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

#### **RECOMMENDATION**

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

#### **BACKGROUND INFORMATION**

## Site location and description

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

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

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

## Planning policy designations (Adopted Policies Map)

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

#### **Details of Proposal**

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

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

#### **Planning History**

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

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

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

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

- 17. Applications for the approval of reserved matters (access, scale, appearance, layout and landscaping) for the following Development Plots:
  - 14/AP/3439 **H2** The proposals comprise the construction of a development plot ranging between 10 and 31 storeys in height (max height 104.8m AOD) comprising 365 residential units, 2,033sqm (GEA) flexible retail (A1-A5) uses, car parking, cycle storage, servicing, plant areas, landscaping, new public realm and other associated works.
  - 14/AP/3438 **H3** The proposals comprise the construction of a development plot ranging between 5 and 19 storeys in height (max height 67.5m AOD), comprising 228 residential units, 2,370sqm (GEA) of flexible retail (A1-A5) uses, cycle storage, servicing, plant areas, new landscaping, new public realm and other associated works
  - 13/AP/3584 **H10** The proposals comprise the construction of a development plot ranging between 3 and 10 storeys in height (maximum building height 37.23m AOD), comprising 69 residential units, car parking, motorcycle parking, cycle storage, servicing, plant areas, new landscaping, and other associated works.
  - 13/AP/3583 **H13** The proposals comprise the construction of a development plot ranging between 3 and 7 storeys in height (maximum building height 26.68m AOD), comprising 67 residential units, cycle storage, plant areas, new landscaping, and other associated works.
  - 13/AP/3582 **MP1 Public Realm** The proposals comprise the construction of a development plot ranging between 3 and 7 storeys in height (maximum building height 26.68m AOD), comprising 67 residential units, cycle storage, plant areas, new landscaping, and other associated works.
  - 13/AP/3581 **H6** The proposals comprise the construction of a development plot ranging between 3 and 16 storeys in height (maximum building height 55.23m AOD), comprising 224 residential units, 695 sqm (GEA) of flexible retail (Classes A1-A4), business (Class B1), non-residential institution (Class D1), and leisure (Class D2) uses, car parking, motorcycle parking, cycle storage, servicing, plant areas, new landscaping, and other associated work
- 18. 15/AP/1284 Application type: Screening Opinion (EIA) (SCR)
  Screening Opinion in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) in relation to the Reserved Matters Applications (RMA) for the 'Energy Centre' (Phase MP1a) of Elephant Park, submitted pursuant to the outline planning permission for the redevelopment of the Heygate Estate (ref: 12/AP/1092, Granted 27/03/2013).

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

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

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

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

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

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

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

## Relevant planning history of adjacent and nearby sites

22. <u>Trafalgar Place: Land bounded by Victory Place to the north, Balfour Street to the east, and Rodney Road to the south and west</u>

12-AP-2797

Permission granted on 15 March 2013 for: Construction of 8 buildings between 4 and 10 storeys in height (maximum building height 38.5m AOD), comprising 235 residential units, 204 sqm (GEA) of retail use (Class A1-A3), car parking beneath podium level, cycle storage, servicing, plant areas, landscaping and public realm improvements.

