

<b>Item No.</b>	<b>Classification:</b>	<b>Date:</b>	<b>Meeting Name:</b>
6.2	Open	24 September 2015	Planning Committee
<b>Report title:</b>	<b>Development Management planning applications:</b>  <b>Address:</b> MANOR PLACE DEPOT SITE, COMPRISING 30-34 PENROSE STREET, 33 MANOR PLACE, 17-21 MANOR PLACE, UNITS 1-21 MATARA MEWS, 38A PENROSE STREET, LONDON SE17  <b>Application 15/AP/1062 for: Full Planning Permission</b>  <b>Proposal:</b> Demolition and redevelopment to provide 270 residential units (Class C3) within new buildings ranging from 2 to 7 storeys, a refurbished 33 Manor Place (Grade II listed) and 17-21 Manor Place and 3,730sqm (GEA) of commercial floorspace, comprising 1,476sqm (Classes A1/A2/A3/B1/D1/D2) within 9 refurbished railway viaduct arches and 2,254sqm (Class B1) within the refurbished Pool House and Wash House (Grade II Listed), with associated works including disabled car parking spaces, cycle parking, landscaping and access improvements.  <b>Address:</b> 33 MANOR PLACE, LONDON SE17 3BD  <b>Application 15/AP/1084 for: Listed Building Consent</b>  <b>Proposal:</b> Conversion of 33 Manor Place (Former Manor Place Baths) into 10 residential units (Class C3) and 2,254 sqm (GEA) of commercial floorspace (Class B1), along with internal and external refurbishment and alterations, including introduction of a mezzanine floor within the refurbished Pool House		
<b>Ward(s) or groups affected:</b>	Newington		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 20/04/2015		<b>Application Expiry Date</b> 20/07/2015	
<b>Earliest Decision Date</b> 27/05/2015			

## RECOMMENDATIONS

1. (i) That planning permission is GRANTED subject to conditions and the applicant entering into an appropriate legal agreement, and subject to referral to the Mayor of London.
- (ii) In the event that the requirements of (i) are not met by 30 November 2015, the Director of Planning be authorised to refuse planning permission for the reasons set out in paragraph 236.

(iii) That Listed Building Consent is GRANTED, subject to conditions.<sup>1</sup>

## **BACKGROUND INFORMATION**

### **Site location and description**

2. The application site is located to the west of Walworth Road and is approximately 1.7 ha in size. The site is bounded by Manor Place to the north, Occupation Road to the east, Penrose Street and Matara Mews to the south, and Penton Place to the west. An elevated railway viaduct running on a north-east / south-west alignment bisects the site.
3. The majority of the site comprises the former Council Waste Transfer Depot which was relocated to a new Integrated Waste Management Facility on Old Kent Road which opened in 2012. The depot now provides temporary storage and parking. Two storey vacant Council offices front Penrose Street to the south.
4. The north-western side of the site includes the former Manor Place Baths which is Grade II listed. Part of the Baths complex (Pool House and Wash House) is currently vacant but the frontage building (33 Manor Place) is in use as a Buddhist Centre. Although not a designated heritage asset, the former Coroner's Court (17-21 Manor Place), located on the corner of Manor Place and Occupation Road, is of historic townscape interest. The application site is not within a conservation area, the nearest being Pullen's Conservation Area to the north.
5. The immediate surrounding area is predominantly residential in character although there are established commercial and light industrial businesses along Occupation Road, Walworth Police Station on Manor Place and a church to the east on Penton Place. Walworth Road is approximately 100m to the east and forms part of the Elephant and Castle Town Centre.
6. The site has excellent access to public transport having a high public transport accessibility level (PTAL) of 6a. Elephant and Castle and Kennington Underground Stations are within an easy ten minute walk of the site. Numerous bus routes serve the site along Walworth Road.

### **Details of proposal**

7. Planning permission and listed building consent is sought for the redevelopment of the site, including refurbishment of 33 Manor Place (Grade II listed) and 17-21 Manor Place, to create 270 residential units and 3,370 sqm (GEA) of flexible commercial space.

### **Residential new build**

8. The new build residential element of the proposal (257 units) would be split between three principal elements: Blocks A-F, which run parallel to the eastern edge of the viaduct; Block G, the L-shaped block to the east of the site; and Blocks J-M, the U-shaped block to the west of the site. The height of the blocks range from 2 to 7 storeys across the site.

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<sup>1</sup> Please note the recommendations for planning permission and listed building consent will be supplied in the addendum report.

### **Residential refurbishment**

9. 33 Manor Place would be refurbished and converted into 10 residential units. The façade of 17-21 Manor Place would be retained and redeveloped to the rear to create a further three units.

### **Residential overview**

10. The residential accommodation would be split across tenures and mix as follows:

	Market	Intermediate	Affordable Rented	Total
1 bedroom	38	24	9	71
2 bedroom	110	36	25	171
3 bedroom	18	0	10	28
Total	166	60	44	270

### **Commercial floorspace**

11. Nine commercial units (934 sqm GIA) would be provided within the railway arches. These are proposed to be in flexible uses across Classes A1/A2/A3 (retail), B1 (office), D1 (community) and D2 (leisure) uses. The remaining commercial floorspace (1,991 sqm GIA) would be provided within the refurbished Pool and Wash Houses (behind and to the east of the refurbished 33 Manor Place). This space would be dedicated Class B1 office use.

### **Landscaping and servicing**

12. The development includes landscaped residential courtyards and new public realm in the form of shared through routes crossing the site. Vehicular access for servicing would be via Manor Place, Occupation Road and Penrose Street. 14 disabled parking spaces would be provided on site. Cycle and refuse stores would be provided within the residential blocks and the remaining railway arches not used for commercial purposes.

### **Revisions**

13. Revisions have been made following consultation on the application and further discussion with officers. The principal changes comprise:
  - Revised Transport Assessment, Travel Plans, Delivery and Servicing Management Plans, Commercial Trip Rates (dated August 2015);
  - Increased number of cycle parking spaces;
  - Reduction in number of wheelchair accessible homes and revised location of disabled car parking spaces, including widening of carriageway on Occupation Road;
  - Addendums to Design and Access Statement providing additional detail on façade treatment to Blocks A-F (June 2015) and Character Areas (August 2015);
  - Addendum to Landscape Strategy;
  - Further details on Affordable Housing offer (set out in cover letter dated 22 June

- 2015);
- Amended floor layout plans
- Further details on Energy Strategy, including layout of district heating network and technical assessment;
- Updated Accommodation Schedules (dated 12 August 2015); and
- Overshadowing Studies for 7-10 Occupation Road Studios (11 August 2015)

**14. Planning history – Manor Place Depot Site (15/AP/1062)**

14/EQ/0040 Application type: Pre-Application Enquiry (ENQ)

Part demolition / part retention of existing buildings and provision of a mixed use development comprising 295 residential (Use Class C3) units, flexible commercial floorspace and associated car and cycle parking

Decision date 20/06/2014 Decision: Pre-application enquiry closed (EQC)

14/EQ/0218 Application type: Pre-Application Enquiry (ENQ)

Part demolition/part retention of existing buildings or provision of a mixed use development comprising 270 residential units, flexible commercial floorspace and associated car and cycle parking

Decision date 15/10/2014 Decision: Pre-application enquiry closed (EQC)

14/AP/3295 Application type: Screening Opinion (EIA) (SCR)

Request for a Screening Opinion in relation to the demolition and the redevelopment of Manor Place Depot, the partial retention of 17-21 Manor Place and retention of 33 Manor Place and the Bath House for residential led mixed use development; which includes the creation of seven commercial units under the railway viaducts and refurbishment of the Bath House building into a commercial premises.

Decision date 27/10/2014 Decision: Screening Opinion - EIA Regs (SCR)

15/EQ/0124 Application type: Pre-Application Enquiry (ENQ)

Part demolition/part retention of existing buildings or provision of a mixed use development comprising 270 residential units, flexible commercial floorspace and associated car and cycle parking

Decision date 18/05/2015 Decision: Pre-application enquiry closed (EQC)

**15. Planning history – 33 Manor Place (15/AP/1084)**

05/AP/0648 Application type: Listed Building Consent (LBC)

Removal of existing partitions and installation of new stud walls

Decision date: 17/11/2005 Decision: Grant (GRA)

05/AP/0646 Application type: Full Planning Permission (FUL)

Change of use of the basement, ground, first and second floors to a Tibetan Buddhist Centre (Place of Worship, Use Class D1) for a temporary period of 5 years [Full Planning Permission]

Decision date 17/11/2005 Decision: Grant

**16. Planning history of adjoining sites - 2-6 Occupation Road**

15/AP/0904 Application type: Full Planning Permission (FUL)

Demolition of existing building and redevelopment to provide 1,112 sqm (GIA) of business floorspace (B1c) and 24 residential units (C3) (18x 2 bed and 6 x 3 bed), alterations to the existing access and commercial parking, provision of disabled residential parking and associated public realm improvements

Decision date: Pending decision

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

17. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use and conformity with strategic policies;
  - Environmental impact assessment;
  - Density;
  - Dwelling Mix;
  - Affordable Housing;
  - Design;
  - Impact on heritage assets and the setting of listed buildings and/or conservation areas;
  - Quality of residential accommodation;
  - Neighbouring amenity;
  - Impact on adjoining and nearby uses on occupiers of proposed development;
  - Transport;
  - Trees and landscaping;
  - Ecology and biodiversity;
  - Archaeology;
  - Land contamination;
  - Flood risk;
  - Energy and sustainability; and
  - Planning obligations

### **Planning policy**

18. The statutory development plan for the borough comprises the London Plan 2015, the Southwark Core Strategy 2011, saved policies of the Southwark Plan 2007 along with Supplementary Planning Documents (SPDs). The National Planning Policy Framework is a material consideration.
19. The following policy designations apply to the site:
- Urban Density Zone;
  - Elephant and Castle Opportunity Area;
  - Elephant and Castle Major Town Centre;
  - Walworth Village Archaeological Priority Zone; and
  - Air Quality Management Area
20. The former depot site is a designated development site, 'Proposal Site 49P,' suitable for redevelopment where residential (Class C3) is the required use with other acceptable uses being Class A retail, Class B business, industrial and warehouse uses, and Class D community and leisure uses.
21. National Planning Policy Framework (NPPF)

Section 1: Building a strong competitive economy  
Section 2: Ensuring the vitality of town centres  
Section 4: Promoting sustainable development  
Section 6: Delivering a wide choice of quality homes  
Section 7: Requiring good design  
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

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

23. London Plan July 2015 consolidated with alterations since 2011

Policy 2.13 Opportunity Areas and Intensification Areas  
Policy 2.15 Town centres  
Policy 3.2 Improving health and addressing health inequalities  
Policy 3.3 Increasing housing supply  
Policy 3.4 Optimising housing potential  
Policy 3.5 Quality and design of housing developments  
Policy 3.6 Children and young people's play and informal recreational facilities  
Policy 3.8 Housing choice  
Policy 3.9 Mixed and balanced communities  
Policy 3.10 Definition of affordable housing  
Policy 3.11 Affordable housing targets  
Policy 3.12 Negotiating affordable housing on individual and private residential and mixed use schemes  
Policy 3.12 Affordable housing thresholds  
Policy 4.1 Developing London's economy  
Policy 4.7 Retail and town centre development  
Policy 4.8 Supporting a successful and diverse retail sector  
Policy 4.12 Improving opportunities for all  
Policy 5.1 Climate change mitigation  
Policy 5.2 Minimising carbon dioxide emissions  
Policy 5.3 Sustainable design and conservation  
Policy 5.6 Decentralised energy in development proposals  
Policy 5.7 Renewable energy  
Policy 5.9 Overheating and cooling  
Policy 5.10 Urban greening  
Policy 5.11 Green roofs and development site environs  
Policy 5.12 Flood risk management  
Policy 5.13 Sustainable drainage  
Policy 5.15 Water use and supplies  
Policy 5.21 Contaminated land  
Policy 6.1 Strategic approach (transport)  
Policy 6.3 Assessing effects of development on transport capacity  
Policy 6.5 Funding Crossrail and other strategically important transport infrastructure  
Policy 6.9 Cycling

Policy 6.10 Walking  
Policy 6.11 Smoothing traffic flow and tackling congestion  
Policy 6.13 Parking  
Policy 7.1 Lifetime neighbourhoods  
Policy 7.2 An inclusive environment  
Policy 7.3 Designing out crime  
Policy 7.4 Local character  
Policy 7.5 Public realm  
Policy 7.6 Architecture  
Policy 7.8 Heritage assets and archaeology  
Policy 7.9 Heritage-led regeneration  
Policy 7.14 Improving air quality  
Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes  
Policy 7.19 Biodiversity and access to nature  
Policy 8.2 Planning obligations  
Policy 8.3 Community Infrastructure Levy

24. Core Strategy 2011

Strategic Targets Policy 1 – Achieving growth  
Strategic Targets Policy 2 – Improving places  
Strategic Policy 1 – Sustainable development  
Strategic Policy 2 – Sustainable transport  
Strategic Policy 3 – Shopping, leisure and entertainment  
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

25. Southwark Plan 2007 (July) - saved policies

Policy 1.1 Access to employment opportunities  
Policy 1.7 Development within town and local centres  
Policy 2.5 Planning obligations  
Policy 3.1 Environmental effects  
Policy 3.2 Protection of amenity  
Policy 3.3 Sustainability assessment  
Policy 3.4 Energy efficiency  
Policy 3.6 Air quality  
Policy 3.7 Waste reduction  
Policy 3.9 Water  
Policy 3.11 Efficient use of land  
Policy 3.12 Quality in design  
Policy 3.13 Urban design  
Policy 3.14 Designing out crime  
Policy 3.17 Listed buildings  
Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites  
Policy 3.19 Archaeology  
Policy 3.28 Biodiversity  
Policy 4.1 Density of residential development  
Policy 4.2 Quality of residential accommodation

Policy 4.3 Mix of dwellings  
Policy 4.4 Affordable housing  
Policy 4.5 Wheelchair affordable housing  
Policy 5.1 Locating developments  
Policy 5.2 Transport impacts  
Policy 5.3 Walking and cycling  
Policy 5.6 Car parking  
Policy 5.7 Parking standards for disabled people and the mobility impaired.

26. Southwark Supplementary Planning Documents  
Sustainability Assessment 2009  
Design and Access Statements 2007  
Section 106 Planning Obligations/CIL 2015  
Sustainable Transport 2010  
Affordable Housing 2008  
Residential Design Standards (0011  
Sustainable Design and Construction 2009  
Elephant and Castle SPD / Opportunity Area Planning Framework (OAPF) 2012

### **Principle of development and land uses**

27. At the heart of the NPPF is the presumption in favour of sustainable development. Amongst the key themes in achieving sustainable development are ensuring the vitality of town centres, promoting sustainable transport, delivering a wide choice of high quality homes and delivering a good design.

### **Policy context**

28. The site is located within an Opportunity Area where redevelopment of brownfield sites for high quality mixed use development is strongly supported by regional and local planning policy. The London Plan considers Opportunity Areas to be “the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility” (Para. 2.58). Policy 2.13 advises that development proposals within Opportunity Areas should contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity including supporting wider regeneration (including in particular improvements to environmental quality) and integration of developments to the surrounding area.
29. Southwark’s Core Strategy reinforces the London Plan aspirations for development within Opportunity Areas which are targeted as growth areas within the borough where development will be prioritised. The Core Strategy sets out the council’s vision for the Elephant and Castle Opportunity Area which is for redevelopment into an attractive central London destination and a more desirable place for both existing and new residents with excellent shopping, leisure and cultural facilities. Strategic Targets Policy 2 of the Core Strategy seeks around 45,000 sqm of additional shopping and leisure space within the Elephant and Castle Opportunity Area over the plan period.
30. The depot site is no longer required to be used as a waste site, owing to the opening of the larger waste management facility on Old Kent Road, and as such has become surplus to requirements as a civic amenity site. It is identified in the Saved Southwark Plan as ‘Proposal Site 49P, allocated for a residential-led mixed



use development with Class A/B/D uses within the railway arches. The Elephant and Castle SPD/OAPF identifies the site as being within the 'Rail Corridor' Character Area where the depot site (and other opportunity sites in the area) can provide a range of uses, including residential and business. The guidance also strongly encourages the retention of the adjacent Grade II listed Manor Place Baths which would be appropriate for conversion for a non-residential use. Furthermore, redevelopment of the site would provide a good opportunity to integrate new buildings and streets into the surrounding development, creating a new neighbourhood.

31. The site is currently occupied by temporary uses, including vehicle parking and storage which does not represent an efficient use of land nor maximise the development potential of this central urban location. The listed baths buildings are now largely vacant (save for the frontage building – 33 Manor Place) and are in a poor and deteriorating condition. Redevelopment of the site would make an important contribution towards the regeneration of the Elephant and Castle and, importantly, would bring the listed baths buildings back into a viable use. Similarly, the now vacant Former Coroner's Court (17-21 Manor Place) whilst not listed makes an important townscape contribution and would be retained. The principle of redevelopment is therefore strongly supported and is in accordance with development plan policy subject to detailed land use and planning considerations.
32. The council's Elephant and Castle Regeneration Team have confirmed their support of the development proposal, particularly noting the land use benefits and townscape and public realm enhancements that the development would bring. Overall, the team welcome the proposal and consider that the application would play a significant role in delivering the planning and regeneration objectives set out in the Elephant and Castle SPD/OAPF.

### **Housing**

33. The existing buildings on site do not contain housing and therefore the proposal would deliver 270 net new homes which would help meet the Core Strategy housing target of 4,000 new homes within the Elephant and Castle (or 5,000 new homes as defined in the Emerging Southwark Plan). The uplift in new residential units would maximise the use of the site and would make an important contribution to housing supply in the borough.

### **Non-residential uses**

34. The proposal would include a total of 3,370 sqm (GEA) of commercial floorspace (2,925 sqm GIA). The majority of the proposed commercial use would be provided for in the listed structure with 1,991 sqm (GIA) of dedicated Class B1 business floorspace proposed within the refurbished Pool House and Wash Houses which form part of the listed Manor Place Baths building complex. Additionally, nine of the railway arches would be brought into use providing a further 934 sqm (GIA) of commercial floorspace in the form of flexible retail (Classes A1/A2/A3), office (Class B1), and community or leisure (Classes D1/D2) uses. Flexible uses for the arches is sought in order to ensure that they would appeal to a variety of potential occupiers.
35. The inclusion of a range of business and other town centre uses are highly appropriate given the site's location within the Elephant and Castle Major Town Centre and will contribute towards achieving local plan policy targets in terms of

employment provision and new shopping and leisure floorspace. The proposed range of uses fully accord with the land use aspirations for the site as defined in the Elephant and Castle SPD/OAPF and would encourage the activation and regeneration of the railway arches which is a key objective for the Rail Corridor Character Area.

### **Marketing of non-residential uses**

36. The Local Economy Team considers that the new commercial floorspace would make a positive contribution to the local economy and the growth of the existing employment cluster to the west of Walworth Road. However, they have raised a query over the marketing of the commercial space.
37. A Disposal & Marketing Report has been submitted which comments on the local commercial market and outlines a potential high level marketing strategy for the commercial spaces. The Local Economy Team considers that at this stage the marketing proposal isn't clear. Similarly, the GLA requested evidence of organisations the applicant has contacted in relation to the take-up of the space within the listed building to ensure the proposed works to the building would be suitable for future occupiers.
38. Officers consider that this matter can be satisfactorily addressed by the submission of a detailed marketing strategy (to cover the railway arches and listed building) confirming how the space will be marketed, fitted out, and managed.

