0DP
Flat 2 244-246 Camberwell Road SE5 0DP
Flat 2 311 Camberwell Road SE5 0HQ
Flat 45 Marvell House Elmington Estate SE5 7JD
Flat 31 Marvell House Elmington Estate SE5 7JD
Flat 30 Marvell House Elmington Estate SE5 7JD
Flat 32 Marvell House Elmington Estate SE5 7JD
Flat 34 Marvell House Elmington Estate SE5 7JD
Flat 33 Marvell House Elmington Estate SE5 7JD
Flat 3 Marvell House Elmington Estate SE5 7JD
Flat 26 Marvell House Elmington Estate SE5 7JD
Flat 25 Marvell House Elmington Estate SE5 7JD
Flat 27 Marvell House Elmington Estate SE5 7JD
Flat 29 Marvell House Elmington Estate SE5 7JD
Flat 28 Marvell House Elmington Estate SE5 7JD
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Flat 42 Marvell House Elmington Estate SE5 7JD
Flat 44 Marvell House Elmington Estate SE5 7JD
Flat 43 Marvell House Elmington Estate SE5 7JD
Flat 4 Marvell House Elmington Estate SE5 7JD
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Flat 37 Marvell House Elmington Estate SE5 7JD
Flat 39 Marvell House Elmington Estate SE5 7JD
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296 Camberwell Road London SE5 0DL
248 Camberwell Road London SE5 0DP
205 Camberwell Road London SE5 0HG
252 Camberwell Road London SE5 0DP
284 Camberwell Road London SE5 0DL
244 Camberwell Road London SE5 0DP
Railway Arch 323 Blucher Road SE5 0LH
278 Camberwell Road London SE5 0DL
282 Camberwell Road London SE5 0DL
280 Camberwell Road London SE5 0DL
309 Camberwell Road London SE5 0HQ
227 Camberwell Road London SE5 0HG
Father Redcap 319 Camberwell Road SE5 0HQ
315 Camberwell Road London SE5 0HQ
217 Camberwell Road London SE5 0HG
209 Camberwell Road London SE5 0HG
207 Camberwell Road London SE5 0HG
211 Camberwell Road London SE5 0HG
215 Camberwell Road London SE5 0HG
213 Camberwell Road London SE5 0HG
8 Hodister Close London SE5 0JZ
36 Castlemead 232 Camberwell Road SE5 0EA
35 Castlemead 232 Camberwell Road SE5 0EA
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Flat 1 Reader House SE5 0JF
Flat 2 Reader House SE5 0JF
Flat 3 Reader House SE5 0JF
Flat 11 Reader House SE5 0JF
71 Camberwell Road London SE5 0EB
Railway Arch 312 Blucher Road SE5 0LH
3 Pearson Close London SE5 0TU
9 Pearson Close London SE5 0TU
5 Pearson Close London SE5 0TU
Flat 13 Reader House SE5 0JF
Flat 12 Reader House SE5 0JF
Flat 14 Reader House SE5 0JF
Flat 16 Reader House SE5 0JG

Flat 40 Comber House Comber Estate SE5 0LJ
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Flat 15 Reader House SE5 0JF
Flat 9 Reader House SE5 0JF
Flat 5 Reader House SE5 0JF
Flat 4 Reader House SE5 0JF
Flat 6 Reader House SE5 0JF
Flat 8 Reader House SE5 0JF
Flat 7 Reader House SE5 0JF
Railway Arch 313 Blucher Road SE5 0LH
1 Pearson Close London SE5 0TU
10 Pearson Close London SE5 0TU
12 Pearson Close London SE5 0TU
11 Pearson Close London SE5 0TU
254-268 Camberwell Road London SE5 0DP
Hall Adjacent Churchmead SE5 0ET
Adjacent 234 Castlemead Camberwell Road SE5 0EB
Basement Flat 276a Camberwell Road SE5 0DL
First Floor And Second Floor 286-292 Camberwell Road SE5 0DL
250 Camberwell Road London SE5 0DP
8 Pearson Close London SE5 0TU
Ground Floor Flat 15 Medlar Street SE5 0JU
The Rampway 232 Camberwell Road SE5 0ED
Flat A First Floor 250 Camberwell Road SE5 0DP
7 Pearson Close London SE5 0TU
14 Pearson Close London SE5 0TU
13 Pearson Close London SE5 0TU
2 Pearson Close London SE5 0TU
6 Pearson Close London SE5 0TU
4 Pearson Close London SE5 0TU
Flat 17 Reader House SE5 0JG
Living Accommodation 242 Camberwell Road SE5 0DP
Railway Arch 314 Blucher Road SE5 0LH
Living Accommodation 319 Camberwell Road SE5 0HQ
Camberwell Library 48 Camberwell Green SE5 8TR
298 Camberwell Road London SE5 0DL
300 Camberwell Road London SE5 0DL
Tenants Room And First Floor Castlemead SE5 0EA
284a Camberwell Road London SE5 0DL
14 Badsworth Road London SE5 0JY
221-225 Camberwell Road London SE5 0HG
Railway Arch 326 Blucher Road SE5 0LH
313 Camberwell Road London SE5 0HQ
305-307 Camberwell Road London SE5 0HQ
201-207 Camberwell Road London SE5 0HG
Railway Arch 325 Blucher Road SE5 0LH
294 Camberwell Road London SE5 0DL
7 Badsworth Road London SE5 0JG
Flat 25 Reader House SE5 0JG
Flat 24 Reader House SE5 0JG
Flat 26 Reader House SE5 0JG
Railway Arch 280 Camberwell Road SE5 0EG
Railway Arch 279 Camberwell Road SE5 0EG
Flat 23 Reader House SE5 0JG
Flat 19 Reader House SE5 0JG
Flat 18 Reader House SE5 0JG
Flat 20 Reader House SE5 0JG
Flat 22 Reader House SE5 0JG
Flat 21 Reader House SE5 0JG
280b Camberwell Road London SE5 0DL
280a Camberwell Road London SE5 0DL
Landor House Tenants Hall 1a Landor House Elmington Estate SE5 7JE
Railway Arch 332 Medlar Street SE5 0JU
Railway Arch 331 Medlar Street SE5 0JU
Railway Arch 327 Blucher Road SE5 0LH
Railway Arch 282 Camberwell Road SE5 0EG
Railway Arch 281 Camberwell Road SE5 0EG
Flat 10 Reader House SE5 0JF
Walworth Bus Garage Camberwell New Road SE5 0TF
30 Bishopsmead 236 Camberwell Road SE5 0EU
3 Bishopsmead 236 Camberwell Road SE5 0EU
31 Bishopsmead 236 Camberwell Road SE5 0EU
33 Bishopsmead 236 Camberwell Road SE5 0EU
32 Bishopsmead 236 Camberwell Road SE5 0EU
29 Bishopsmead 236 Camberwell Road SE5 0EU
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26 Bishopsmead 236 Camberwell Road SE5 0EU
28 Bishopsmead 236 Camberwell Road SE5 0EU
27 Bishopsmead 236 Camberwell Road SE5 0EU