## Relevant planning policies

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

Policy 5.14 - Water Quality and Wastewater Infrastructure

Policy 5.15 - Water Use and Supplies

Policy 6.9 – Cycling

Policy 6.10 – Walking

Policy 6.13 - Parking

Policy 7.1 - Building London's Neighbourhoods and Communities

Policy 7.2 - An Inclusive Environment

Policy 7.3 - Designing out Crime

Policy 7.4 - Local Character

Policy 7.5 - Public Realm

Policy 7.6 – Architecture

Policy 7.7 - Location and Design of Tall Buildings

Policy 7.8 - Heritage Assets and Archaeology

Policy 7.14 – Improving Air Quality

Policy 7.19 – Biodiversity and Access to Nature

Policy 7.21 – Trees and Woodland

## 28. <u>Core Strategy (2011)</u>

Strategic Policy 1 – Sustainable development

Strategic Policy 2 – Sustainable transport

Strategic Policy 3 – Shopping, leisure and entertainment

Strategic Policy 10 – Jobs and businesses

Strategic Policy 11 - Open spaces and wildlife

Strategic Policy 12 – Design and conservation

Strategic Policy 13 – High environmental standards

Strategic Policy 14 – Implementation and delivery

#### 29. Southwark Plan 2007 – saved policies

Policy 1.1 - Access to employment opportunities

Policy 1.7 - Development within town and local centres

Policy 2.2 - Provision of new community facilities

Policy 3.1 - Environmental effects

Policy 3.2 - Protection of amenity

Policy 3.3 - Sustainability assessment

Policy 3.4 - Energy efficiency

Policy 3.6 - Air quality

Policy 3.7 - Waste reduction

Policy 3.9 - Water

Policy 3.11 - Efficient use of land

Policy 3.12 - Quality in design

Policy 3.13 - Urban design

Policy 3.14 - Designing out crime

Policy 3.15 - Conservation of the historic environment

Policy 3.18 - Setting of listed buildings, conservation areas and world heritage sites

Policy 3.22 - Important local views

Policy 3.28 – Biodiversity

Policy 5.2 - Transport impacts

Policy 5.3 - Walking and cycling

Policy 5.6 - Car parking

## 30. Supplementary Planning Documents (SPDs)

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

## Principle of development and land use considerations

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

## Compliance with the Outline Planning Permission

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

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

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

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

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

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

#### **Environmental impacts**

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

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

## Daylight and sunlight analysis

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

#### Daylight analysis

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

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

## Impact on neighbours outside Elephant Park

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

## Plot H10

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

#### Plot H13

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

#### Trafalgar Place – Block R1A

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

## Plot H11b

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

## **Sunlight analysis**

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

#### Overlooking and privacy

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

## <u>Noise</u>

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

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

#### Design

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

#### Height, bulk and massing

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

overshadowing analysis.

## Facades: materials and fenestration

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

#### Internal configuration

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

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

#### **Design Review Panel**

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

#### Public realm

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

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

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

# Trees and landscaping

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

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

## **Transport and highways**

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

## **Pedestrian and Cycle Network**

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

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

## Cycle parking

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

# Servicing

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

#### **Construction Management**

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

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

## **Sustainability**

## **Energy**

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

106. The breakdown is as follows:

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

- 107. This level of carbon reduction surpasses the 40% requirement established in the Outline Planning Permission and is supported by officers.
- 108. As stated at the outline planning stage and in the approved site wide energy strategy, the ambition is that biomethane gas will eventually be used in conjunction with the energy hub as an alternative to conventional gas. This biomethane would be injected into the gas network, effectively displacing the same amount of conventional gas. The use of biomethane would dramatically improve the level of carbon reduction across Elephant Park, however, at this point, it has not been demonstrated that this is a technical feasible solution. This will continue to be monitored and the site wide energy strategy updated, if necessary.
- 109. The s106 agreement sets out that the Energy Centre will not become operational until triggers are reached linked to sufficient thermal demand or a minimum number of units are occupied, whichever is earliest. These triggers were revised in planning approval 14/AP/3412 to be the occupation of 823 units or 3kW of thermal demand. Based on the current phasing plan, the first of the CHP boilers should be operational by Q2 2017. A temporary containerised solution is proposed in the interim to provide power for initial occupiers in Plots H6, H10, H13 and H3. This is subject to approval under planning application 15/AP/2512.