### **Loss of community use**

39. Permission was granted in November 2005 (Ref. 05/AP/0646) for use of 33 Manor Place, as a Buddhist Centre for a temporary period of 5 years. This building forms the front of the Manor Place Baths complex and would be refurbished and converted in to 10 residential units as part of the redevelopment of the wider depot site.
40. Although the temporary permission expired in 2010, the Buddhist Centre is still in use and as such the proposal would result in a loss of the existing Class D1 space. In this case, the redevelopment of Manor Place depot and adjoining baths was always envisaged to be a residential led development with an element of non-residential floorspace. The proposal allows for the inclusion of replacement Class D1 uses, albeit on a much smaller scale, and taking into account that the proposal would secure the long-term retention of the Grade II listed baths complex by converting them into a viable use, the loss of Class D1 floorspace is considered acceptable in this instance.

### **Environmental impact assessment**

41. A request for an Environmental Impact Assessment (EIA) Screening Opinion was submitted in September 2014 (Ref. 14/AP/3295) pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The purpose of a Screening Opinion is to assess whether a development would be likely to have environmental effects of such significance that an EIA would need to be undertaken.
42. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal

constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development. Schedule 2 Development could require an EIA depending on whether certain thresholds are breached and having regard to the sensitivity of the setting and likely significance of impacts. Schedule 3 of the Regulations sets out that in considering significance of anticipated environmental effects, regard should be had to the characteristics of the development, environmental sensitivity of the location and magnitude and duration of likely impacts.

43. The proposed development was considered against the EIA Regulations and the council confirmed that the likely environmental effects associated with the development would only be of local significance and therefore an EIA would not be required. The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015 came into force on 6 April 2015 which amend the development thresholds for EIA projects. The 2015 Regulations do not raise any new matters that would alter the council's decision in respect of the requirement for an EIA and as such the Screening Opinion issued by the council remains valid.

### **Density and dwelling mix**

#### **Density**

44. Core Strategy Strategic Policy 5 advises that the density for both residential and mixed-use schemes in the Urban Zone should be within a range of 200 to 700 habitable rooms per hectare.
45. The proposed development across the site (i.e. inclusive of new build and conversion) is 525 habitable rooms per hectare based on 1.7 hectare site area (using the council's methodology for calculating mixed use developments). This density sits comfortably within the range expected for developments in the Urban Zone. A higher density on site is likely to be difficult to achieve given the need to protect the setting of the listed former Baths buildings. As such, the proposal maximises the efficient use of land without compromising the setting of important heritage assets.

#### **Dwelling mix**

46. Core Strategy Strategic Policy 7 prioritises the development of family homes. The policy sets out differing requirements for provision of family sized units depending upon geographical area. Developments of 10 or more units within the Elephant and Castle Opportunity Area must provide at least 60% of units with 2 or more bedrooms and at least 10% of units to have 3, 4, or 5 bedrooms. Any studio provision should not be higher than 5%.
47. The proposed development comprises the following mix of units across the site:

<b>Unit Type</b>	<b>Quantity</b>	<b>Percentage</b>
1-bedroom	71	26.3
2-bedroom	171	63.3
3-bedroom	28	10.4
Total	270	100%

48. From the above, it is demonstrated that the proposed residential accommodation provides a high proportion (73.7%) of two plus bedroom units which is welcome. It

also makes an appropriate provision of family three bedroom units. No studio flats are proposed. The development is therefore considered to provide a good mix of units and fully accords with the requirements of Strategic Policy 7.

### **Wheelchair accommodation**

49. The London Plan Policy 3.8 requires 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Saved Policy 4.3 of the Southwark Plan requires a minimum of 10% of units to be provided as wheelchair accessible. The wheelchair units should be distributed proportionally across all tenures and include a range of unit types. Saved Policy 5.7 requires one disabled parking space for each wheelchair accessible unit.
50. The development makes provision for 13 wheelchair units (or 4.8%) with a designated car parking space for each unit. This represents an under-provision of 14 wheelchair units (or 5.2%) from the 10% minimum requirement. The reason for the shortfall is because providing 27 parking spaces would seriously impact on the quality of the landscaped open spaces and public realm within the site. Various car parking options were tested during pre-application discussions and it was concluded that 27 parking spaces could not be provided without serious detriment to the scheme. Furthermore, ensuring that the spaces were convenient and easily accessible to the wheelchair units was problematic. In light of this, the applicant has agreed to make a payment of £400,000 in-lieu of the wheelchair unit shortfall, calculated in accordance with the Council's Section 106 Planning Obligations and Community Infrastructure Levy SPD which makes provision for such a payment when it has been demonstrated that the required amount of wheelchair accessible units is not achievable. The monies would contribute towards funding adaptations to existing housing in the borough. When taking account of the commuted sum offered, the level of wheelchair provision on site is acceptable.
51. Of the 13 wheelchair units, three (1 x 1-bed; 1 x 2-bed and 1 x 3-bed) would be market units, four (all 2-bed) would be shared ownership units and six (4 x 1-bed and 2 x 3-bed) would be affordable rented accommodation. The proposed range of unit sizes across all tenures is welcome. The majority of wheelchair units would be located on the ground floor of the new build blocks with direct access to private gardens. All units located on the upper floors are conveniently located close to two lift cores and have access to private balconies.
52. The six affordable rented wheelchair units would be designed and fully fitted out in accordance with the South East London Housing Partnership Wheelchair Housing Design Guidelines. Due to uncertainty over the demand for wheelchair units in the private sector it is agreed that the 10 market and shared ownership units would be adaptable in that they would be fitted out to a 'base specification' and adaptations made to meet individual wheelchair user requirements (at no additional cost to the wheelchair user). The wheelchair accommodation, including marketing for the adaptable units, will be secured by legal agreement.
53. All the units within the new build blocks would be built to Lifetime Homes standards. However, due to the constraints of converting the listed frontage Baths building (33 Manor Place) and the Former Coroner's Court (17-21 Manor Place), the proposed layout for these flats do not meet all the required criteria. This is considered acceptable given that the affected units would be market accommodation and the public benefit of retaining these buildings outweighs any minor failures in this respect.

## **Affordable housing**

### **Policy context**

54. Core Strategy Strategic Policy 6 requires major developments to provide as much affordable housing as is reasonably possible. It sets a target of 8,558 net affordable housing units to be provided between 2011 and 2026, including 1,400 affordable units within the Elephant and Castle Opportunity Area. In order to achieve this, the policy requires a minimum 35% affordable housing on major developments.
55. Saved Southwark Plan Policy 4.4 is used alongside the overarching Strategic Policy 6. In terms of tenure, affordable housing within the Elephant and Castle Opportunity Area should be delivered at 50% intermediate and 50% social rented units. Saved Policy 4.5 of the Southwark Plan states that for every affordable housing unit which complies with the wheelchair design standards, one less affordable habitable room will be required.
56. The council's adopted Affordable Housing SPD (2008) together with the draft Affordable Housing SPD (2011) provide further detailed guidance to supplement local plan policy and sets out the approach in relation to securing the maximum level of affordable housing provision. The SPDs also give guidance on how to calculate the level of affordable housing proposed. It describes the habitable room calculation for affordable housing purposes, which takes into account an additional habitable room where the size of a room is more than 27.5 sqm.

### **Representations**

57. Local objections have been received primarily concerned about the lack of clarity over the affordable housing offer and whether a viability assessment has been submitted. Furthermore, the submission doesn't address how rents will be kept affordable or why affordable rents [as opposed to social rented housing] should be allowed.
58. Further information has been submitted during the course of the application, including the submission of a financial viability appraisal, to justify the affordable housing offer.

### **Assessment**

#### **Quantum**

59. In total, there are 952 habitable rooms across the development (those habitable rooms over 27.5 sqm have been counted as two habitable rooms), 35% of which equates to 333 habitable rooms which would be the minimum required level of on-site affordable provision. Six of the 13 wheelchair units would be affordable rented and built as fully accessible and therefore the target 333 habitable rooms would reduce by six rooms to 327 habitable rooms. The remaining 10 wheelchair units (six market and 4 shared ownership units) don't qualify for an affordable housing wheelchair discount as these units would be offered as 'adaptable', built to a base specification and offered as general needs housing in the event there is no take-up by wheelchair user(s).

60. The proposal comprises 104 affordable units (or 351 habitable rooms) with 44 rented units located within Block G and 60 intermediate units provided within the Viaduct Block (Blocks A—F) which also contains private market accommodation. The affordable housing is broken down as follows:

Unit	Intermediate (shared ownership)	Affordable Rent	Social Rent
1 bedroom	24	9	0
2 bedroom	36	25	0
3 bedroom	0	0	10
Total Unit (Habitable room)	60 (179)	34 (122)	10 (50)
			104 units (351 habitable rooms)

61. The proposal equates to a total 36.9% on-site affordable provision by habitable room (38.5% by unit), or 39% when taking account of the wheelchair habitable room allowance, which exceeds the minimum 35% policy requirement. The level of on-site affordable housing provision is a particularly positive aspect of the scheme.

#### **Tenure**

62. In terms of tenure, the affordable accommodation would be split between 51% intermediate (shared ownership) and 49% rented accommodation (by habitable room) which broadly complies with the 50:50 tenure split required for developments within the Elephant and Castle.
63. The 60 shared ownership units would be offered in accordance with Southwark's income thresholds. Of the affordable rented accommodation, the one and two bedroom units would be charged at 56.7% and 61.6% of market rent respectively (inclusive of service charges), capped at Local Authority Housing Allowance Levels. This would equate to a rent of £186.68 per week for a one bedroom unit and £250.95 per week for a two bedroom unit (based on market rent values at June 2015).
64. The proposed 10 three bedroom family homes would be social rented accommodation where the rent levels are determined through the national rent regime. The method for calculating the level of rent for this tenure is based on a pre-set formula which doesn't include service charges. The social rented units will be defined in the legal agreement as:

*Housing owned and let by Local Authorities and private Registered Providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which formula rents are determined through the National Rent Regime (meaning the rent regime under which the social rents of tenants of social housing are set by the Homes and Communities Agency (or any successors thereto) with particular reference to the "Guidance for Rents on Social Housing" May 2014, and the "Rent Standard Guidance" April 2015 including Appendix 1 or any subsequent revisions thereof.*

## Financial appraisal

65. Notwithstanding that the proposal would deliver in excess of the 35% policy compliance, a financial viability appraisal has been submitted to demonstrate that the proposal represents the maximum amount that could be reasonably delivered on site at the rent levels specified. As is the case with any development, the ability to make an affordable housing contribution is dependent on its ability to produce a financial surplus over and above a reasonable profit level.
66. The appraisal and its assumptions have been reviewed by the District Valuer (DV). Following negotiation, an agreed position has been reached on the majority of inputs into the appraisal and the DV concurs that the affordable housing offer represents the maximum that can be viably delivered.

## Conclusion

67. The London Plan and Core Strategy require as much affordable housing on-site as is financially viable. The proposal exceeds the minimum 35% policy requirement and officers are satisfied that it has been adequately demonstrated that the proposal is the maximum reasonable amount that could be delivered and to that extent the scheme is strongly supported.

## Quality of residential accommodation

68. Saved Policy 4.2 of the Southwark Plan asserts that planning permission will be granted provided the proposal achieves good quality living conditions, and includes high standards of accessibility, privacy and outlook, natural light, ventilation, space, safety and security, and protection from pollution. This policy is reinforced by the council's Residential Design Standards SPD.

## Internal unit sizes

69. The SPD defines the minimum standards required for internal accommodation, including overall unit as well as individual room sizes. The following table shows the range of proposed unit sizes as compared with the recommended SPD standards.

Unit Size (bedroom / person)	SPD Minimum Unit Area (sqm)	Proposed Unit Range (sqm)
<i>Flats</i>		
1-bed (2 person)	50	50 - 87
2-bed (3 person)	61	64 - 108
2-bed (4 person)	70	73 - 97
3-bed (4 person)	74	95
3-bed (5 person)	86	93 - 138
3-bed (6 person)	95	108 - 114
<i>2 storey houses / Duplex</i>		
2-bed (4 person)	83	88 - 103
3-bed (5 person)	96	113 - 126

70. All the residential units would either meet or, in the majority of cases, exceed the

recommended minimum unit sizes and are provided with sufficient bulk storage. There are however 17 flats which contain individual room(s) that don't meet minimum standards. Seven of these units are located within the listed building where the constraints of converting such a building are acknowledged. Of the remaining 10 new build flats, the open plan lounge / kitchen areas fall marginally below the recommended minimum sizes (between 0.9 and 1.8 sqm shortfall) but the units are provided with larger bedrooms to the extent that they meet or exceed overall unit requirements. When taking this into account and that only a relatively small number out of the 270 units are affected, the minor discrepancies are accepted.

71. The majority of the family sized (3-bedroom) units, including all the affordable rented family units, have separate kitchen/diners. Where open plan living areas are proposed, the rooms are well in excess of the minimum required size and would allow for some separation of activities. Overall, in terms of unit size and layout, the proposal would deliver an acceptable standard of internal accommodation with the majority of dwellings, including affordable units, in excess of minimum standards.

### **Aspect and outlook**

72. A good proportion of the accommodation would have either a double or triple aspect. Across the scheme there are 210 units (or 77%) with dual (or better) aspect and 60 single aspect units (or 22%). All the single aspect flats are smaller one bedroom units rather than family accommodation and none face directly north. They have private outdoor space of at least 5 sqm which somewhat offsets their lack of aspect. Overall, officers are satisfied that the scheme offers a predominance of dual aspect units.

### **Daylight analysis**

73. A comprehensive assessment has been undertaken for levels of daylight and sunlight within the new development. This includes an analysis of the amount of daylight and sunlight reaching each habitable room within the development, as well as the anticipated amount of sunlight reaching communal amenity spaces. The assessment has been carried out in accordance with the guidelines established by the Building Research Establishment (BRE).
74. The residential element of the proposal is split between three principal elements: Blocks A-F, which run parallel to the eastern edge of the viaduct; Block G, the L-shaped affordable block to the east of the site; Blocks J-M, the U-shaped block to the west of the site. Further accommodation is included in the converted former Bath House. The Average Daylight Factor (ADF) test has been undertaken for all habitable rooms.

### **Blocks A-F**

75. Of 313 rooms assessed, 283 (90.4%) achieve the levels of daylight recommended by the BRE. All failures are on the ground, first and second floor and are predominantly the Living/Kitchen/Dining rooms. These results are largely due to the proximity to the railway viaduct to the west and presence of overhanging balconies on Occupation Road. However, the depth of the rooms is also a factor; the majority of living/kitchen/dining rooms span the block and have a dual aspect, with windows fronting both Occupation Road and the Viaduct route. By the third



floor, every room achieves the ADF values recommended by the BRE.

	Pass	Fail	Total
LKD	80	24	104
Living	9		9
Kitchen	9		9
Bedroom	185	6	191
Total	283	30	313

### Block G

76. Of 140 rooms assessed, 123 (87.9%) achieve the daylight levels recommended by the BRE. The habitable rooms that fail tend to be single aspect living spaces that have a recessed balcony or are shadowed by an overhanging balcony. Only 2 of the 88 bedrooms fail to achieve the recommended daylight level, this is likely a result of them being larger and, particularly, deeper than other bedrooms.

	Pass	Fail	Total
LKD	27	13	40
Living	5		5
Kitchen	5	2	7
Bed	86	2	88
Total	123	17	140

### Blocks J-M

77. Of the 293 rooms assessed, 236 (80.5%) achieved the recommended levels of daylight. Consistently low levels of daylight are experienced in bedrooms on the eastern side of Block J, immediately adjacent to the viaduct. Whilst all units in this Block are dual aspect and are configured such that the main living spaces sensibly overlook the courtyard gardens, the level of daylight reaching bedrooms is constrained by the proximity to the viaduct and the deck access arrangement. This includes a number of rooms achieving an average daylight factor at, or extremely close to, zero. These figures should be understood as representing a worst case scenario when the sky is overcast and, in reality, reflections of light from other surfaces will result in daylight entering these properties. The quality of light entering these particular rooms will be influenced by internal decoration and will therefore be dependent on the developer and future owner occupiers. Of 57 bedrooms in this elevation, 25 are lower than the 1% ADF advocated by the BRE.

	Pass	Fail	Total
LKD	82	18	100
Living			
Kitchen			
Bed	154	39	193
Total	236	57	293

### Former Bath House

78. 10 new flats will be created in the Bath House. Of the 26 habitable rooms this

comprises, 22 rooms (84.6%) achieve the recommended levels of daylight. The four rooms that fail are three living/kitchen/dining rooms and a single bedroom. Where rooms fail to meet the recommended levels, the degree of non-compliance is slight. Officers consider that this represents a very good degree of compliance considering the constraints that the listing of the building imposes on residential layouts.

### Summary

79. Overall, the development shows a very good level of compliance (86%) with the daylight standards recommended by the BRE for new residential development. This is true for all blocks, with no discernible differences between tenure or unit size. Where failures occur, units tend to benefit from dual aspect or the level of deviance is slight.

### Sunlight analysis

80. The BRE also set recommendations on the amount of sunlight reaching residential properties. They advise that rooms will benefit from a good level of sunlight if they receive 25% of the total number of sunlit hours that could be expected at a particular location over the course of a year, and 5% of the total in winter. The levels of sunlight reaching each living/kitchen/dining room and each independent living rooms has been tested.

#### Block A-F

	Rooms Pass	Rooms Fail
APSH (25%)	48 (42%)	65
Winter (5%)	65 (58%)	48

#### Block G

	Rooms Pass	Rooms Fail
APSH (25%)	28 (64%)	16
Winter (5%)	29 (66%)	15

#### Block J-M

	Rooms Pass	Rooms Fail
APSH (25%)	47 (47%)	53
Winter (5%)	60 (60%)	40

#### Listed building

	Rooms Pass	Rooms Fail
APSH (25%)	4 (40%)	6
Winter (5%)	4 (40%)	6

81. The results of the sunlight tests are mixed, which is typical for an urban environment. The results for the various blocks are comparable, with the affordable units in Block G achieving slightly better levels of sunlight annually and

in winter.

82. Though the density of the scheme is relatively modest for this location, the proximity to the railway viaduct limits the sunlight received by units at lower levels on either side of the viaduct, whilst overhanging balconies have a shadowing impact on upper floors. The impacts are at least tempered by the fact that balconies in Blocks A-F are triangular in form and have been staggered, whilst the vast majority of units adjoining the viaduct are dual aspect. This is considered a reasonable outcome for an urban location of this nature.

### **Overshadowing of communal gardens**

83. Further testing has considered the sunlight received by communal garden areas. The BRE recommend that 50% of space receives 2hrs direct sunlight on 21 March. The large area of public realm/courtyard space in front of the listed building and the garden space between Blocks J-L and Matara Mews comfortably meet this standard, whilst 38% of the communal space serving Block G reaches this level. Very few residential neighbours currently enjoy this level of sunlight in their private gardens. This is considered to represent a good level of sunlight in communal spaces.