Flat 25 Lamb House Elmington Estate SE5 7JF
Flat 27 Lamb House Elmington Estate SE5 7JF
Flat 29 Lamb House Elmington Estate SE5 7JF
Flat 28 Lamb House Elmington Estate SE5 7JF
Flat 24 Lamb House Elmington Estate SE5 7JF
Flat 2 Lamb House Elmington Estate SE5 7JF
Flat 19 Lamb House Elmington Estate SE5 7JF
Flat 20 Lamb House Elmington Estate SE5 7JF
Flat 23 Lamb House Elmington Estate SE5 7JF
Flat 21 Lamb House Elmington Estate SE5 7JF
274 Camberwell Road London SE5 0DL
276c Camberwell Road London SE5 0DL
Railway Arch 338 Medlar Street SE5 0JU
Ground Floor 286-292 Camberwell Road SE5 0DL
238-240 Camberwell Road London SE5 0DP
Railway Arch 329 Blucher Road SE5 0LH
219 Camberwell Road London SE5 0HG
Rent Office Castlemead SE5 0EA
Flat 1 Keats House Elmington Estate SE5 7JA
Flat 11 Keats House Elmington Estate SE5 7JA
Flat 10 Keats House Elmington Estate SE5 7JA
Railway Arch 339 Medlar Street SE5 0JU
Railway Arch 328 Blucher Road SE5 0LH
Second Floor Flat 309 Camberwell Road SE5 0HQ
Ground Floor Flat 278 Camberwell Road SE5 0DL
Second Floor Flat 315 Camberwell Road SE5 0HQ
Third Floor Flat 309 Camberwell Road SE5 0HQ
Second Floor Flat 278 Camberwell Road SE5 0DL
Ground Floor Flat 11 Medlar Street SE5 0JU
Flat Above 298-300 Camberwell Road SE5 0DL
Flat A 313 Camberwell Road SE5 0HQ
Flat B 313 Camberwell Road SE5 0HQ
Flat C 313 Camberwell Road SE5 0HQ
Flat B 250 Camberwell Road SE5 0DP
Railway Arch 320 Blucher Road SE5 0LH
Railway Arch 319 Blucher Road SE5 0LH
Railway Arch 321 Blucher Road SE5 0LH
Railway Arch 324 Blucher Road SE5 0LH
Railway Arch 322 Blucher Road SE5 0LH
Railway Arch 318 Blucher Road SE5 0LH
105 Castlemead 232 Camberwell Road SE5 0EB
Third Floor Flat 315 Camberwell Road SE5 0HQ
Railway Arch 315 Blucher Road SE5 0LH
Railway Arch 317 Blucher Road SE5 0LH
Railway Arch 316 Blucher Road SE5 0LH
Flat 12 Keats House Elmington Estate SE5 7JA
Flat 11 Kipling House Elmington Estate SE5 7JB
Flat 10 Kipling House Elmington Estate SE5 7JB
Flat 12 Kipling House Elmington Estate SE5 7JB
Flat 14 Kipling House Elmington Estate SE5 7JB
Flat 13 Kipling House Elmington Estate SE5 7JB
Flat 1 Kipling House Elmington Estate SE5 7JB
Flat 6 Keats House Elmington Estate SE5 7JA
Flat 5 Keats House Elmington Estate SE5 7JA
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93 Castlemead 232 Camberwell Road SE5 0EB

Re-consultation: Not applicable

APPENDIX 2

Consultation Responses Received

Internal services:

Ecology Officer
Highway Development Management

Statutory and non-statutory organisations:

Environment Agency
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)
Rob Taylor
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups:

Email representation