## **BREEAM**

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

#### Wind

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

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

## **Air Quality**

- 113. The site is located within the borough's Air Quality Management Area (AQMA). Air quality at Elephant and Castle is known to be particularly poor, with vehicular traffic acknowledged as the principal source of air borne pollutants. European and National legislation establish a series of standards and objectives for improving air quality, which represent the levels at which pollutant concentrations are thought to avoid or minimise risks to health. This includes objectives for concentrations of nitrogen dioxide and nitrous oxide (NO<sub>X</sub>) and particulate matter (PM<sub>10</sub>). Guidance in the NPPF sets out that planning decisions should contribute to sustaining compliance with these aims.
- 114. London Plan policy 7.14 states that development proposals should make provisions to address local problems of air quality through promoting sustainable design, minimising dust and emissions arising through demolition and construction and by promoting sustainable transport modes. It states that development should be at least Air Quality Neutral, with regard to the guidance in the Mayor's Sustainable Design and Construction SPD. Core Strategy policy 13: High Environmental Standards and saved Southwark Plan policy 3.6 Air quality set out a clear presumption against granting planning permission for development that would lead to a reduction in air quality.
- 115. The environmental statement underpinning the outline planning permission for Elephant Park identified emissions from the Energy Centre as being one of three sources that would have a potential impact on air quality, alongside dust and particulate matter (PM<sub>10</sub>) associated with demolition and construction and vehicular traffic.
- 116. Of most relevance to the energy centre application is the level of nitrogen dioxide (no2), varying concentrations of which are produced during the combustion of natural gas. The UK Air Quality Strategy establishes objective levels for nitrogen dioxide of 200µg over 1hr mean, not to be exceeded more than 18 times a year, and of 40µg annual mean.
- 117. A comprehensive air quality assessment has been undertaken by Parsons Brinckerhoff, having regard to these objective levels as well as best practice guidance issued by the Institute of Air Quality Management (IAQM) and DEFRA, as well as the GLA.

#### Modelling

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

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

#### Air Quality Neutral

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

## Conclusion

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

#### Flood risk and drainage

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

submitted pursuant to the necessary planning conditions in due course.

## **Planning Obligations**

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

#### Other matters

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

## **Conclusion on planning issues**

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

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

## **Community impact statement**

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

#### **Consultations**

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

## **Consultation replies**

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

#### **Neighbours**

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

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

#### **Statutory organisations**

## 144. Transport for London

No specific comments on the basis that the strategic transport impacts are likely to be limited.

#### 145. Thames Water

The reserved matters application does not affect Thames Water and as such we have no observations to make.

## 146. Environment Agency

No comments, subject to adherence with conditions on the outline planning permission in relation to flood risk (condition 8), piling design (condition 24), surface water drainage (condition 28), infiltration (condition 29) and contamination (conditions 30, 31 and 32)

## 147. London Fire and Emergency Planning Authority (LFEPA)

No objections

#### **Internal services**

#### 148. Public Realm

Support in principle, subject to finalising the detailed design of public realm areas through the discharge of planning conditions and via separate highways approval processes.

#### 149. Environmental Protection Team

Detailed comments provided on the Air Quality Assessment, including several requests for further information from the applicant's air quality consultant. Whilst the admission of a moderate adverse impact at the façade of H10 under the 'worst case scenario' is a concern, officers acknowledge that this is predicated on a long-term ambition to connect the energy centre to a much larger number of homes and that modelling is both comprehensive and conservative.

## 150. Design and conservation

Comments incorporated into the above report, including comments from the Design Review Panel.

#### 151. Urban Forester

Commends the landscaping concept design and proposed planting regime for Brandon Place. It is noted that further details on tree protection measures, final hard and soft landscaping plans and green roof specifications will be submitted pursuant to the relevant conditions on the OPP.

# 152. Ecology

A number of conditions recommended. Further detail will be required pursuant to

existing conditions on the OPP.