### **Privacy and overlooking**

84. In order to prevent harmful overlooking between residential properties, the Residential Design standards SPD requires developments to achieve a separation distance of 12m at the front of a building and any elevation that fronts a highway and a minimum of 21m separation at the rear of buildings.
85. The separation distances for direct facing main habitable windows within the new development comfortably achieve the recommended distances due to the inclusion of new shared routes and open spaces between the blocks. Planting, railings and low level brick walls would provide defensible space for ground floor units along the viaduct (Blocks A-F) which also help soften the edges of the public route. Similarly, planting would be provided between private gardens and communal courtyards to protect resident amenities.

### **Amenity space**

86. New residential development must provide an adequate amount of useable outdoor amenity space for future residents. In terms of the overall amount of space required, the following would need to be provided in accordance with the Residential Design Standards SOD:
- Minimum 50 sqm of communal amenity space per development
  - For units containing 3 or more bedrooms – 10 sqm of private amenity
  - For units containing 2 or less bedrooms – ideally 10 sqm of private amenity, but where this isn't possible the remaining amount should be added to the communal amenity space total area
  - 10 sqm of play space per child bed space (covering a range of age groups).
87. A development providing 270 residential units should make provision for at least 2,750 sqm of outdoor amenity space calculated on the basis of 10 sqm per unit and 50 sqm of communal space.

## **Private amenity**

88. The proposal provides a total of 3,996 sqm of private amenity space in the form of gardens, balconies or terraces. All the new build units would have access to private amenity space of at least 5 sqm with many of the units having access to much larger spaces, including all the family units. Where balcony provision is below the minimum 10 sqm, the shortfall has been accounted for within the communal amenity courtyards proposed for each block. Six of the 10 units within the listed building do not have access to any private amenity space but no issues are raised with this given the difficulties associated with converting a listed building. Occupiers of these units would have easy access to a large landscaped communal garden (including child play space) to the rear of the listed building. The principal access to the private amenity areas is from the main living areas rather than bedrooms.

## **Communal amenity**

89. 2,322 sqm of communal amenity space would be provided across the development in the form of various landscaped courtyard gardens and roof terraces. On the western side of the development, a central open landscaped courtyard (560 sqm) would be provided to the front of the 'U-shaped' Blocks J-M and include a variety of distinct spaces, including a decked seating area, to cater for a range of activities for all users. This courtyard would be open and available for all future occupiers across the development.
90. Dedicated landscaped communal courtyards would be provided to the rear (south) of Blocks J and M on the western side (972 sqm) and to the rear of Block G (488 sqm) on the eastern side of the development. Occupiers of the Viaduct Block (Blocks A-F) would have direct access to a series of communal roof terraces (total 302 sqm) accessed at fourth floor level which would provide a range of seating areas and child play elements.

## **Child play space**

91. The development would generate a requirement of 671 sqm of child play space based on the GLA's Child Play Calculator broken down as:
- 5 years and younger = 371 sqm  
5-11 years = 190 sqm  
12+ years = 110 sqm.
92. It is proposed to incorporate the 0-11 year old group play on site (total 561 sqm) with play spaces provided within each of the communal courtyards. These will combine a selection of naturalistic play elements and sculptural fixtures such as stepping stones/logs, boulders and balancing objects. The wider communal areas will also provide the opportunity for informal play. It is recognised that providing quality play space for the 5-11 year old group within the Viaduct Block is limited given that the communal space for this block comprises a series of smaller roof terraces. Provision has therefore been made within the large open courtyard on the western side of the viaduct which is easily accessible to all blocks.
93. In terms of play provision for the older 12+ age group, an off-site solution is proposed given that there are a number of open spaces and play facilities within 800m of the site. A payment of £16,610 has been agreed (calculated in

accordance with the S106 Planning Obligations/CIL SPD) to contribute towards the provision of new or improved play facilities in the area.

94. The separation distances for direct facing main habitable windows within the new development comfortably achieve the recommended distances due to the inclusion of new shared routes and open spaces between the blocks. Planting, railings and low level brick walls would provide defensible space for ground floor units along the viaduct (Blocks A-F) which also help soften the edges of the public route. Similarly, planting would be provided between private gardens and communal courtyards to protect resident amenities.

#### **Conclusion on residential quality**

95. The proposed development would provide accommodation that is considered to be of a high standard which, in the majority, includes good sized internal spaces with all units having access to private amenity and/or easily accessible communal outdoor amenity space and doorstep child play space. The daylight and sunlight testing undertaken identifies some shortcomings in terms of compliance with BRE standards but generally the scheme achieves good daylight levels considering the urban context of the site. Furthermore, the predominance of dual aspect flats will improve the quality of the accommodation. Accordingly, officers consider that the overall standard of residential accommodation is acceptable.

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

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

#### **Outlook and privacy of neighbouring properties**

97. A 12m separation would be achieved between the proposed development and existing properties fronting Occupation Road. Elsewhere, a greater separation would exist for those properties along Manor Place and Penrose Street facing the development and therefore meets the recommended distances to the front of buildings. A separation distance of circa 18m would exist between the rear of the new Courtyard Block (Blocks J-M) and the rear windows of residential properties on Penton Place, rising to well in excess of 21m towards the rear of adjoining properties on Penrose Street. An adequate amount of separation would be also maintained between Block G and the rear of adjoining Walworth Road properties. Whilst the recommended 21m distance would not be achieved towards the rear of all adjoining properties, the separation is considered acceptable given the site's urban context. As such, the proposed development is unlikely to unduly adversely affect the privacy of neighbouring properties.

#### **Impact on daylight received by neighbours**

98. An assessment on the amount of daylight received by neighbours surrounding the development site presently and on completion of the development has also been

completed. The potential impact has been assessed at:

- 140 Manor Place, 142-152 Manor Place and 13 Manor Place to the north;
- 238-248 Walworth Road, 250-252 Walworth Road, 260 Walworth Road and 1 Occupation Road to the east;
- 40-64 Penrose Street to the south; and
- 89-103 Penton Place to the west.

99. In accordance with guidance produced by the BRE, the principal test for impact on neighbouring properties is the Vertical Sky Component (VSC) test. This simply considers the amount of daylight falling on the centre of a window, taking account of obstructions, compared to the amount of light that would be expected on a normal, overcast day. The BRE set out that a VSC score of 27% indicates a good level of daylight. Where a proposed development would lead to a reduction in VSC of more than 20% and the resulting level would be less than 27% this would result in a noticeable impact.

#### **140 and 142-152 Manor Place**

100. 101 windows assessed. Only 4 windows experience a reduction in VSC in excess of 20% with the resulting value being less than 27%. These windows are all located at ground floor in the feature corner entrance on the corner with Crampton Street and the scale of impact here is skewed by the fact that the existing VSC levels are well below 27%.

#### **13 Manor Place**

101. 6 windows tested, of which a single window fails to meet the recommended level by virtue of a reduction of 25% down to a VSC of 17%. A further 'No sky line' test- which considers the proportion of a room that would receive daylight- indicates a less noticeable reduction of 14% with around two thirds of the room receiving daylight.

#### **1 Occupation Road**

102. 5 windows tested and both of the ground floor windows, which immediately abut the existing kerb line, would experience a reduction of around 40% with the resulting VSC levels around 18%. Both windows are assumed to serve the same room and the applicant contends that the ADF value for this room would exceed the level recommended by the BRE.

#### **Walworth Road**

103. 56 windows tested along the rear of properties fronting Walworth Road. Modelling indicates that 4 windows will experience reductions in excess of 20% and have a resulting VSC level lower than the recommended 27%. Of the properties affected, the levels of daylight in the existing condition tends to be low. The overall impact of development here is slight.

#### **40-64 Penrose Street**

104. 146 windows tested across 13 properties located immediately to the south of the development site. None of the windows tested experience a reduction greater than 20%, with some windows assessed as having improved VSC scores after development has taken place.

### **89-103 Penton Place**

105. 95 windows assessed across 8 properties located immediately to the west of the development site. The majority of the windows (91.6%) meet the recommended VSC levels and would not experience noticeable reductions in daylight. A small number of windows would experience an increased level of daylight as a result of the alignment of new buildings moving further from their properties, whilst a similar number are assessed as having a minor reduction.
106. At 95 Penton Place, 1 window is determined as experiencing a 24% reduction in daylight, whilst at numbers 93 and 91, each property has 2 windows that experience reductions of a similar magnitude. At 89 Penton Place, 3 windows experience a reduction of between 22 and 34% and the resulting VSC levels are between 13% and 22%.

### **Summary**

107. Overall, the impact on the level of daylight received by neighbouring residential properties is relatively minor and achieving such high levels of compliance is commendable in an urban location on the periphery of the Central Activities Zone. This is partly a reflection of the particular site constraints that have necessitated a relatively low density of development, as well as adherence to the minimum separation distances between properties that are set out in the council's Residential Design Standards SPD.

### **Impact on sunlight received by neighbouring properties**

108. The BRE also set recommendations on the amount of sunlight reaching residential properties. They advise that rooms will benefit from a good level of sunlight if they receive 25% of the total number of sunlit hours that could be expected at a particular location over the course of a year, and 5% of the total in winter. As with the daylight analysis, the BRE advise that where sunlight is reduced to 0.8 times its original value and as a result falls beneath these thresholds, residents would experience a noticeable reduction in sunlight. If the absolute reduction is greater than 4% rooms may appear colder. The BRE recommend that all living rooms with a window within 90 degrees of due south are tested.

### **Impact on neighbouring properties**

109. The only properties experiencing an annual reduction in sunlight hours in excess of 20% are 1 Occupation Road (45%) and 252 Walworth (38%), but in both cases the resulting levels are above the 25% recommended by the BRE; indicative of a good level of sunlight. A number of properties along Penton Place and Penrose Street experience slight increases in levels of sunlight received due to the building line shifting further from the rear of these properties.
110. In winter, when the sun is at a lower angle in the sky, the reductions in sunlight are more pronounced. Properties along Walworth Road tend to experience

reductions in excess of 20% though only a small number of windows affected fall beneath the 5% level recommended by the BRE.

### **Impact on neighbouring gardens**

111. Further assessments indicate that the development will not have a significant impact on the amount of sunlight received in neighbouring gardens. For properties along Penton Place, the proportion of garden receiving more than 2hrs direct sunlight on 21<sup>st</sup> March generally increases after development. The exception to this is 103 Penton Place, which is modelled as having a negligible 0.3% reduction. At 244 Walworth Road, a more noticeable reduction of 7% is anticipated; however 37% of the rear yard will continue to receive the recommended level of sunlight.

### **Overshadowing of artist studios on Occupation Road**

112. Waterslade have prepared a supplementary note examining the potential for overshadowing of the artists studios at 7-10 Occupation Road, opposite the Manor Place depot. Whilst the BRE guidance is primarily related to residential dwellings, it does acknowledge that care should be taken to safeguard access to sunlight for nearby non-domestic buildings where there is a particular requirement for sunlight. Though not explicitly referenced, artists' studios could be considered to have such a requirement.
113. The assessment considers the potential overshadowing effect on 44 windows, assumed to serve 14 separate studios. The assessment asserts that more than half of the studios will experience a reduction of around 50-60% in annual sunlight hours. Whilst this will undoubtedly be noticeable to the users of these spaces, the resulting values for sunlight hours received are almost entirely in excess of the 25% figure recommended by the BRE. A single studio on the ground floor would drop below this recommendation, the resulting figure being 24%. Similarly, whilst there are reductions in the number of winter sunlight hours, there are no instances where the proposed development would lead to a failure to meet the 5% recommended by the BRE.
114. The conclusions depend to an extent on the grouping of windows and assumed number of studios. Correspondence received from the artists suggests that there are currently 20 separate studios operating in the building as opposed to 14, so the impacts on individual tenants could differ from those presented in the report. However, where it has been determined that the Manor Place development will impact on the amount of sunlight entering any individual window, the lowest resulting levels are 23% of annual sunlight hours and 5% for winter hours. Overall, this is considered to represent a good level of compliance with the BRE guidance. Whilst a few windows on the internal courtyard elevation have lower values, these are predominantly north facing and not normally subject to sunlight analysis.
115. Furthermore, consideration has been given to the potential for overshadowing of the internal courtyard space. This analysis indicates that the Manor Place development will have no impact on the proportion of the internal courtyard that receives a minimum of 2 hours direct sunlight in summer or winter.

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

116. The proposed land uses are compatible with those already existing in the locality.



There are no uses in the area that would adversely impact future occupiers of the development, the character of which is entirely in-keeping with existing uses in the area.

### **Noise**

117. Noise and vibration surveys have been undertaken to determine the existing baseline conditions at the site. Road and rail traffic are identified as key sources of both noise and vibration, whilst plant equipment associated with energy provision and commercial premises is also likely to generate an impact. Despite the proximity to the railway, the assessment states that the levels of vibration experienced in the commercial arches and in those residential units closest to the viaduct are consistent with national guidance.
118. The report sets out that the impacts of noise and vibration can be addressed adequately through considered construction and appropriate mitigation measures. It is proposed that a series of standard planning condition are imposed to address noise from plant, internal noise levels and the level of vibration experienced in residential units.

### **Design and heritage issues**

#### **Policy context**

119. The NPPF stresses the importance of good design which is a key aspect of sustainable development (Para 56). Chapter 7 of the London Plan deals with design related matters, in particular Policy 7.1 sets out the design principles required for new development. Policy 7.8 asserts that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
120. The relevant Southwark design and conservation policies include Core Strategy Strategic Policy 12 and Saved Policies 3.12, 3.13, 3.15, 3.17 and 3.18 of the Southwark Plan. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account, including height, scale and massing of buildings, consideration of the local context, including historic environment.
121. Representations have been received raising a number of design related concerns:
  - Height and massing of Viaduct Block
  - Inappropriate cladding and use of materials
  - Angled projecting balconies on Viaduct Block are incongruous
  - Gateway buildings at end of Occupation Road / Penrose Street new route appear insubstantial

#### **Site context**

122. Manor Place is an important development site with enormous potential. The site is bisected by the existing brick built railway viaduct which is an important part of the industrial heritage of the site. In the area to the north of the site, the eastern side of the viaduct has been opened up over time to become a route which has brought industry, commerce and animation to this part of the borough.

123. The depot site is generally landlocked and has limited interface with the surrounding public realm. The main outlook from the site is towards the rear of existing properties on the Walworth Road, Penrose Street, Penton Place and Manor Place. Any future development on the site is therefore likely to be relatively inward looking but should make the most of opportunities to integrate into the surrounding area.
124. The site includes a number of heritage assets. The Grade II listed Manor Place is an important designated heritage asset. The former Coroners Court at the north-eastern entrance to the site is a modest but sound piece of historic townscape with elegant proportions and many preserved features worth of retention. Most of the other industrial buildings on the site have little merit, with the exception of the buildings on Penrose Street, specifically an administration block and garages. The former is a late Art Deco style office block of modest scale that addresses the street positively, the latter is much altered but retains some interesting glazed brick interior.
125. The site is not within a conservation area. The nearest neighbouring heritage assets are the listed building at 33 Penrose Street which also have the undesignated warehouse and postal sorting office nearby. On Manor Place the more recent church at the corner with Penton Place is not so much a heritage asset but it is an important community building and a landmark in the area. To the north of the site on Amelia Street is the Pullens Estate Conservation Area, whilst to the south is the Sutherland Square Conservation Area.
126. The site is identified for regeneration in the Elephant and Castle SPD / OAPF. Broadly, this document sets out the importance of conserving or enhancing the heritage assets on the site, including the Manor Place Baths and the setting of the Pullens Conservation Area. In relation to design and conservation it also advises that:
  - Buildings with larger footprints may be appropriate adjacent to the viaduct but that their massing should be broken down by sub-division of elevations and well articulated and active frontages
  - Building heights should relate to the surrounding context, with an opportunity for heights to culminate on plots adjacent to the viaduct, particularly on the eastern side
  - Pedestrian and cycle routes which link into the surrounding area should be provided
  - Development opportunities should be used to improve east-west links and open up routes through the viaduct as well as a continuous link alongside the viaduct
  - Some green space should be provided on the site.

### **Site layout**

127. In terms of site layout, the two sides of the viaduct have been treated differently in response to their different characters. To the east, the long linear nature of the site defined by the viaduct would be emphasised by a long linear building (Blocks A-F) with a north-south route either side of it. To the east of this, would be a lower 'L-shaped' block (Block G) defining the corner of Penrose Street and Occupation Road with a communal garden at the rear. To the west of the viaduct, the primary focus would be the refurbished listed bathhouse which would form the northern edge of a new landscaped courtyard. The other side of the courtyard would be

enclosed by a 'U-shaped' 5 and 6 storey building (Blocks J-M). To the south of this would be a communal residential garden. This approach to site layout has been captured by the creation of three Character Areas; 'The Courtyard', 'The Viaduct' and 'Penrose Street'. This approach is welcomed as it would ensure distinction, variety and visual interest across the site.

128. Entrance to Occupation Road with a lower scale, timber clad building providing a contemporary transition to the adjacent new linear 'Viaduct Block' (Blocks A-F). At the southern end of the 'Viaduct Block' would be a taller 'tower' element five storeys high. This would have a unique kinked form that would allow generosity to the public realm at the entrance to the 'low line' route proposed alongside the viaduct. It would also feature a small area of timber cladding linking it back to the other 'gateway' buildings. The generosity of the public realm at the southern entrance to the low line would encourage people to use this route rather than the more private and residential extension of Occupation Road.
129. The railway arches would be refurbished and reused as either small commercial spaces arranged in clusters along its length or as refuse or cycle stores. The clusters of commercial uses are welcomed but the cycle and refuse stores could potentially deaden the frontage along sections of this 'low-line' viaduct route unless treated very carefully. Further detail on the design of the ground floor treatments along the low line route (both the viaduct arches and the viaduct block) will be required by condition.

#### **Routes and movement**

130. A through-route linking the two sides of the viaduct is proposed, created by opening up three arches in the viaduct. This connection and the generosity of the space created is welcome as it would make a pleasant contribution to the public realm without compromising the place making potential of the viaduct. Similarly, the way in which the viaduct is treated as the main organising element of the site, defining the primary north-south link which is designed to respond to the borough's aspirations for a new 'low-line' route is also welcomed.

#### **East of the viaduct**

131. To the east of the Viaduct Block would be a smaller north-south route intended for more local movement. This would extend Occupation Road into the site but at the point where it enters the site, access would be restricted to residents only disabled parking and limited service delivery.
132. The relationship between these two parallel routes has been of some concern throughout the pre-application discussions. Officers have been keen to ensure a sense of hierarchy that would encourage footfall along the 'low-line'. It is considered that a number of design features have been incorporated in order to achieve this, including the gateway buildings and the wider public realm at the southern entrance (off Penrose Street) to the 'low-line' and the use of corner balconies to restrict the width of the opening to the Occupation Road link. Furthermore, the detailed design of the streets, including surface materials, boundary treatments and landscaping will contribute to this. These details will need to be reserved by condition.

#### **West of the viaduct**

133. To the west of the viaduct would be a gated street serving the front doors of the ground floor units within Blocks J-M facing the viaduct. Officers initially raised concerns why these units were orientated away from the main courtyard space as gated streets are generally discouraged in terms of urban design and designing out crime. However, the applicant has clarified that these units would also be accessed via a central lobby within Block J. This is important as it allows the units to share a legible Block J address and mitigates over-reliance on the use of the gated route. Indeed, it is intended that the gate to the route would be locked at all times, save for service access, which would be controlled by the site concierge.
134. Officers also queried the impact of private amenity spaces backing onto the main communal courtyard space to the front of the blocks. The design has subsequently been revised to extend the proposed privacy zone of heavy planting and to introduce 1.5m high fences with open railings which would ensure an appropriate balance between privacy and visual permeability. Furthermore, this condition would exist on only one side of the open courtyard space and therefore it is not considered that it would suffer from a lack of natural surveillance of active frontages.

### **Scale and massing**

135. Across the site, building heights would generally be limited to 5 or 6 storeys with the exception of the site edges close the viaduct and to the rear of the listed building. Along Manor Place, the existing Coroner's Court and the frontage of the listed Bathhouse create a streetscape of 3 to 4 storey frontages. Behind each of those buildings, 3 storey timber clad buildings act as a transition to the brick-clad new apartment blocks in the centre of the site. The Viaduct Block would step up from the 3-storey transition building behind the Coroner's Court to a datum height of 5 storeys. Above this, and only visible from the viaduct site, it would modulate up to a height of 7 storeys. These modulations at roof level would allow for roof terraces and a shared rooftop communal amenity space. The tower marking the 'gateway' to the site on Penrose Street would be 5 storeys. The Penrose Street block would be mostly 4 storeys with an additional floor to mark the corner. To the west of the viaduct, two wings of the courtyard block would be 5 storeys with a further storey on the eastern wing closest to the viaduct.
136. This approach to heights across the site is considered acceptable and is in line with the Elephant and Castle SPD/OAPF which advises that "buildings heights should relate to the surrounding context, with an opportunity for heights to culminate on plots adjacent to the viaduct, particularly on the eastern side." The massing of the long Viaduct Block has been considered very carefully, particularly the way in which the building would be experienced at street level given the restricted width of the viaduct route (9m separation between viaduct at ground floor and 7m above).
137. A Design and Access Statement Addendum has been submitted which seeks to show how the elevations could be treated to introduce a greater degree of vertical emphasis to the six points along the elevation where the balconies and communal entrances align. A definitive solution is not offered at this stage, but rather the Addendum presents an architectural 'device' the delivery of which (accompanied by materials) will be secured by condition. This device is welcome as an appropriate way in which to break up the elevation to counteract the horizontal emphasis as originally shown. The four options presented all employ this device but use different materials to do so, including:

- Options 1 and 2 – use of different combinations of dark brick, buff brick and ribbons of perforated metal panels running up the height of the building
- Option 3 – use of a different cladding material (e.g. timber) behind the balconies, running up the height of the building
- Option 4 – use of a coloured cladding material as above and on the balcony soffits.

138. Each of these options has the potential to deliver a greater level of articulation and would bring some vertical articulation down to the ground, thereby not only introducing a vertical rhythm to the elevation and breaking up the elevation, but also contributing to the legibility of the entrances and enhancing the pedestrian experience along this narrow route. Accordingly, officers recommend that detailed drawings of the final preferred option are required by condition prior to commencement of works above grade.
139. The proposed triangular balconies have an important role to play on the elevation as they provide a focus and rhythm to the façade. This feature is welcomed and the manner in which the ‘device’ would relate to them is considered entirely appropriate. Given their distinctive form and potential importance in articulating the appearance of the viaduct building, it is considered that the detailing of these unique balconies is crucial. As such, 1:1 mock-ups of the balconies will be required by condition.
140. Officers previously raised concerns that the residential frontages of the Viaduct Block had been designed to ensure privacy rather than activity or overlooking of the public realm. To address this, the previously proposed high level brick boundary walls have been replaced with railings. Whilst the private amenity spaces would be raised at a higher level than the viaduct route, the revisions would achieve a much better balance between privacy and visual permeability. Furthermore, the revisions would result in a stronger relationship between the amenity space and the public realm without compromising its amenity value.
141. With the exception of the Viaduct Block, across the site the proportions of the ground floors need to be carefully considered, particularly where protruding balconies are proposed at first floor level. In some views, the ground floors of the blocks appear rather squat in proportion, thereby weakening the overall proportions of the buildings and compromising the legibility of entrances. Greater generosity in floor to ceiling heights or careful articulation of materials at ground floor level is required. Although no further revisions have been made to address this point, it is not considered to be of such harm as to warrant a refusal of planning permission and, moreover, the final choice of materials could go some way to overcoming this concern.

### **Architectural design and quality**

142. The predominant building fabric would be brick which is considered appropriate given the context and history of the site. The proposal at this stage contains relatively little detail in relation to all the proposed facing materials and so it will be important to secure this detail by condition.

### **Viaduct Block (Blocks A-F)**

143. The vertical articulation proposed to the Viaduct Block would provide a welcome

balance to the listed building. This approach would create a strong response to the listed Baths building whilst differentiating the eastern side of the development. This allows familial unity across the site whilst also emphasising and enhancing the variety between the three character areas. The introduction of additional materials and further variation in the brick tones would also offer enhanced visual interest and ensure that there is sufficient visual interest across the site.

144. The gateway building at the southern (Penrose Street) end of the Viaduct Block is welcomed in principle. The unique shift in geometry at this point is considered particularly successful. This building would be finished in buff brick which would contrast with the proposed treatment for the rest of the Viaduct Block without jarring uncomfortably.
145. The application is less clear about the proposed treatment to the ground floor of the Viaduct Block and also the material finish to the protruding orange bays at first floor level. The change in colour and geometry of these bays provide visual interest to this elevation and therefore their material finish will be important and will be reserved by condition.
146. The Occupation Road frontage of the Viaduct Block would be treated in a more domestic manner than the viaduct frontage. As such, it would respond well to the lower 'L-shaped' block on Penrose Street (Block G). The architectural treatment of the Occupation Road façade is broken down into bays of differing widths. These bays vary in length and alternating balcony positions, materials and bay windows create interest along this façade. A subtle colour variation in the brickwork forms banding that runs horizontally along the bays and wraps around the balconies. As a result this façade has a greater degree of articulation than the viaduct façade.

### **Courtyard Building (Blocks J-M)**

147. The main façade of the courtyard building would wrap around the central landscaped courtyard becoming a perforated brick frame to the deck access on the southern wing, and wrapping around and over the entrance building. The brickwork would be punctuated with a lighter cladding material that would add a formal character to the courtyard.
148. The introduction of a curving geometry to the eastern block of the courtyard building is welcomed as a way of ensuring some visual interest and distinctive points of reference to the new buildings without competing with the listed Baths building. Similarly, the architectural concept of using horizontal banding to pick up on the articulation of the listed building is strong. Ultimately, the success of this will rely heavily on the quality of the materials used and the detailed design which will need to be controlled by conditions, including the submission of 1:20 bay studies through the façade.
149. The rear elevation of the courtyard building would be finished in buff brick with contrasting panels of vertical and horizontal brick coursing which would offer visual interest and articulation. Other details proposed include overheating shading interventions on parts of the ground floor glazing. Whilst subject to detailed design, this is acceptable on those parts of the building facing the communal garden to the rear of the block and shouldn't compromise the natural surveillance and/or active frontages facing onto this space.

### **Design review panel**

150. December 2014. Initially, the panel raised concerns with the scheme considering it to make an inappropriate response to its urban context, its harmful impact on the setting of the listed building, poor design and inappropriate response to the railway viaduct. The panel therefore requested the see the revised scheme again.
151. A revised scheme was represented to the panel with significant key changes made to the layout of each half of the site (i.e. either side of the viaduct). The panel welcomed the substantially altered approach to the site and endorsed the arrangement of buildings and the architectural strategy for the site. The panel encouraged further minor urban and detailed design changes to better reflect the urban hierarchy, gateways and nodes and further changes have been made.

### **Conclusion on design matters**

152. The existing depot buildings are functional in nature and appearance and do not make a positive contribution to the local townscape. Officers welcome the opportunity for redevelopment on the site and are generally very supportive of the scheme, particularly following the proposed revisions to the western elevation of the Viaduct Block. A number of design conditions will however be required in relation to detailed design and material specification to ensure the delivery of a high quality scheme on this key development site

### **Impact on the heritage significance of the listed building**

153. The Manor Place Baths, attached walls, piers and railings is a Grade II listed structure and an important designated heritage asset within the borough. It includes the main bath building, the boiler room with its chimney and the vast pool room to the rear. The proposal for alterations to the listed baths is integral to the wider redevelopment of the depot site and, accordingly, a Heritage Statement has been submitted to fully assess the impact on this important heritage asset.
154. Paragraph 132 of the NPPF states that “when considering the impact of a proposed development on the significance of the designated heritage asset, great weight should be given the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”
155. The existing building in its current state comprises one remaining part of what was once a much larger complex of baths and washhouses. The former Ladies swimming pool, slipper baths and men’s second-class swimming pool (within the western and rear ranges) were demolished circa 1978 following the construction of the Elephant and Castle Leisure Centre. Hence the remaining building comprises a former administration block, washhouses within the former east range and the men’s first-class swimming pool (“Main Pool Hall”). However, these have been substantially altered, including the infilling of the main swimming pool. Today parts of the building are vacant and much of it is in a poor and deteriorating condition. As such, the primary heritage significance of the listed building lies in its external appearance, particularly the distinctive front elevation facing Manor Place. The building’s complex roofscape, including the clock tower and chimney add interest to this elevation and are an important silhouette in the wider townscape. Although much of the interior has been lost, the remaining features

and the plan form that survive are considered to contribute to its heritage value as they allow an understanding of how the baths and washhouse complex functioned. As such, they should be retained wherever possible. The external appearance of the main pool hall was not intended to be viewed or form part of the wider townscape. As such, it is largely utilitarian in character. It has also been rendered, painted and altered with the addition of modern openings. It is therefore considered to be of limited heritage significance.

156. The proposed alterations to the listed building include the following:

- Change of use of the baths to residential and commercial accommodation
- Minor external alteration to the principal façade on Manor Place
- Creation of a courtyard space within the area between the former administration block and the bathing hall
- Adaption of existing openings and introduction of new openings in the rear elevation of the main pool house and washhouse
- internal alterations at each level.

157. Each of the alterations are considered in turn.

#### **Change of use**

158. The original use of the building as public baths and washhouse ceased following partial demolition in the 1970s and has since been used as local authority offices, a Buddhist Centre, and depot parking and storage. The proposed change of use into residential dwellings would bring the baths complex back into use and secure its on-going optimum viable use, as required by the NPPF. The proposed use of the main pool house as a commercial office space is considered less harmful than its current use for parking and storage and to that extent is strongly supported.

#### **Manor Place façade alterations**

159. The proposed external alterations to this front elevation are limited to general repair and refurbishment. The existing entrances would be reused and sensitively adapted to provide separate access to the residential and commercial uses.

#### **Courtyard space**

160. Sandwiched between the former administration block and the main pool hall is an existing single storey range. It is proposed to demolish this and take the floor level down to basement level to create an open courtyard area for residential amenity. This change would not be visible from the public realm, but it would necessitate the loss of historic fabric. However, this element is of relatively low heritage significance and has been previously altered. Piers and sections of existing masonry would be retained at both basement and ground floors with glazed partitions on the line of the existing walls. This would allow natural light to be drawn into the new residential units whilst retaining the legibility of the original plan form. Although the loss of historic fabric is regrettable, it is considered that the creation of new courtyard amenity space is important to allow the successful conversion of the building into a viable use. Without this change, the new residential units would be dark and lacking sufficient amenity space. It is therefore considered that the harm caused by the proposed demolition is outweighed by the public benefit of converting this part of the building into high quality residential units.



161. A further basement space would be created at the southern corner of the administration block. This would be excavated on the site of previously demolished and in-filled parts of the complex and is therefore not considered to represent unjustifiable harm to the heritage significance of the building.

### **Alterations to rear elevation of Main Pool Hall and Washhouse**

162. The external appearance at the rear of the main pool hall and washhouse is considered to be much less of heritage significance. It is utilitarian in character and has been unsympathetically altered in the past. The wider redevelopment of the depot site would see these rear elevations opened up to public view, fronting onto a new shared open space (The Courtyard). The proposal would reinstate existing openings, adapt modern openings that were previously inserted and create new fully glazed openings. The largely modern cement rendered rear and part return elevations would be relined and clad in timber. These changes would necessitate the loss of some historic fabric but this is considered to be of little heritage significance. The proposal would result in a more active façade with a strong relationship to the public realm whilst retaining the imposing sense of scale and utilitarian character of the existing elevation. The relining of the wall would also improve the insulation and thermal performance of the internal space.
163. The Victorian Society, whilst expressing support for the re-use of the listed building, raise a concern in relation to the architectural treatment of the former pool's exterior. They consider that the proposed timber cladding would be detrimental to the building's appearance and would wrap uncomfortably around the south-western corner of the building.
164. Whilst officers acknowledge this concern, it is noted that the existing rear elevation was never intended to be publicly visible and both the rear and part return elevation referred to have been unsympathetically altered in the past as a result of demolition works and the addition of modern cement render. As such, it is considered appropriate that a clearly discernible modern material should be applied to this elevation in order to allow the front elevation to remain the primary focus and to compliment the modern proportions of the proposed new openings. Indeed, officers consider that the cladding would represent an enhancement to the appearance of the rear of the listed building.
165. Furthermore, it is considered that the rear elevation was never intended to be viewed and both the rear and return elevations have been much altered over time, they are of limited value to the heritage significance of the listed building. As such, recladding these elevations would not cause unjustifiable harm to the heritage significance of the listed building or its special architectural or historical interest. A condition is recommended to secure the submission of samples of all facing materials, including the timber cladding to allow officers the certainty that the timber will be of sufficient quality.

### **Internal alterations**

166. The proposal seeks to retain the key elements of the historic plan form and interior features of high heritage significance in the former administration block to the front of the site. This includes the retention and reuse of the main entrance hall and other secondary stairs. On each level, the remaining plan form would be retained and adapted to create the new residential units and the remaining decorative

materials and features would be kept.

167. The former washhouses and main pool hall to the rear of the site would be converted for commercial use. The unsympathetic modern interventions within the washhouse would be removed to better reveal the original plan layout and allow a full appreciation of the distinctive roof form. These changes are considered to enhance the heritage significance of the washhouses and are welcomed. New mezzanines, a toilet block and lightweight partitions to create meeting rooms would be installed in the main pool house and southern part of the washhouses to create additional useable commercial space. This would still enable the full extent and proportions of both the main pool hall and washhouses and their distinctive roof forms to be experienced and the new additions would be designed to read as distinct from the historic fabric. As such, these aspects of the proposal are not considered to cause unjustifiable harm to the heritage significance of the building.
168. A new opening would also be introduced between the main pool hall and washhouse which would result in some loss of historic fabric but the legibility of the plan form and appreciation of these two distinct spaces would remain.
169. The extensive and utilitarian basement space under the washhouse would accommodate an energy centre. This would allow the reuse of the existing boiler chimney and is considered appropriate. The Heritage Statement advises that the replacement of the existing boiler system would not have any impact on the significance of the building as a heritage asset. However, officers recommend that further details are required by condition to ensure that any new flues or similar would not impact upon the heritage significance of the building.
170. In order to improve the thermal performance of the building, areas of flat roof (in addition to the relining of the rear façade as discussed above) would be upgraded to modern roofing materials and insulation introduced to the gap between external and internal pitched roof materials. The external walls (and floors) to the new residential units in the former administration block would be insulated internally. These works would only impact upon areas that are considered to be of lower heritage significance and therefore the harm can be outweighed by the public benefit of securing the optimum use of the building. The features of much greater heritage significance such as traditional slate roof cladding, glazed lanterns, distinctive exposed roof structure and internal panelling within the main pool hall and washhouses would be retained. Similarly, the existing wall materials in the main entrance hall and staircase in the administration block would remain unaltered.
171. Strategic Policy 12 of the Core Strategy advises that proposals should conserve or enhance the significance of Southwark's heritage assets. Officers consider that the work proposed to the listed building would conserve or enhance this important heritage asset. Where harm would be caused or historic fabric lost, this can be justified by the public benefit of securing the optimum viable use of the building. Furthermore, the proposal would meet the tests set out in saved Policy 3.17 of the Southwark Plan as there would be no loss of important historic fabric; the development would not be detrimental to the special architectural or historic interest of the building; the proposal would relate sensitively to the period, style, detailing and context of the listed building and existing detailing and features of the building would be preserved, repaired, or, if missing, replaced.
172. Historic England confirm they have no comments to make on the proposed works

to the Grade II listed building. Further, the GLA consider that the proposed works would bring the designated and non-designated heritage assets into viable long term uses with sympathetic interventions.

## **Conclusion**

173. The proposal is sensitively and thoughtfully designed, with clear respect for the appearance, style and age of the building. The alterations proposed would result in less than substantial harm to its heritage significance and that this harm would be outweighed by the public benefit of securing its optimum viable use and on-going maintenance and repair. In many areas, the repair and refurbishment particularly along the Manor Place frontage would better reveal its heritage significance. Similarly, the removal of the unsympathetic modern interventions in the washhouse would result in a heritage benefit. The proposal to alter the largely blank and utilitarian rear elevations of the washhouse and main pool hall would better integrate the listed building with the wider redevelopment to ensure that it contributes positively to the public realm.

## **Impact on character and setting of a listed building and/or conservation area**

174. Sections 7 and 12 of the NPPF relate to the design and conservation of the historic environment. Paragraph 137 is particularly relevant to this application which advises local planning authorities to look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. "Proposals that preserve those elements of the setting that makes a positive contribution to or better reveal the significance of the asset should be treated favourably."
175. Saved Policy 3.18 of the Southwark Plan states that planning permission will not be granted for developments that would not preserve or enhance the immediate or wider setting of a listed building or important views of a listed building and/or setting of a conservation area.
176. In relation to the conservation of the setting of the listed Baths building complex and setting of the nearby conservation areas, the proposal is considered to comply with policy. During pre-application discussions, the blocks to the rear of the listed bathhouse were rearranged and significantly reduced in height and consequently the important roof profile and distinctive silhouette of the listed baths building (which is one of the principal factors contributing to its heritage significance) would be preserved. This is demonstrated in the testing of the three key views submitted in support of the application. Although they have not been provided as verified views, they give Officers sufficient comfort that the proposal would barely be visible within the setting of the listed building. As such, it is considered that the setting of this principle elevation and important roof form would not be harmed.
177. To the west of the listed Baths building, a 3-storey entrance gatehouse (adjacent to Block M) is proposed. This is considered to be sensitive to the setting of the listed building whilst creating a suitable entrance to the site as well as contributing to natural surveillance and activity along the new public shared route. It would be modest in scale and clad in timber to match the approach proposed for the rear elevation of the listed building.
178. The Former Coroner's Court (1899) whilst not statutorily listed, is an important

local building and is of some architectural interest as an example of a former public building. Paragraph 135 of the NPPF requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining an application. The proposal would retain and convert this non-designated asset in a sensitive and appropriate manner, celebrating its importance by treating it as one of the 'gateway' buildings. The retention of the building and its sensitive refurbishment is particularly positive feature of the scheme.

179. The existing site also contains another non-designated heritage asset in the form of two memorial stones set into the façade of the existing building fronting Penrose Street. It is considered that they should be retained and re-displayed somewhere prominently within the redevelopment site. A condition is therefore recommended requiring details of the relocation of the memorial plaques.
180. The GLA have confirmed that the proposal raises no strategic issues in terms of the setting of the listed building and preserving the character and appearance of the neighbouring conservation areas.

### **Landscape and impact on trees**

#### **Trees**

181. An Arboriculture Impact Assessment and Tree Protection Plan have submitted. There are no existing trees on site but there are eight large and prominently located Category A and B London Plane trees which form a significant feature to the northern boundary on Manor Place, together with a smaller sapling adjacent to the railway bridge. All these trees are proposed to be retained which is positive.
182. The council's Urban Forester advises that the Arboricultural Assessment and Method Statement Report successfully describe how the adjacent street trees are to be protected such that the proposed development can proceed without damage. The trees' crowns are, in any event, regularly reduced as part of routine cyclical highway maintenance. It is recommended that tree protection measures are secured by condition(s).

#### **Landscaping**

183. A Landscape Strategy and Addendum detail the proposed landscaping scheme which includes new landscaped open spaces and public routes (shared surface lanes) through the site. 10 'character areas' would be created with each area having a distinct character defined by its function, form and material palette (both soft and hard materials).
184. Significant opportunity exists for amenity to be enhanced on the site. The residential blocks would be arranged to form landscaped residential amenity courtyards to the front and rear which include an acceptable amount and quality of communal amenity. Private amenity is confined to gardens and roof terraces, the former providing a green edge facing either side of the railway viaduct. More informal resident courtyards and play areas to the rear of blocks provide screening to adjacent gardens which back onto the site. A generous extension to the public realm would be created outside the rear of the listed Baths buildings which would be well overlooked being situated on the public route through the site. As such, it has the potential to become a successful and well used space. It would also give

the new commercial units a proper address and sense of place.

185. Together with the courtyard areas, the viaduct forms a central defining characteristic of the scheme where lighting is proposed to accentuate its role linking the western and eastern side of the site via the new shared access road. A suitable restrained palette of materials is proposed with the aim of promoting pedestrian priority.
186. Climbing plants are proposed to further soften the railway arches and facing elevations. There is the potential to increase areas of soft landscaping outside the listed Baths Buildings and adjacent to the linear seating wall opposite the Western Courtyard. This would compliment the proposed line of trees bordering the front gardens to the west of the courtyard and would soften the hard surfaced area on this side of the development. Appropriate detailed design details for hard and soft landscaping, including areas of new public realm, and boundary treatments will be required in order to ensure the quality of landscaping aspired to.

### **Ecology and biodiversity**

187. Core Strategy Strategic Policy 11 concerning open spaces and wildlife requires new development to avoid harming protected and priority plants and animals to help improve and create habitat. Saved Policy 3.28 of the Southwark Plan requires that biodiversity is taken into account in all planning applications and encourages the inclusion of features which enhance biodiversity. It also states that developments will not be permitted which would damage the nature conservation value of Sites of Importance for Nature Conservation and local nature reserves and/or damage habitats of priority species. The proposal has no such effect.
188. The council's Ecology Officer has reviewed the submitted Ecological Assessment (which includes an Extended Phase 1 Habitat Survey) and agrees with the findings of the assessment. The site currently has a low ecological value when considering that it mainly comprises buildings and hard standing with no on site trees. No roosting bats were found on site and that existing high lighting levels means that the site is of low value to bats. The Ecology Officer does however recommend that an ecologist is retained on a watching brief during the demolition phase in case any bats are discovered and this can be secured by condition. Furthermore, there are no ecological features on site that require protection.
189. The proposed development has good potential for ecological enhancement with the inclusion of features such as bio-diverse green roofs and walls, native planting, installation of bird, bat and insect boxes and the provision of invertebrate homes, log piles and habitat wall. The implementation of a Sustainable Urban Drainage (SUDs) scheme would also help irrigate the soft landscaping features. Officers recommend that conditions should be attached to any grant of permission to secure ecological enhancement, including a management and maintenance plan and monitoring plan in order to assess the success of new urban habitat features.

### **Transport issues**

190. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved Policy 5.2 of the Southwark Plan asserts that planning permission will be granted for development unless there is an adverse impact upon transport networks; and/or adequate provision has not been

made for servicing, circulation and access; and/or consideration has not been given to impacts on the bus priority network and the Transport for London Road Network (TLRN).

191. The application site has excellent levels of public transport accessibility which is reflected in the PTAL rating of 6a. Walworth Road (approximately 600m to the east) forms part of the Strategic Road Network.
192. Revised transport documentation has been submitted during the course of the application to address comments raised by statutory and local consultees. Local representations were received raising the following:
  - Increased traffic on Occupation Road which is currently barely useable for servicing existing properties
  - Proposal fails to take into account the narrow width of the southern end of Occupation Road
  - Disproportionate amount of disabled parking located on narrow section of Occupation Road
  - Proposal will affect the operations and safety of existing business users
  - Potential for routes through the site to be used as a 'rat-run'
  - A car club bay should be provided on site.

### **Trip generation**

193. The revised Transport Assessment includes predicted trip rates for both the commercial and residential elements of the scheme. Officers are satisfied with the assessment undertaken and agree that vehicle trips associated with the development could be readily accommodated by the local transport network and therefore is unlikely to be any material impact on the highway in terms of trip generation.
194. Transport for London (TfL) are also satisfied that the development, once operational, is unlikely to have a negative impact on the capacity of either public transport or the road network. They did however object to the original proposal to relocate a nearby bus stop (stop 'S') on Penrose Street but the applicant has since confirmed that this is no longer required. A £10,000 payment has been agreed with TfL to contribute towards the installation of a bus shelter at this stop. The payment will be secured through the S106 legal agreement. TfL also request that a Construction Logistics Plan is secured to manage any potential adverse effects on the road network during construction.
195. London Underground (LU) confirm they have no comments to make in terms of protecting LU infrastructure. Network Rail have confirmed they have no objections although any use of the railway arches would need to include provision for access to inspect the arches.

### **Access**

196. The application site currently has five vehicular accesses. Two of the existing accesses would be retained and improved (Manor Place and one on Penrose Street) whilst the other three would be removed and three new accesses created. The proposed five vehicular access points would be arranged as follows:
  - A two-way access point would be created from Manor Place (north-western

- corner) leading into the Western Courtyard;
  - A one-way (northbound) route from Penrose Street into the new 'Viaduct Route' running alongside the eastern side of the viaduct with an exit onto Manor Place;
  - A two-way extension of Occupation Road, with access through the site controlled by bollards, exiting onto Penrose Street.
197. Although the proposal involves a large number of crossovers, the peculiarities of the site, bisected by the viaduct, and the need to ensure Network Rail retain access to the viaduct means that this number of access points is deemed acceptable. The five access points will need to be constructed to the relevant Southwark Streetscape Design Manual (SSDM) standards.
198. The provision of the new Manor Place access (egress) at the northern end of the new Viaduct Route would necessitate the removal of five existing on-street car parking spaces. Similarly, one doctor's parking bay on Penrose Street will need to be relocated to create space for left turning vehicles entering the new Viaduct Route. These changes will require a variation to the existing Traffic Management Order.

### **Vehicular movement**

199. Vehicular access to the site would be limited to disabled drivers, delivery, servicing and refuse and emergency vehicles only. A number of local concerns have been raised that the site, particularly the new 'Viaduct Route,' could be used for through traffic. To ensure the site remains effectively 'car-free' a number of measures are proposed to be in place.

### **Viaduct route**

200. Access to this route would be restricted to refuse collection and deliveries for the residential units in the Viaduct Block (Blocks A-F) as well as servicing for the commercial units located within the arches. To discourage the use of the route as a cut through, only right turn in (from Penrose Street) and out (onto Manor Place) movements would be permitted. The Penrose Street entrance has been designed with a build out to enforce this arrangement. Furthermore, five speed tables have been introduced along the length of the route to reduce the potential for 'rat running' and ensure traffic is kept to a low speed. Surface materials and landscaping will further discourage car use and it is recommended these details are secured by condition. Signage would be provided to inform people of the restricted access. Officers are now satisfied that the revised plans show adequate highway design to facilitate an effective operation of this route ensuring traffic is appropriately directed into and out of the route.
201. It should be noted that an earlier iteration of the design of this route showed retractable bollards positioned at the southern end (Penrose Street) of the Viaduct Route. Officers considered these to lead to potential management problems and could pose greater issues with access; in particular, vehicles not gaining entry and reversing onto Penrose Street. As such, the applicant was encouraged to revise this option.

### **Occupation Road**

202. It is proposed to extend this route southwards through the site with an egress onto

Penrose Street. The northern end of Occupation Road is proposed to become two-way from its junction with Manor Place to the edge of the development site where a turning area is proposed to facilitate refuse collection for the northern end of Block G.

203. The southern end of the route ('Community Street') would be a shared surface area containing 10 disabled parking spaces. Vehicular access to this section would be restricted primarily to disabled drivers as well as emergency vehicles. Access would be controlled by an electronic bollard solution (key fob controlled for disabled drivers). Electronic bollards are also proposed at the southern end (egress) to ensure no vehicles access the site from Penrose Street. Officers consider that the bollards at the end of Occupation Road will prevent traffic using this route to cut through the development site. Similarly, the set of bollards on the exit of this route onto Penrose Street will reduce the number of vehicles crossing the footway.
204. Occupation Road currently narrows to the south of the existing access into the Manor Place Depot site. As part of the highway works, it is proposed to widen the existing southern section of Occupation Road to provide a route of continuous width (circa 7m) for its full length. The new section of Occupation Road (currently within Notting Hill's demise) will be offered for adoption in addition to the new turning head at the end of Occupation Road. Occupation Road, to the south of Nos. 2-6 Occupation Road, would also be resurfaced.
205. The works to Occupation Road will effectively accommodate vehicular trips associated with the development and will significantly improve vehicular access and servicing to existing properties on Occupation Road. Officers consider the revisions made address the concerns raised by Occupation Road users in terms of servicing and access and to that extent will make a welcome improvement to the local highway network. A S278 Agreement will be required to complete the works to Occupation Road.

#### **Manor Place access**

206. Vehicular access via Manor Place would be restricted to refuse vehicles, residential and commercial deliveries and disabled parking (three residential and one commercial space). This access leads to a large landscaped courtyard with a layout that shows an adequate turning area for vehicles to enter and exit the site safely in forward gear. Bollards would be placed in the courtyard at both ends of the turning area to ensure vehicle movements don't occur outside the designated route and encroach on the landscaped amenity areas.

#### **Pedestrian and cycle movements**

207. The main pedestrian and cycle route through the site would be via the new public diagonal route linking the north-western corner of the site (Manor Place) to the south-east (Penrose Street). Three of the viaduct arches would be left open to encourage permeability between the west and east sections of the site. Occupation Road and the new Viaduct Route would provide secondary pedestrian and cycle routes. These shared routes would be designed to ensure appropriate delineation to indicate vehicle 'track' and separate footway to ensure a safe route for all users.
208. The pedestrian footways fronting the development on Manor Place, Penrose



Street and Occupation Road will be resurfaced as part of the highway works associated with the development. Existing street lighting along these roads fronting the development will also be upgraded. These works will be secured by an S278 Agreement.

209. An important objective for the site set out in the Elephant and Castle SPD is to improve east-west linkages and open up routes through the viaduct as currently the viaduct acts a barrier to movement across the site. The proposed site layout would significantly improve permeability and pedestrian and cycle linkages through the site. This is a particularly positive feature of the scheme which will also help to integrate the development into the surrounding streets.

### **Legible London signage**

210. To support sustainable travel, a payment of £6,000 has been agreed with TfL for Legible London way finding signage which will be secured in the legal agreement.

### **Cycle docking station**

211. TfL advise that there is an existing shortage of available cycle docking stations in the area and therefore a contribution towards the provision of a new docking station is required. Following discussions with TfL, a payment of £50,000 has been agreed to contribute towards new or enlarged station(s) in the vicinity of the site. Again, this payment will be secured in the legal agreement.

### **Car parking**

212. The development would effectively be 'car-free' save for 14 Blue Badge parking spaces. Given the excellent public transport accessibility of the site, the 'car-free' nature of the site is welcome. 13 disabled spaces would cater for the residential element of the scheme with 10 parking spaces located on the eastern side of the site in the new 'Community Street' (connecting Occupation Road to Penrose Street) and three spaces provided in the courtyard area on the western side. A further disabled parking space is proposed for the commercial development which would be located adjacent to the concierge facility at the Manor Place entrance to the site. Three active and three passive electric vehicle charging points are also proposed in accordance with the requirements of the London Plan.
213. It should be noted that local objections had been received concerned about disabled parking spaces proposed along the eastern side of Occupation Road, at its southern extent. These spaces are now relocated elsewhere within the site and, as discussed above, the land will form part of a widened Occupation Road. As such, it is considered that the objections raised have been addressed.
214. A condition will be required on any grant of permission to ensure that future residents within the development (with the exception of blue badge holders) are excluded from eligibility for on-street parking permits.

### **Car club**

215. There are currently four car club locations close to the site. The applicant has agreed to fund either the provision on additional car club bay or an extension to an existing bay as well as fund three years car club membership for the first occupants of each residential unit. Car club obligations will be secured by legal

agreement.

### **Cycle parking**

216. The London Plan requires 469 residential cycle spaces, 30 commercial spaces and 20 short stay parking spaces for visitors. The cycle parking has been revised during the course of the application and the following provision is now proposed:

	Sheffield stands	Double stackers	Vertically mounted	Total	Policy requirement
Residential	26	180	267	473	469
Residential (visitor)	16	0	0	16	
Commercial	2	28	9	39	
Commercial (visitor)	22	0	0	22	
Total	66 (12%)	208 (38%)	276 (50%)	550	528

217. Overall, there would be 31 additional parking spaces beyond the London Plan requirements which is positive. The resident and commercial cycle parking would be provided in stores located across the site, including six of the railway arches, to ensure they are easily accessible to each of the blocks. 88% of the parking would be in the form of double stackers or vertically mounted racks with 12% provision of Sheffield stands for visitors. A higher proportion of Sheffield stands would be preferred to ensure the parking is accessible to all users but it is acknowledged that this type of storage is space intensive.
218. The revised Transport Assessment advises that shower and locker facilities will be provided as part of the commercial cycle parking offer in order to encourage employees to cycle to the site. The detailed design of the stores is not evident from the submitted layout drawings and therefore officers recommend a condition is imposed requiring detailed design of the commercial cycle stores.

### **Travel plan**

219. Revised Residential and Workplace Travel Plans have been submitted and are considered to be acceptable. TfL have requested that final travel plans, including monitoring post occupation, should be secured by legal agreement.

### **Refuse and servicing**

#### **Refuse**

220. Refuse collection would be undertaken from bin stores located throughout the blocks and railway arches. Individual residents and commercial occupiers would be responsible for transporting their waste to the bin stores for collection. Refuse would be collected primarily from within the site. On the western side of the development, refuse vehicles would collect from the courtyard (Blocks J-M and Pool House). On the eastern side, refuse vehicles would collect from the new Viaduct Route (Blocks A-F and Coroners Court) and Occupation Road (Block G – northern end). Refuse collection for the southern end of Block G would be undertaken direct from Penrose Street.

## **Deliveries**

221. Deliveries to the commercial units would be undertaken from the landscaped courtyard and Viaduct Route. A concierge facility would be available for residential deliveries that are too large to be put in a letter box. It is anticipated that the number of daily deliveries would be relatively small and would primarily be by small or transit type vans with limited need for larger goods vehicles. In terms of infrequent deliveries such as maintenance or removals, these trips would need to be arranged with the concierge to ensure access is provided to the appropriate area.
222. Officers and TfL are satisfied that the proposed delivery and servicing arrangements are acceptable subject to the final Delivery and Service Plan being secured by condition.

## **Archaeology**

223. Saved Policy 3.19 of the Southwark Plan requires an archaeological assessment to be submitted for applications affecting sites within Archaeological Priority Zones (APZs).
224. The Manor Place development site is partially located within the Walworth Village APZ and a desk-based assessment has been completed by the Museum of London Archaeology (MOLA). The proximity of the site to St John's Chapel, located to the south of the site, is noted as increasing the prospect of archaeological remains being preserved in the locality and the report acknowledges the site as being archaeologically sensitive. The council's archaeologist advises that it is highly likely that post-medieval burials will be present on-site and that such remains would be of significant archaeological interest.
225. In line with the findings of the report and the views of the council's archaeologist, it is recommended that a series of planning conditions are imposed to require further archaeological evaluation of the site, mitigation and archaeological recording. The foundation design should also allow for any archaeological remains to be preserved in situ.

## **Ground conditions and contamination**

226. A Phase 1 desk-based report has been prepared by AECOM setting out details of historic site investigation, geology and the likely presence of contamination. The report asserts that the historical land-uses of the site make it plausible that a range of contaminants will be present. The report acknowledges that limited site investigations were undertaken 2012 and that whilst traces of contaminants were discovered, the concentrations were not deemed to present any significant risks. However, the submitted AECOM report considers the risk of on-site contamination to range from low to moderate and recommends a more intrusive scheme of site investigation be undertaken prior to the commencement of development. A standard planning condition is proposed to address this.
227. Further, the desk-study acknowledges that the site was subject to heavy bomb damage during World War II and as such there is a high risk of unexploded bombs. It recommends that a specialist report is undertaken prior to development commencing to investigate more thoroughly the risk of unexploded ordnance and

the mitigation that will be undertaken to minimise any risk.

**228. Planning obligations (S.106 undertaking or agreement)**

229. Policy 8.2 of the London Plan advises that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Core Strategy 14 and Saved Policy 2.5 of the Southwark Plan state that planning obligations will be sought to reduce or mitigate the impacts of the development. These local policies are reinforced by the council's S106 Planning Obligations / Community Infrastructure Levy SPD.

**S106 contributions**

230. Following the adoption of Southwark CIL (SCIL) on 1 April 2015, much of the previous 'S106 toolkit' obligations such as education and strategic transport have been replaced by SCIL. With SCIL in place, S106 contributions will be used to address site specific impacts of the development such as public realm improvements. S106 obligations can be negotiated where items sought are clearly linked to the development site and are needed to make that particular development acceptable. The S106 / CIL SPD establishes that it is reasonable that S106 obligations may be sought to address site-specific impacts on a case-by-case basis. SCIL on the other hand will be used to fund local and strategic infrastructure required to support growth across the borough.

231. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations to be:

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

232. Only defined site specific mitigation that meets the Regulation 122 tests can be given weight. The site specific contributions set out below have been agreed.

Planning Obligation	Mitigation
Archaeology	£11,171 – to support Southwark's monitoring of archaeological matters
Child play – over 12 year age group	£16,610 – there is a shortfall of 110 sqm in over 12's play. Monies will be secure improving play provision elsewhere in the surrounding area
Wheelchair accessible housing	£400,000 – payment in lieu for shortfall in amount of wheelchair provision to contribute towards funding adaptations to existing housing
Employment during construction	Applicant to provide own construction training initiative scheme. A default payment (to be confirmed) will be secured in the event that the applicant fails to provide training scheme or in the event agreed job training targets are not met.
Employment in the development	£21,500 – towards a skills and employment plan for employment opportunities in the final

	development.
Transport site specific	Contribution towards provision of new / extended provision of car club bay in the vicinity.
Public realm	Payment in kind works - Applicant will be delivering improvements along Manor Place, Occupation Road and Penrose Street. Works will include, but not exclusively, widening of Occupation Road (including resurfacing carriageway), repaving footways and upgraded street lighting to development frontages. Works to be secured via S278 Agreement.
Administration charge (2%)	To be confirmed

233. In addition, the following contributions have been agreed with TfL which will be secured in the S106 legal agreement:

- £10,000 towards provision of a new bus shelter (Stop 'S') on Penrose Street
- £6,000 towards Legible London signage
- £50,000 towards provision of a new or enlarged cycle hire docking station(s) within a 600m catchment of the site.

234. The S106 will also include provisions for:

- 104 affordable housing units on-site
- Marking Strategy for the commercial units
- Marketing Strategy for the wheelchair adaptable units (i.e. market and intermediate wheelchair accessible units)
- Funding of 3 years free car club membership
- Travel Plans
- Demolition and Construction Environmental Management Plans.

235. The aforementioned S106 planning obligations are considered necessary to mitigate the impacts of the development, they are directly related to the development and are proportionate to its size and scale.

236. In the event that the legal agreement has not been signed by 30 November 2015, it is recommended that the Director of Planning be authorised to refuse planning permission, if appropriate, for the following reason:

*In the absence of a signed S106 legal agreement, there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and would therefore be contrary to Saved Policy 2.5 Planning Obligations of the Southwark Plan (2007), Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011), Policy 8.2 Planning Obligations of the London Plan (2015) and the Southwark Section 106 Planning Obligations Supplementary Planning Document (2015).*

#### **Mayoral and Southwark CIL**

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

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

### **Mayoral CIL**

238. The Mayor CIL (MCIL) came into effect on 1 April 2012. All new developments that create 100 sqm or more of additional floorspace are liable to pay the MCIL which is charged at £35 per sqm (indexed at £40.02 per sqm). Based on the total new proposed floorspace the Mayoral CIL would equate to **£571,827** (to be confirmed).

### **Southwark CIL**

239. The Southwark CIL rate is based on the type and location of the development. Within the Elephant and Castle, a levy of £200 per sqm is charged for residential development and £0 for offices. A charge of £125 per sqm is applicable to Class A1-A5 retail uses. At this stage, the end user(s) of the commercial space is unknown and hence at this stage a calculation for retail use has not been included. Based on the existing occupied floorspace (i.e. 33 Manor Place) and the proposed new floorspace, the SCIL is calculated to be **£3,969,100** (to be confirmed).

### **Sustainable development implications**

#### **Air quality**

240. London Plan policy 7.14 ‘Improving Air Quality’ states that development proposals should minimise exposure to poor air quality, being at least ‘air quality neutral’. This is particularly the case where developments are located within designated Air Quality Management Areas, as is the case with this proposal. Further, Southwark Plan policy 3.6 stipulates that planning permission will not be granted where a development would lead to a reduction in air quality.
241. RPS have completed an Air Quality Assessment that considers the potential air quality impacts during construction and on completion of the development. The residential nature of the development and the surrounding area makes it particularly sensitive and so receptors were chosen at various locations, and at various heights, within the site and surrounding streets to assess the potential impacts.
242. Dust is highlighted as the most important issue during construction and appropriate mitigation measures will need to be employed to reduce adverse impacts. Such measures should be detailed in a demolition and construction environmental management plan, the submission of which will be secured via the s106 agreement.
243. Once operational, the most important consideration is emissions linked to the gas-fired boilers in the on-site energy centre. Modelling indicates that the impacts are predicted to be ‘slight adverse’ or ‘negligible’. Nitrogen Dioxide concentrations are anticipated to be within the objective limits prescribed in legislation. It is proposed

that planning conditions will be imposed to require monitoring of emissions.

244. Subject to appropriate mitigation measures being implemented, including the installation of mechanical ventilation for all residential units, the assessment concludes that the effects on air quality will be 'not significant' and that the scheme is compliant with local, regional and national guidance.
245. In addition, an Air Quality Neutral calculation has been completed, following the methodology prescribed in the Mayor's Sustainable Design and Construction SPG (2014). The calculation considers whether a development will have an adverse impact on local air quality by comparing the anticipated emissions linked to the buildings and transport with benchmark values for each of the land-uses proposed.

## Energy

246. Core Strategy strategic policy 13: High environmental standards sets out that all development should meet the highest possible environmental standards. This includes reducing greenhouse gas emissions by applying the Mayor's energy hierarchy: be lean (building fabric efficiency), be clean (clean supply of energy), be green (incorporating renewable technologies). The London Plan requires that all major development achieves a 40% reduction in carbon dioxide emissions relative to Building Regulations 2010, however, the Mayor's Sustainable Design and Construction SPG 2014 confirms that this is broadly equivalent to a 35% reduction relative to the revised Building Regulations 2013.
247. The submitted energy assessment determines the target emission rate for a development that would be compliant with Part L of Building Regulations 2013, before modelling the carbon savings achieved at each stage of the energy hierarchy. For the new build residential element, the starting point is a notional new build residential unit, whilst for the refurbished commercial floorspace, the starting point is the existing building in its current state. This approach is consistent with the relevant Mayoral guidance.
248. The submitted energy strategy proposes a range of fabric efficiency measures and connection to a sitewide district heat network with combined heat and power (CHP) boilers. This system will utilise the existing Manor Place chimney and the boiler plant will be 'future proofed' such that it would allow for connection to a wider heating network if this were to be delivered in the vicinity of the site. The CHP network will serve all of the residential units as well as commercial space in the converted listed building. In addition, photovoltaic (PV) panels are proposed at roof level on the majority of the residential blocks.
249. The energy assessment indicates the following reductions in Regulated CO2 emissions (all measurements in Kg CO2):

	Residential	Carbon saving	Commercial	Carbon saving	Whole development	Carbon saving
Target emission rate	359,963		190,710		550,673	
Be lean	313,753	-46,210	67,275	-123,435	381,028	-169,645
Be clean	256,308	-103,655	57,330	-133,380	313,638	-237,035
Be green	232,810	-127,153	57,330	/	290,140	-260,533
Total saving		35.3%		69.9%		47.3%

250. The assessment demonstrates that a 35% saving in carbon emissions is

achievable for new build residential assessment, whilst a 70% saving can be achieved on the refurbished commercial space. As a whole, the development is modelled as achieving a 47% reduction in carbon dioxide emissions relative to Part L of Building Regulations 2013 and is, in this regard, consistent with the London Plan and Southwark Core Strategy.

251. PV panels alone are responsible for a 23,498Kg annual reduction in carbon emissions (6.5% of residential emissions or 4.3% overall), which though lower than the Core Strategy target is considered a reasonable reduction in the context of the overall savings achieved and the fact that a large proportion of the available roof space is being used for PV panels.

## **BREEAM**

252. Core Strategy policy 13 also states that all non-residential development should aim to achieve a BREEAM rating of 'Excellent'. A BREEAM Pre-Assessment has been prepared in the form of an investigative report that considers the scope for intervention, on a room-by-room basis, to improve the environmental performance of the Listed Building. The report concludes that whilst internal alterations are possible without jeopardising the significance of the listed building, there are limitations to what can be achieved. For example, whilst there are opportunities for secondary glazing and insulation in some of the ancillary spaces, there is less scope for work of this nature in the Former Pool and Wash House without compromising the heritage value of the space. In light of this, officers are satisfied that requiring a BREEAM rating of 'Very Good' will strike an appropriate balance between improving environmental performance and safeguarding the character and significance of the listed building.

## **Flood risk and drainage**

253. The Environment Agency's flood mapping identifies the site as being located predominantly in Flood Zone 3a, indicating a high probability of flooding. The NPPF technical guidance note identifies residential development as being a 'more vulnerable' use and states that the 'exception test' should be passed when such development is proposed in Flood Zone 3a. The two conditions of the exception test are that it is demonstrated that the development brings wider sustainability benefits that outweigh the flood risk and that a site specific Flood Risk Assessment (FRA) demonstrates that the site will be safe throughout the lifetime of the development and will not increase the flood risk elsewhere.
254. The submitted FRA considers the risk of flooding presented by the Thames, as a result of surface water, from sewers, from groundwater and as a result of proximity to local reservoirs, canals or ponds. It acknowledges that the site is protected by flood defences along the banks of the Thames, as well as by the Thames Barrier and that, given the distance of the site from the Thames, it is unlikely that a breach of these defences would affect the site. This is confirmed by the Environment Agency in their comments. The FRA states that the risk presented from other sources is also low and that the proposed development would not increase these risks. It is considered that the proposal is consistent with Core Strategy policy 13: High Environmental Standards and the relevant NPPF guidance.
255. The incorporation of additional areas of soft landscaping across three communal gardens, a series of private amenity space and via a number of green roofs will



contribute to required reductions of surface water runoff. The council's flood risk and drainage team have reviewed the FRA and Drainage Statement, both prepared by AECOM, and endorsed both documents. The approach to reducing runoff by 50% is considered appropriate in principle and officers recommend that a planning condition is introduced that requires further detail of sustainable drainage systems to demonstrate that the saving can be achieved.

### **Conclusion on planning issues**

256. The Manor Place Depot site has been identified as a development site to facilitate the wider regeneration of the Elephant and Castle. The site is within an Opportunity Area where high quality mixed use development is encouraged. The depot site is no longer required to be used as a waste site and the existing under-used buildings on site make a poor contribution to the local streetscape. As such, the principle of redevelopment of the site is strongly supported. The retention and re-use of the Grade II listed Manor Place Baths is of further benefit. The proposed land uses are highly appropriate in this location, including the activation of the railway arches with flexible town centre uses, and the new public realm and landscape enhancements would also benefit the wider area and provide an improved relationship between the site and the surrounding streets.
257. The proposal would deliver 270 new homes, including a level of affordable housing that well exceeds the minimum 35% policy requirement. As such, the development would make a significant contribution to Southwark's housing supply. The quality of the internal residential accommodation and outdoor amenity spaces is sufficiently high across all tenures and the units generally achieve a high rate of compliance with BRE daylight standards.
258. The height, scale and massing of the new build elements are acceptable. Revisions have been made to alleviate the unbroken massing of the Viaduct Block and officers are satisfied that a high quality scheme would be delivered, subject to detailed section drawings and material samples being secured by condition. In terms of works to the listed building, the proposal is sensitively designed with a clear respect for the appearance, style and age of the building. The proposed alterations would result in less than substantial harm to its heritage significance. Any harm would be outweighed by the public benefit of securing its viable reuse.
259. The impacts of the development on the amenities of neighbouring properties have been considered very carefully. No impacts have been identified that would warrant the refusal of planning permission. Revisions have been made to the transport strategy, including relocation of on-site disabled parking bays and the widening and of Occupation Road. The works to Occupation Road will adequately accommodate vehicular trips associated with the new development and improve access and servicing to existing properties on this route. In terms of sustainability, the proposal complies with the environmental standards set out in the London Plan and Southwark Core Strategy. Taking all matters into consideration, officers recommend that planning permission is granted for the proposed development and listed building consent is given for the refurbishment and works to the listed building.

### **Community impact statement**

260. In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to

local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. The impact on local people is set out above.

### **Statement of Community Involvement**

261. A Statement of Community Involvement has been submitted which details the public consultation and engagement process undertaken by the applicant prior to submission of the planning application. The public engagement included a series of exhibitions held in June, August, and November 2014 and February 2015.

### **Design Review Panel**

262. Various iterations of the proposal were presented to the Design Review Panel (DRP) in September and December 2014. A summary of the panel's comments are provided in the main body of the report.

### **Consultations**

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

### **Consultation replies**

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

### **Summary of consultation responses**

#### **Neighbours and local groups**

265. Representations to the scheme have been received from The Walworth Society, Elephant Amenity Network/35percent Campaign, and occupiers of properties on Occupation Road, Penton Place, and Walworth Road.
266. The following concerns have been raised as part of the consultation and re-consultation undertaken:

#### **Affordable housing**

Application is not open and transparent - Application Form states 44 units of 'Social Rented Housing' but the submitted documents make it clear there will be no social rented units.

Applicant doesn't address issues raised in the council's Clarifications Report (December 2011) about how rents will be kept affordable or why the proposed development is exceptional and should be allowed affordable rent.

No mention of whether a viability assessment required for the development to be treated as exceptional has been submitted or which of the three options [outlined in Clarifications Report] would be used to achieve either reduced levels of affordable rent or provide some social rented housing.

#### **Overdevelopment on eastern side of viaduct**

Densest of the housing is located on the narrowest eastern parts of the site with consequent under-provision of amenity space and play areas on this side.

Density of Viaduct Block would be much higher than that given for the site if it were taken in proportion to its own plot.

Overdevelopment of the eastern side creates a 'split-site' with unequal distribution of benefits either side of the railway.

### **Height and scale**

7 storey height and massing of Viaduct Block is excessive and overdominant in its lower scale surroundings.

Viaduct Block presents a monolithic structure with lack of breaks and vertical delineation.

More variation in height / actual physical break up / variation in depth required to Viaduct Block - modulations in height and depth would allow greater daylight and sunlight penetration for existing neighbours.

### **Architectural treatment and materials**

Cladding for 7<sup>th</sup> storey of Viaduct Block is too dark.

Predominance of red brick is overwhelming and risks diluting the status of the listed Baths Building and Former Coroner's Court.

Use of yellow stock brick would be more appropriate for the Viaduct Block and improve light / reflectance towards Occupation Road.

Use of pale grey balcony and window details would keep the tone of the street bright and light.

Angled projecting balconies on eastern Viaduct Block are incongruous and give unwelcome prominence to balconies in views along viaduct route.

Dark wooden cladding is out of context with local area.

Gateway buildings at end of Occupation Road / Penrose Street new route feel insubstantial.

### **Public access / circulation**

Lack of visual or physical penetration across the whole site.

Impenetrable division of the Viaduct Block renders the railway line even more of a barrier than the existing viaduct.

East-west movement is now concentrated through 3 adjacent arches which are visually blocked off from outside the site.

### **Daylight and Sunlight**

Height of Viaduct Block will overshadow and significantly impact on daylight and sunlight to artists' studios (including central amenity courtyard) on Occupation Road.

Potential sunlight impact to properties on Penton Place.

### **Parking and highway safety**

Proposal will increase demand on the very narrow existing Occupation Road which currently is barely useable for servicing existing properties.

Proposal fails to adequately take into account the narrow width of the southern part of Occupation Road.

Occupation Road should be widened to a sufficient width along its length.

Disproportionate amount of disabled parking located on narrow section of Occupation Road and should be relocated.

Proposal will affect the operations and safety of existing business users  
Car club bay should be provided on site.

### **Access**

Occupiers of Walworth Road properties wish to have a fire escape access to the back of their properties from the new development via an entrance in the boundary wall.

### **Memorial Stones**

Memorial Stones on Penrose Street façade should be preserved and prominently located within redeveloped site.

### **In support**

267. The Walworth Society, whilst raising concerns with the application (noted above), also support aspects of the proposal as follows:

Quality of the engagement with the applicant.

Retention of Former Coroner's Court

Restriction of vehicle movements through the site whilst maximising cycle / pedestrian movement and developer's support for the 'Low Line'.

Opening up of the arches for new businesses.

The benefits that almost 300 new households will bring to businesses on Walworth Road.

### **Internal services**

### **Local economy team**

268. Acknowledge the positive contribution that the new commercial floorspace would bring to the local economy. However, some concerns are raised about the absence of clear proposals for managing and operating the commercial space. A

marketing plan should be sought and secured by condition / obligations.

### **Elephant and Castle regeneration team**

269. Supports the redevelopment of the former depot. The scheme creates an opportunity to transform a key brownfield site. The proposed layout would give prominence to the listed building. The creation of a new north-south public route alongside the viaduct would deliver a section of the 'low-line' and increase the employment density of the business space within the arches. The project also enhances the permeability of the viaduct by opening up three arches to create a new public route through the site. The employment floorspace will create valuable new enterprise opportunities for local SME businesses and create additional employment. New housing, including high quality affordable housing, will help contribute towards meeting plan targets and will contribute to the viability and future success of Walworth Road. The project delivers new high quality public realm, meets the council's energy targets. CIL contributions would deliver key local infrastructure projects.

### **Highways team**

270. All footways should be minimum 1.8m in width and resurfaced with silver grey granite natural stone paving slabs and 300mm wide kerbs of similar material. The private access road off Penrose Street linking Occupation Road is to be controlled by a bollard. The applicant should provide information at the gateway entering the private road. The proposed servicing, mainly through the new private access road and the viaduct route is acceptable. A turning facility needs to be provided at the southern end of Occupation Road. A S278 Agreement will be required to complete: repaving footways around the site; construction of new vehicle accesses; upgrade street lighting; relocation of gulley on Penrose Street.

### **Flood and drainage team**

271. No objection, subject to a condition requiring use of SuDS and limiting surface water run-off.

### **Ecology officer**

272. No objections raised, subject to conditions to secure ecological enhancements, including management plan.

### **Environmental protection team**

273. No objections subject to conditions requiring further details on land contamination, noise, and air quality mitigation.

### **Archaeology officer**

274. No objections, subject to conditions requiring building recording on the listed building and archaeological evaluation.

### **Statutory and non-statutory organisations**

#### **Environment Agency**

275. No objection, subject to securing conditions requiring further details concerning site contamination and remediation, foundation design, and surface water drainage.

#### **London Underground**

276. No comments to make on the application.

#### **Metropolitan Police**

277. No objection, subject to condition requiring the development to achieve Secured by Design accreditation to prevent crime and criminality.

#### **Network Rail**

278. No objections. The application makes reference to the covenant that no building can be erected within 3m of the viaduct. Any use of the arches, once agreed, would need to include provision for Network Rail to inspect the arches.

#### **Historic England**

279. No comments to make on the planning application.
280. The application for Listed Building Consent should be determined as you think fit.

#### **Greater London Authority**

281. The application is broadly acceptable in strategic planning terms, on balance the application does not comply with the London Plan. The following changes are required:

#### **Principle of development**

Further information on groups or businesses who have demonstrated interest in taking up the business space within the listed building to ensure the works proposed are suitable for future occupiers.

#### **Urban design**

Concerned with the quality of the new pedestrian route alongside the viaduct and request further work on the layout and use of the ground floor units of Block A-F. The overall form of this block should be reviewed. The material palette should be reserved by condition.

#### **Sustainable development**

Revised overheating work should be produced which may include additional passive measures. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended. A drawing of the route of the site heat network should be provided. The drainage strategy should be secured by condition and the application should consider how landscaping could be designed to attenuate rainwater.

## **Transportation**

Access arrangements to the site should be rearranged to avoid the moving of bus stop 'S'. Cycle parking spaces should be increased in line with London Plan Standards. Applicant should consider increasing the number of on-street car club spaces and future occupiers should be given membership to car clubs. Servicing and construction plans should be secured by condition and future occupiers barred from applying for parking permits. The S106 agreement should include £10,000 towards a new bus shelter, £6,000 towards Legible London signage, £100,000 and a site for a new cycle hire docking station and the submission and monitoring of a travel plan.

## **Transport for London**

282. Are satisfied that there will be no adverse impacts upon the TLRN and SRN. Request that the walking and cycling connections through the site are publically accessible. The level of cycle parking doesn't comply with London Plan standards. Additional blue badge parking should be provided for commercial occupants. Future occupiers should be exempt from applying for parking permits.
283. Conditions / obligations recommended in respect of Delivery and Service Plan, Construction Logistics Plan, and Travel Plan. Request S106 financial contributions towards bus shelter improvements, Legible London signage, and installation of new cycle docking station.

## **Thames Water**

284. No objections subject to condition regarding impact piling.

## **London Fire and Emergency Planning Authority**

285. Premises are not due currently due for an inspection under the risk based re-inspection programme. It will be inspected in line with our programme at which time the fire risk will be assessed. No comments to make.

## **LAMAS – Historic Buildings & Conservation**

286. No real objections but consider that the building is excessively overpowering. Conversion of the listed and undesignated buildings is well considered and the overall scale of the new was not inappropriate. However, the mass of the new brickwork was overwhelming and the upper storeys should be 'lighter' architecturally.

## **Victorian Society**

287. Supportive of the principle of the sympathetic reuse of the listed building. However, the proposed architectural treatment of the former pool's exterior would be detrimental to the building's appearance and character. At the rear, it is intended to clad much of the elevations with timber which is an alien material and would provide an unhappy contrast with the robust and vivid Victorian brickwork to both the front and rear blocks. The manner in which the timber cladding is proposed to wrap round the south-western corner would be particularly harmful.

The material and architectural form of this new work would be detrimental to the character and appearance of the listed building.

### Human rights implications

288. 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.
289. These applications have the legitimate aim of providing a mixed use development and refurbishment and conversion of a Grade II listed building. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

### BACKGROUND DOCUMENTS

Background Papers	Held at	Contact
Site history file: TP/1171-B Application file: 15/AP/1062 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: <a href="mailto:Planning.enquiries@southwark.gov.uk">Planning.enquiries@southwark.gov.uk</a> Case officer telephone: 020 7525 5349 Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>



## APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Images
Appendix 4	Recommendations – to follow in addendum report

## AUDIT TRAIL

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Helen Goulden, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	15 September 2015	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	No	No
Strategic director, housing and community services	No	No
Director of regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		15 September 2015

# APPENDIX 1

## Consultation undertaken

**Site notice date:** 28/04/2015

**Press notice date:** 30/04/2015

**Case officer site visit date:** n/a

**Neighbour consultation letters sent:** 28/04/2015

### Internal services consulted:

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

### Statutory and non-statutory organisations consulted:

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

### Neighbour and local groups consulted:

28 Sutherland Square SE17 3EQ	Flat 9 George Elliot House SE17 3AQ
The Pullens Centre 184 Crampton Street SE17	Flat 11 George Elliot House SE17 3AQ
Via Email x	Flat 10 George Elliot House SE17 3AQ
Flat 64 Penrose House SE17 3DY	106 Penton Place London SE17 3JB
Flat 63 Penrose House SE17 3DY	Flat 7 140 Manor Place SE17 3BH
	Flat 5 140 Manor Place SE17 3BH
	Flat 8 140 Manor Place SE17 3BH
	Flat 11 140 Manor Place SE17 3BH
	Flat 10 140 Manor Place SE17 3BH

Flat 65 Penrose House SE17 3DY	First Floor Flat 33 Manor Place SE17 3BD
Flat 67 Penrose House SE17 3DY	Flat 30 Manor Place SE17 3BB
Flat 66 Penrose House SE17 3DY	Second Floor Flat 33 Manor Place SE17 3BD
Flat 59 Penrose House SE17 3DY	Flat 4 140 Manor Place SE17 3BH
Flat 58 Penrose House SE17 3DY	Flat 3 140 Manor Place SE17 3BH
Flat 60 Penrose House SE17 3DY	Flat 12 140 Manor Place SE17 3BH
Flat 62 Penrose House SE17 3DY	Flat 21 140 Manor Place SE17 3BH
Flat 61 Penrose House SE17 3DY	Flat 20 140 Manor Place SE17 3BH
Flat 68 Penrose House SE17 3DY	Flat 22 140 Manor Place SE17 3BH
Flat 75 Penrose House SE17 3DY	Flat 27 140 Manor Place SE17 3BH
Flat 74 Penrose House SE17 3DY	Flat 25 140 Manor Place SE17 3BH
Flat 76 Penrose House SE17 3DY	Flat 14 140 Manor Place SE17 3BH
Flat 78 Penrose House SE17 3DY	Flat 13 140 Manor Place SE17 3BH
Flat 77 Penrose House SE17 3DY	Flat 17 140 Manor Place SE17 3BH
Flat 70 Penrose House SE17 3DY	Flat 19 140 Manor Place SE17 3BH
Flat 69 Penrose House SE17 3DY	Flat 18 140 Manor Place SE17 3BH
Flat 71 Penrose House SE17 3DY	Flat 5 East Street SE17 2DJ
Flat 73 Penrose House SE17 3DY	Unit C Ground Floor 237 Walworth Road SE17 1RL
Flat 72 Penrose House SE17 3DY	Unit D 237 Walworth Road SE17 1RL
Flat 57 Penrose House SE17 3DY	Second Floor 227 Walworth Road SE17 1RL
Flat 42 Penrose House SE17 3DY	Flat 2 204 Walworth Road SE17 1JE
Flat 41 Penrose House SE17 3DY	Flat 1 204 Walworth Road SE17 1JE
Flat 43 Penrose House SE17 3DY	Flat 3 239 Walworth Road SE17 1RL
Flat 45 Penrose House SE17 3DY	Flat 2 239 Walworth Road SE17 1RL
Flat 44 Penrose House SE17 3DY	Rios De Vida Church Unit A 237 Walworth Road SE17 1RL
Flat 37 Penrose House SE17 3DY	Unit C First Floor 237 Walworth Road SE17 1RL
Flat 36 Penrose House SE17 3DX	Unit B 237 Walworth Road SE17 1RL
Flat 38 Penrose House SE17 3DY	Flat 3 204 Walworth Road SE17 1JE
Flat 40 Penrose House SE17 3DY	248c Walworth Road London SE17 1JE
Flat 39 Penrose House SE17 3DY	Room 117 140 Manor Place SE17 3BH
Flat 46 Penrose House SE17 3DY	Living Accommodation Good Intent Public House SE17 2DN
Flat 53 Penrose House SE17 3DY	Living Accommodation 267 Walworth Road SE17 1RL
Flat 52 Penrose House SE17 3DY	Flat 5 204 Walworth Road SE17 1JE
Flat 54 Penrose House SE17 3DY	Flat 4 204 Walworth Road SE17 1JE
Flat 56 Penrose House SE17 3DY	Flat 6 204 Walworth Road SE17 1JE
Flat 55 Penrose House SE17 3DY	Flat 8 204 Walworth Road SE17 1JE
Flat 48 Penrose House SE17 3DY	Flat 7 204 Walworth Road SE17 1JE
Flat 47 Penrose House SE17 3DY	Flat 29 140 Manor Place SE17 3BH
Flat 49 Penrose House SE17 3DY	Unit 2 Martara Mews SE17 3DG
Flat 51 Penrose House SE17 3DY	Unit 1 Martara Mews SE17 3DG
Flat 50 Penrose House SE17 3DY	Unit 3 Martara Mews SE17 3DG
Flat 79 Penrose House SE17 3DY	Unit 5 Martara Mews SE17 3DG
16 Gates Court Marsland Close SE17 3JN	Unit 4 Martara Mews SE17 3DG
1 Gates Court Marsland Close SE17 3JN	5-9 Amelia Street London SE17 3PY
2 Gates Court Marsland Close SE17 3JN	First Floor 3-9 Amelia Street SE17 3PY
21 Gates Court Marsland Close SE17 3JN	Middle Unit First Floor SE17 3PY
20 Gates Court Marsland Close SE17	Unit 8 Martara Mews SE17 3DG

3JN	6 Williamson Court Borrett Close SE17	Right Hand Unit First Floor SE17 3PY
3JE	5 Williamson Court Borrett Close SE17	Unit 6 Martara Mews SE17 3DG
3JE	7 Williamson Court Borrett Close SE17	Flat B 257 Walworth Road SE17 1RL
3JE	9 Williamson Court Borrett Close SE17	Flat A 257 Walworth Road SE17 1RL
3JE	8 Williamson Court Borrett Close SE17	Flat A 295 Walworth Road SE17 2TG
3JE	22 Gates Court Marsland Close SE17	Flat 4 Ground Floor Rear 257 Walworth Road SE17
3JN	7 Gates Court Marsland Close SE17	1RL
3JN	6 Gates Court Marsland Close SE17	Flat B 295 Walworth Road SE17 2TG
3JN	8 Gates Court Marsland Close SE17	Unit 9 Martara Mews SE17 3DG
3JN	8 Gates Court Marsland Close SE17	Unit 7 Martara Mews SE17 3DG
3JN	89a Penton Place London SE17 3JR	Unit10 Martara Mews SE17 3DG
3JN	9 Gates Court Marsland Close SE17	Unit 12 Martara Mews SE17 3DG
3JN	24 Gates Court Marsland Close SE17	Unit 11 Martara Mews SE17 3DG
3JN	23 Gates Court Marsland Close SE17	Ground Floor 3 Amelia Street SE17 3PY
3JN	3 Gates Court Marsland Close SE17	Flat 2 252 Walworth Road SE17 1JE
3JN	5 Gates Court Marsland Close SE17	Flat 1 252 Walworth Road SE17 1JE
3JN	4 Gates Court Marsland Close SE17	Part Third Floor North And Part Fourth Floor North
3JN	4 Williamson Court Borrett Close SE17	224-236 Walworth Road SE17 1JE
3JE	10 Williamson Court Borrett Close SE17	Flat 1 286 Walworth Road SE17 2TE
3JE	10 Williamson Court Borrett Close SE17	284 Walworth Road London SE17 2TE
3JE	1 Williamson Court Borrett Close SE17	Flat 33 140 Manor Place SE17 3BH
3JE	11 Williamson Court Borrett Close SE17	Flat 31 140 Manor Place SE17 3BH
3JE	13 Williamson Court Borrett Close SE17	22 Martara Mews London SE17 3EG
3JE	12 Williamson Court Borrett Close SE17	24 Martara Mews London SE17 3EG
3JE	Flat 81 Penrose House SE17 3DY	23 Martara Mews London SE17 3EG
	Flat 80 Penrose House SE17 3DY	Flat 2 286 Walworth Road SE17 2TE
	Flat 82 Penrose House SE17 3DY	25 Martara Mews London SE17 3EG
	Flat 84 Penrose House SE17 3DY	Store C 1 Martara Mews SE17 3DG
	Flat 83 Penrose House SE17 3DY	Flat 1 301 Walworth Road SE17 2TG
	14 Williamson Court Borrett Close SE17	Flat 3 301 Walworth Road SE17 2TG
3JE	20 Williamson Court Borrett Close SE17	Flat 2 301 Walworth Road SE17 2TG
3JE	2 Williamson Court Borrett Close SE17	First Floor 186 Walworth Road SE17 1JJ

3JE  
21 Williamson Court Borrett Close SE17 Flat 3 286 Walworth Road SE17 2TE  
3JE  
3 Williamson Court Borrett Close SE17 Second Floor 186 Walworth Road SE17 1JJ  
3JE  
22 Williamson Court Borrett Close SE17 Store B 1 Martara Mews SE17 3DG  
3JE  
16 Williamson Court Borrett Close SE17 Workshop A 1 Martara Mews SE17 3DG  
3JE  
15 Williamson Court Borrett Close SE17 14 Martara Mews London SE17 3EG  
3JE  
17 Williamson Court Borrett Close SE17 13 Martara Mews London SE17 3DG  
3JE  
19 Williamson Court Borrett Close SE17 15 Martara Mews London SE17 3EG  
3JE  
18 Williamson Court Borrett Close SE17 17 Martara Mews London SE17 3EG  
3JE  
121 Manor Place London SE17 3JP 16 Martara Mews London SE17 3EG  
119 Manor Place London SE17 3JP 9 Martara Mews SE17 3DG  
123 Manor Place London SE17 3JP 8 Martara Mews London SE17 3EG  
127 Manor Place London SE17 3JP 10 Martara Mews SE17 3DG  
125 Manor Place London SE17 3JP 12 Martara Mews SE17 3DG  
111 Manor Place London SE17 3JP 11 Martara Mews SE17 3DG  
109 Manor Place London SE17 3JP 18 Martara Mews London SE17 3EG  
113 Manor Place London SE17 3JP Flat 2 Duke Of Clarence Court SE17 3BG  
117 Manor Place London SE17 3JP 259b Walworth Road London SE17 1RL  
115 Manor Place London SE17 3JP Flat 12 Duke Of Clarence Court SE17 3BG  
101 Penton Place London SE17 3JR Flat 10 Duke Of Clarence Court SE17 3BG  
24 Marsland Close London SE17 3JW Flat 11 Duke Of Clarence Court SE17 3BG  
22 Marsland Close London SE17 3JW 20 Martara Mews London SE17 3EG  
26 Marsland Close London SE17 3JW 19 Martara Mews SE17 3DG  
30 Marsland Close London SE17 3JW 21 Martara Mews London SE17 3EG  
28 Marsland Close London SE17 3JW Second Floor Flat 238 Walworth Road SE17 1JE  
80 Penton Place London SE17 3JS 259a Walworth Road London SE17 1RL  
103 Penton Place London SE17 3JR 7 Martara Mews London SE17 3EG  
82 Penton Place London SE17 3JS Flat 24 140 Manor Place SE17 3BH  
84 Penton Place London SE17 3JS Flat 23 140 Manor Place SE17 3BH  
9 Borrett Close London SE17 3JF Flat 26 140 Manor Place SE17 3BH  
120 Penton Place London SE17 3JB Flat 30 140 Manor Place SE17 3BH  
118 Penton Place London SE17 3JB Flat 28 140 Manor Place SE17 3BH  
122 Penton Place London SE17 3JB Flat 1 140 Manor Place SE17 3BH  
10 Borrett Close London SE17 3JF 18 East Street London SE17 2DN  
1 Borrett Close London SE17 3JF Flat 15 140 Manor Place SE17 3BH  
110 Penton Place London SE17 3JB Flat 2 140 Manor Place SE17 3BH  
108 Penton Place London SE17 3JB Flat 16 140 Manor Place SE17 3BH  
112 Penton Place London SE17 3JB Flat 32 140 Manor Place SE17 3BH  
116 Penton Place London SE17 3JB 3 Martara Mews London SE17 3EG  
114 Penton Place London SE17 3JB 2 Martara Mews London SE17 3EG  
11 Borrett Close London SE17 3JF 4 Martara Mews London SE17 3EG  
5 Borrett Close London SE17 3JF 6 Martara Mews London SE17 3EG  
4 Borrett Close London SE17 3JF 5 Martara Mews London SE17 3EG  
6 Borrett Close London SE17 3JF Flat 9 140 Manor Place SE17 3BH  
8 Borrett Close London SE17 3JF Flat 6 140 Manor Place SE17 3BH  
7 Borrett Close London SE17 3JF 11 Walworth Place London SE17 2TQ

15 Borrett Close London SE17 3JF  
13 Borrett Close London SE17 3JF  
17 Borrett Close London SE17 3JF  
3 Borrett Close London SE17 3JF  
2 Borrett Close London SE17 3JF  
32 Marsland Close London SE17 3JW  
36a Penrose Street London SE17 3DW  
50b Penrose Street London SE17 3DW  
58b Penrose Street London SE17 3DW  
58a Penrose Street London SE17 3DW  
Flat 9 Penrose House SE17 3DU  
Flat 8 Penrose House SE17 3DU  
Flat 1 52 Penrose Street SE17 3DW  
Flat 3 52 Penrose Street SE17 3DW

Flat 2 52 Penrose Street SE17 3DW  
Flat 25 Penrose House SE17 3DX  
Flat 32 Penrose House SE17 3DX  
Flat 31 Penrose House SE17 3DX  
Flat 33 Penrose House SE17 3DX  
Flat 35 Penrose House SE17 3DX  
Flat 34 Penrose House SE17 3DX  
Flat 27 Penrose House SE17 3DX  
Flat 26 Penrose House SE17 3DX  
Flat 28 Penrose House SE17 3DX  
Flat 30 Penrose House SE17 3DX  
Flat 29 Penrose House SE17 3DX  
Flat 7 Penrose House SE17 3DU  
8 Pasley Close London SE17 3JY  
6 Pasley Close London SE17 3JY  
1 Amelia Street London SE17 3PY  
4 Berryfield Road London SE17 3QE  
10 Berryfield Road London SE17 3QE  
10 Pasley Close London SE17 3JY  
34 Marsland Close London SE17 3JW  
12 Pasley Close London SE17 3JY  
4 Pasley Close London SE17 3JY  
2 Pasley Close London SE17 3JY  
6 Berryfield Road London SE17 3QE

Flat 3 Penrose House SE17 3DU  
Flat 2 Penrose House SE17 3DU  
Flat 4 Penrose House SE17 3DU  
Flat 6 Penrose House SE17 3DU  
Flat 5 Penrose House SE17 3DU  
Flat 1 Penrose House SE17 3DU  
8 Berryfield Road London SE17 3QE  
Flat 10 Penrose House SE17 3DU  
Flat 12 Penrose House SE17 3DU  
Flat 11 Penrose House SE17 3DU  
89b Penton Place London SE17 3JR  
Flat 2 91 Penton Place SE17 3JR  
Flat 1 277-279 Walworth Road SE17 2TG

1 Martara Mews London SE17 3EG  
248a Walworth Road London SE17 1JE  
Flat 9 Duke Of Clarence Court SE17 3BG  
Flat A 245 Walworth Road SE17 1RL  
8 East Street London SE17 2DN  
Flat B 245 Walworth Road SE17 1RL  
10 Laugan Walk London SE17 2EA  
9 Laugan Walk London SE17 2EA  
First Floor Flat 241 Walworth Road SE17 1RL  
Room 2 Surrey Gardens Memorial Hall SE17 3DW  
31 Amelia Street London SE17 3PY  
6 East Street London SE17 2DN  
4 East Street London SE17 2DN  
Basement And Ground Floors 214 Walworth Road SE17 1JE  
Flat B 255 Walworth Road SE17 1RL  
Flat A 255 Walworth Road SE17 1RL  
Flat C 255 Walworth Road SE17 1RL  
Flat 1 239 Walworth Road SE17 1RL  
Flat 1 233 Walworth Road SE17 1RL  
Flat 2 Pearlec House SE17 2DL  
Flat 1 Pearlec House SE17 2DL  
Flat 3 Pearlec House SE17 2DL  
Flat 5 Pearlec House SE17 2DL  
Flat 4 Pearlec House SE17 2DL  
Part Ground Floor 238 Walworth Road SE17 1JE  
Flat 5 Duke Of Clarence Court SE17 3BG  
Flat 3 Duke Of Clarence Court SE17 3BG  
243b Walworth Road London SE17 1RL  
Railway Arch 210 Penrose Grove SE17 3EZ  
Flat 7 Duke Of Clarence Court SE17 3BG  
Flat 8 Duke Of Clarence Court SE17 3BG  
Flat 4 Duke Of Clarence Court SE17 3BG  
Flat 6 Duke Of Clarence Court SE17 3BG  
Flat 1 Duke Of Clarence Court SE17 3BG  
7 Laugan Walk London SE17 2EA  
6 Laugan Walk London SE17 2EA  
8 Laugan Walk London SE17 2EA  
Part Ground Floor And First Floor Rear Of 263-265 Walworth Road SE17 1RL  
Rear Of 238 Walworth Road SE17 1JE  
2 Laugan Walk London SE17 2EA  
1 Laugan Walk London SE17 2EA  
3 Laugan Walk London SE17 2EA  
5 Laugan Walk London SE17 2EA  
4 Laugan Walk London SE17 2EA  
Flat 3 Third Floor 257 Walworth Road SE17 1RL  
Flat 17 Manchester House SE17 2DW  
Flat 16 Manchester House SE17 2DW  
Flat 18 Manchester House SE17 2DW  
Flat 2 Manchester House SE17 2DW  
Flat 19 Manchester House SE17 2DW  
Flat 12 Manchester House SE17 2DW

Flat 2 95 Penton Place SE17 3JR	Flat 11 Manchester House SE17 2DW
Flat 2 277-279 Walworth Road SE17 2TG	Flat 13 Manchester House SE17 2DW
Flat 2 99 Penton Place SE17 3JR	Flat 15 Manchester House SE17 2DW
Flat 213 Walworth Road SE17 1RL	Flat 14 Manchester House SE17 2DW
First Floor Flat 280 Walworth Road SE17 2TE	Flat 20 Manchester House SE17 2DW
Flat 1 91 Penton Place SE17 3JR	Flat 4 Manchester House SE17 2DW
Flat 1 99 Penton Place SE17 3JR	Flat 3 Manchester House SE17 2DW
Flat 1 95 Penton Place SE17 3JR	Flat 5 Manchester House SE17 2DW
Flat 3 91 Penton Place SE17 3JR	Flat 7 Manchester House SE17 2DW
First Floor And Second Floor Flat 210 Walworth Road SE17 1JE	Flat 6 Manchester House SE17 2DW
First Floor And Second Floor Flat 209 Walworth Road SE17 1RL	Flat 22 Manchester House SE17 2DW
Fourth Floor Flat 258-260 Walworth Road SE17 1JE	Flat 21 Manchester House SE17 2DW
Ground Floor Flat 86 Penton Place SE17 3JS	Flat 23 Manchester House SE17 2DW
Ground Floor First Floor And Second Floor Flat 221 Walworth Road SE17 1RL	Flat 25 Manchester House SE17 2DW
Flat 3 99 Penton Place SE17 3JR	Flat 24 Manchester House SE17 2DW
Flat 3 95 Penton Place SE17 3JR	Flat 10 Manchester House SE17 2DW
Flat 3 277-279 Walworth Road SE17 2TG	28 East Street London SE17 2DN
Flat B 38a Penrose Street SE17 3ED	20 East Street London SE17 2DN
Flat A 38a Penrose Street SE17 3ED	262 Walworth Road London SE17 2TE
93b Penton Place London SE17 3JR	278 Walworth Road London SE17 2TE
Good Intent Public House 24-26 East Street SE17 2DN	7 East Street London SE17 2DJ
9b Manor Place London SE17 3BD	5 East Street London SE17 2DJ
217a Walworth Road London SE17 1RL	14 East Street London SE17 2DN
212a Walworth Road London SE17 1JE	2 East Street London SE17 2DN
217b Walworth Road London SE17 1JE	16 East Street London SE17 2DN
Railway Arch 182 30 Manor Place SE17 3BB	282 Walworth Road London SE17 2TE
33 Manor Place London SE17 3BD	1a East Street London SE17 2DJ
97 Penton Place London SE17 3JR	299 Walworth Road London SE17 2TG
9a Manor Place London SE17 3BD	1b East Street London SE17 2DJ
50a Penrose Street London SE17 3DW	Flat 1 Manchester House SE17 2DW
262a Walworth Road London SE17 2TE	1c East Street London SE17 2DJ
Top Floor Flat 86 Penton Place SE17 3JS	283 Walworth Road London SE17 2TG
First Floor And Second Floor Flat 214 Walworth Road SE17 1JE	288 Walworth Road London SE17 2TE
Second Floor Flat 257 Walworth Road SE17 1RL	287 Walworth Road London SE17 2TG
Top Flat 7 Manor Place SE17 3BD	295 Walworth Road London SE17 2TG
First Floor Flat 2 Manor Place SE17 3BB	293 Walworth Road London SE17 2TG
25b Manor Place London SE17 3BD	Flat 8 Manchester House SE17 2DW
25a Manor Place London SE17 3BD	40 Penrose Street London SE17 3DW
Above 287 Walworth Road SE17 2TG	39 Penrose Street London SE17 3DW

First Floor And Second Floor Flat 203 Walworth Road SE17 1RL	41 Penrose Street London SE17 3DW
Basement And Ground Floor Flat 7 Manor Place SE17 3BD	44 Penrose Street London SE17 3DW
Flat 1 93 Penton Place SE17 3JR	42 Penrose Street London SE17 3DW
Second Floor And Third Floor 225 Walworth Road SE17 1RL	1 Occupation Road London SE17 3BE
Front And Part Rear First Floor 225 Walworth Road SE17 1RL	31 Penrose Street London SE17 3DW
Ground Floor Rear 227 Walworth Road SE17 1RL	37 Penrose Street London SE17 3DW
Office Part First Floor 227 Walworth Road SE17 1RL	35 Penrose Street London SE17 3DW
Office No 4 Part First Floor 227 Walworth Road SE17 1RL	45 Penrose Street London SE17 3DW
Part Third Floor South 224-236 Walworth Road SE17 1JE	64 Penrose Street London SE17 3DW
Second Floor 224-236 Walworth Road SE17 1JE	62 Penrose Street London SE17 3DW
Part Fourth Floor South 224-236 Walworth Road SE17 1JE	100 Penton Place London SE17 3JB
Ground Floor 225 Walworth Road SE17 1RL	104 Penton Place London SE17 3JB
Part Basement 225 Walworth Road SE17 1RL	102 Penton Place London SE17 3JB
Shop 227 Walworth Road SE17 1RL	48 Penrose Street London SE17 3DW
Part Ground Floor 263-265 Walworth Road SE17 1RL	46 Penrose Street London SE17 3DW
Rear Of 262 Walworth Road SE17 2TE	54 Penrose Street London SE17 3DW
Basement And Ground Floor 277-279 Walworth Road SE17 2TG	60 Penrose Street London SE17 3DW
First Floor And Second Floor 285 Walworth Road SE17 2TG	56 Penrose Street London SE17 3DW
Ground Floor 280 Walworth Road SE17 2TE	5 Manor Place London SE17 3BD
Rear Of 245 Walworth Road SE17 1RL	289-291 Walworth Road London SE17 2TG
Rear Of 243 Walworth Road SE17 1RL	285 Walworth Road London SE17 2TG
256-260 Walworth Road London SE17 1JF	297 Walworth Road London SE17 2TG
Rear Of 257 Walworth Road SE17 1RL	264-276 Walworth Road London SE17 2TE
Basement And Part Ground Floor 257 Walworth Road SE17 1RL	22 East Street London SE17 2DN
Part First Floor South 224-236 Walworth Road SE17 1JE	14 Bronti Close London SE17 2HD
210-211 Carter Place London SE17 2TF	Flat 9 Manchester House SE17 2DW
9a Amelia Street London SE17 3PY	16 Bronti Close London SE17 2HD
Ground Floor 3 East Street SE17 2DJ	28 Bronti Close London SE17 2HD
Railway Arch 184 30 Manor Place SE17 3BL	24 Bronti Close London SE17 2HD
1d East Street London SE17 2DJ	281 Walworth Road London SE17 2TG
Flat 223 Walworth Road SE17 1RL	17 Manor Place London SE17 3BD
Flat 219 Walworth Road SE17 1RL	13 Manor Place London SE17 3BD
Flat 215 Walworth Road SE17 1RL	19 Manor Place London SE17 3BD
Third Floor Flat 258-260 Walworth Road	3 Manor Place London SE17 3BD



SE17 1JE	Second Floor Flat 241 Walworth Road	21 Manor Place London SE17 3BD
SE17 1RL	Railway Arch 185 30 Manor Place SE17	290 Walworth Road London SE17 2TE
3BL		
Railway Arch 207 Penrose Street SE17	301 Walworth Road London SE17 2TG	
3DW		
Railway Arch 205 Penrose Street SE17	Railway Arch 183 30 Manor Place SE17 3BB	
3EZ		
Railway Arches 208 To 209 Penrose	11 Manor Place London SE17 3BD	
Street SE17 3EZ		
Part First Floor 224-236 Walworth Road	Kennington And Walworth Delivery Centre 111-123	
SE17 1JE	Crampton Street SE17 3AA	
Club Room Penrose House SE17 3DU	3 York Mansions Browning Street SE17 1LP	
Rear Of 37 Penrose Street SE17 3DW	2 York Mansions Browning Street SE17 1LP	
Rear Of 1 Occupation Road SE17 3BE	4 York Mansions Browning Street SE17 1LP	
Railway Arch 203 Penrose Street SE17	6 York Mansions Browning Street SE17 1LP	
3EZ		
Railway Arch 206 Penrose Street SE17	5 York Mansions Browning Street SE17 1LP	
3DW		
Railway Arch 204 Penrose Street SE17	First Floor And Second Floor Flat 216 Walworth Road	
3EZ	SE17 1JE	
81 Penton Place London SE17 3JR	194 Walworth Road London SE17 1JJ	
79 Penton Place London SE17 3JR	First Floor Flat 238 Walworth Road SE17 1JE	
83 Penton Place London SE17 3JR	1 York Mansions Browning Street SE17 1LP	
Surrey Gardens Memorial Hall Penrose	260a Walworth Road London SE17 1JE	
Street SE17 3DW		
85 Penton Place London SE17 3JR	7 York Mansions Browning Street SE17 1LP	
71 Penton Place London SE17 3JR	Flat 2 220-222 Walworth Road SE17 1JE	
152 Manor Place London SE17 3BH	Flat 1 220-222 Walworth Road SE17 1JE	
73 Penton Place London SE17 3JR	182-184 Walworth Road London SE17 1JJ	
77 Penton Place London SE17 3JR	224-236 Walworth Road London SE17 1JE	
75 Penton Place London SE17 3JR	196-202 Walworth Road London SE17 1JJ	
67 Penton Place London SE17 3JR	9 York Mansions Browning Street SE17 1LP	
6 Thrush Street London SE17 3AQ	8 York Mansions Browning Street SE17 1LP	
5 Thrush Street London SE17 3AQ	243a Walworth Road London SE17 1RL	
7 Thrush Street London SE17 3AQ	247b Walworth Road London SE17 1RL	
9 Thrush Street London SE17 3AQ	247a Walworth Road London SE17 1RL	
8 Thrush Street London SE17 3AQ	190 Walworth Road London SE17 1JJ	
1 Thrush Street London SE17 3AQ	Flat B 246 Walworth Road SE17 1JE	
69 Penton Place London SE17 3JR	Flat A 246 Walworth Road SE17 1JE	
2 Thrush Street London SE17 3AQ	Flat C 246 Walworth Road SE17 1JE	
4 Thrush Street London SE17 3AQ	259 Walworth Road London SE17 1RZ	
3 Thrush Street London SE17 3AQ	234-236 Walworth Road London SE17 1JD	
150 Manor Place London SE17 3BH	1a York Mansions Browning Street SE17 1LP	
2 Runacres Court Pasley Close SE17	203 Walworth Road London SE17 1RL	
3JZ		
11 Runacres Court Pasley Close SE17	Flat B 240 Walworth Road SE17 1JE	
3JZ		
23 Runacres Court Pasley Close SE17	Flat A 240 Walworth Road SE17 1JE	
3JZ		
4 Runacres Court Pasley Close SE17	232 Walworth Road London SE17 1JE	
3JZ		
3 Runacres Court Pasley Close SE17	226-228 Walworth Road London SE17 1JE	

3JZ	
Flat 2 93 Penton Place SE17 3JR	238 Walworth Road London SE17 1JE
89c Penton Place London SE17 3JR	242 Walworth Road London SE17 1JE
Flat 3 93 Penton Place SE17 3JR	240 Walworth Road London SE17 1JE
10 Runacres Court Pasley Close SE17 3JZ	210 Walworth Road London SE17 1JE
1 Runacres Court Pasley Close SE17 3JZ	208 Walworth Road London SE17 1JE
5 Runacres Court Pasley Close SE17 3JZ	212 Walworth Road London SE17 1JE
142 Manor Place London SE17 3BH	218 Walworth Road London SE17 1JE
36-38 Penrose Street London SE17 3DW	201 Walworth Road London SE17 1RL
144 Manor Place London SE17 3BH	223 Walworth Road London SE17 1RL
148 Manor Place London SE17 3BH	219 Walworth Road London SE17 1RL
146 Manor Place London SE17 3BH	229 Walworth Road London SE17 1RL
7 Runacres Court Pasley Close SE17 3JZ	243 Walworth Road London SE17 1RL
6 Runacres Court Pasley Close SE17 3JZ	235 Walworth Road London SE17 1RL
8 Runacres Court Pasley Close SE17 3JZ	247-249 Walworth Road London SE17 1RL
Security House 2-6 Occupation Road SE17 3BE	199 Walworth Road London SE17 1RL
9 Runacres Court Pasley Close SE17 3JZ	244-248 Walworth Road London SE17 1JE
10 Thrush Street London SE17 3AQ	215 Walworth Road London SE17 1RL
Flat 12 Lynford French House SE17 3AQ	209 Walworth Road London SE17 1RL
Flat 11 Lynford French House SE17 3AQ	255 Walworth Road London SE17 1RL
188 Crampton Street London SE17 3AE	Flat 3 251-253 Walworth Road SE17 1RL
140 Manor Place London SE17 3BH	Flat 2 251-253 Walworth Road SE17 1RL
2 Manor Place London SE17 3BB	248b Walworth Road London SE17 1JE
Flat 7 Lynford French House SE17 3AQ	3 East Street London SE17 2DJ
Flat 6 Lynford French House SE17 3AQ	217 Walworth Road London SE17 1RL
Flat 8 Lynford French House SE17 3AQ	275 Walworth Road London SE17 1RL
Flat 10 Lynford French House SE17 3AQ	273 Walworth Road London SE17 1RL
Flat 9 Lynford French House SE17 3AQ	269-271 Walworth Road London SE17 1RL
Penrose Surgery 33 Penrose Street SE17 3DW	Flat 1 251-253 Walworth Road SE17 1RL
29a Amelia Street London SE17 3PY	267 Walworth Road London SE17 1RL
Walworth Police Station 12-28 Manor Place SE17 3BB	10 York Mansions Browning Street SE17 1LP
164 Manor Place London SE17 3BL	250 Walworth Road London SE17 1JE
168 Manor Place London SE17 3BL	216 Walworth Road London SE17 1JE
166 Manor Place London SE17 3BL	207 Walworth Road London SE17 1RL
43 Penrose Street London SE17 3DW	213 Walworth Road London SE17 1RL
Manor Place Surgery 1 Manor Place SE17 3BD	188 Walworth Road London SE17 1JJ
7- 10 Occupation Road London SE17 3BE	230 Walworth Road London SE17 1JE
30 Manor Place London SE17 3BB	221 Walworth Road London SE17 1RL

25 Manor Place London SE17 3BD	233 Walworth Road London SE17 1RL
Flat 5 Lynford French House SE17 3AQ	205 Walworth Road London SE17 1RL
Flat 2 George Elliot House SE17 3AQ	245 Walworth Road London SE17 1RL
Flat 1 George Elliot House SE17 3AQ	186 Walworth Road London SE17 1JJ
Flat 3 George Elliot House SE17 3AQ	252 Walworth Road London SE17 1JE
Flat 5 George Elliot House SE17 3AQ	211 Walworth Road London SE17 1RL
Flat 4 George Elliot House SE17 3AQ	1a Browning Street London SE17 1LN
12 Thrush Street London SE17 3AQ	239 Walworth Road London SE17 1RL
11 Thrush Street London SE17 3AQ	231 Walworth Road London SE17 1RL
13 Thrush Street London SE17 3AQ	192 Walworth Road London SE17 1JJ
15 Thrush Street London SE17 3AQ	251 Walworth Road London SE17 1RL
14 Thrush Street London SE17 3AQ	220-222 Walworth Road London SE17 1JE
Flat 6 George Elliot House SE17 3AQ	241 Walworth Road London SE17 1RL
Flat 1 Lynford French House SE17 3AQ	91b Penton Place First Floor Flat SE17 3JR
Flat 12 George Elliot House SE17 3AQ	6 Well Street London E9 7PX
Flat 2 Lynford French House SE17 3AQ	By Email
Flat 4 Lynford French House SE17 3AQ	Upper Woodside Woodside Lane GU34 3EX
Flat 3 Lynford French House SE17 3AQ	244 Walworth Road London SE17 1JE
Flat 8 George Elliot House SE17 3AQ	28 Sutherland Square SE17 3EQ
Flat 7 George Elliot House SE17 3AQ	18 Market Place Blue Anchor Lane SE16 3UQ

**Re-consultation:** 24/06/2015

## APPENDIX 2

### Consultation responses received

#### Internal services

Flood and Drainage Team

#### Statutory and non-statutory organisations

Council for British Archaeology

Environment Agency

Historic England

London Fire & Emergency Planning Authority

London Underground Limited

Network Rail (Planning)

Thames Water - Development Planning

The Victorian Society

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

#### Neighbours and local groups

Email representation

Email representation

Flat 2 91 Penton Place SE17 3JR

Upper Woodside Woodside Lane GU34 3EX

18 Market Place Blue Anchor Lane SE16 3UQ

224-236 Walworth Road London SE17 1JE

226-228 Walworth Road London SE17 1JE

230 Walworth Road London SE17 1JE

238 Walworth Road London SE17 1JE

242 Walworth Road London SE17 1JE

244 Walworth Road London SE17 1JE

28 Sutherland Square SE17 3EQ

28 Sutherland Square SE17 3EQ

28 Sutherland Square SE17 3EQ

6 Well Street London E9 7PX

7- 10 Occupation Road London SE17 3BE

7- 10 Occupation Road London SE17 3BE

7- 10 Occupation Road London SE17 3BE

7- 10 Occupation Road London SE17 3BE

7- 10 Occupation Road London SE17 3BE

7- 10 Occupation Road London SE17 3BE

7- 10 Occupation Road London SE17 3BE

7- 10 Occupation Road London SE17 3BE

7- 10 Occupation Road London SE17 3BE

91b Penton Place First Floor Flat SE17 3JR