153. Flood risk and drainage
No comments at this stage

## **Human rights implications**

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

#### **BACKGROUND DOCUMENTS**

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

#### **APPENDICES**

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

# **AUDIT TRAIL**

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

## **APPENDIX 1**

#### Consultation undertaken

Site notice date: 20/07/2015

Press notice date: 23/07/2015

Case officer site visit date: n/a

Neighbour consultation letters sent: 23/07/2015

#### Internal services consulted:

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

#### Statutory and non-statutory organisations consulted:

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

#### Neighbour and local groups consulted:

The Archduke Charles Rodney Road SE17 1BA 504 Blackwood Apartments Victory Place SE17 1AQ 42a Wansey Street London SE17 1JP 501 Blackwood Apartments Victory Place SE17 1AQ 42b Wansey Street London SE17 1JP 502 Blackwood Apartments Victory Place SE17 1AQ Flat 1 5 Elba Place SE17 1PT 503 Blackwood Apartments Victory Place SE17 1AQ 702 Blackwood Apartments Victory Place SE17 1AQ 56a Larcom Street London SE17 1NQ 703 Blackwood Apartments Victory Place SE17 1AQ 58 Larcom Street London SE17 1NQ 60a Larcom Street London SE17 1NQ 1 Victory Place London SE17 1PG 701 Blackwood Apartments Victory Place SE17 1AQ 56b Wansey Street London SE17 1JP 58a Wansey Street London SE17 1JP 603 Blackwood Apartments Victory Place SE17 1AQ 58b Wansey Street London SE17 1JP 604 Blackwood Apartments Victory Place SE17 1AQ 56a Wansey Street London SE17 1JP 605 Blackwood Apartments Victory Place SE17 1AQ 405 Blackwood Apartments Victory Place SE17 1AQ 44 Wansey Street London SE17 1JP 54a Wansey Street London SE17 1JP 205 Blackwood Apartments Victory Place SE17 1AQ 301 Blackwood Apartments Victory Place SE17 1AQ 54b Wansey Street London SE17 1JP 54 Larcom Street London SE17 1NQ 302 Blackwood Apartments Victory Place SE17 1AQ 63a Larcom Street London SE17 1NJ 204 Blackwood Apartments Victory Place SE17 1AQ

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65a Larcom Street London SE17 1NJ
                                                                    201 Blackwood Apartments Victory Place SE17 1AQ
67a Larcom Street London SE17 1NJ
                                                                    202 Blackwood Apartments Victory Place SE17 1AQ
61a Larcom Street London SE17 1NJ
                                                                    203 Blackwood Apartments Victory Place SE17 1AQ
27a Charleston Street London SE17 1NG
                                                                    402 Blackwood Apartments Victory Place SE17 1AQ
                                                                    403 Blackwood Apartments Victory Place SE17 1AQ
45a Larcom Street London SE17 1NJ
47a Larcom Street London SE17 1NJ
                                                                    404 Blackwood Apartments Victory Place SE17 1AQ
42a Larcom Street London SE17 1NQ
                                                                    401 Blackwood Apartments Victory Place SE17 1AQ
                                                                    303 Blackwood Apartments Victory Place SE17 1AQ
46a Larcom Street London SE17 1NQ
                                                                    304 Blackwood Apartments Victory Place SE17 1AQ
52 Larcom Street London SE17 1NQ
40a Larcom Street London SE17 1NQ
                                                                    305 Blackwood Apartments Victory Place SE17 1AQ
                                                                    3 Victory Place London SE17 1PG
69a Larcom Street London SE17 1NJ
                                                                    403 Capell Apartments Victory Place SE17 1PG
81 Larcom Street London SE17 1NJ
38a Larcom Street London SE17 1NQ
                                                                    404 Capell Apartments Victory Place SE17 1PG
                                                                    501 Capell Apartments Victory Place SE17 1PG
60a Wansey Street London SE17 1JP
42 Walters Close Brandon Street SE17 1NE
                                                                    402 Capell Apartments Victory Place SE17 1PG
                                                                    305 Capell Apartments Victory Place SE17 1PG
43 Walters Close Brandon Street SE17 1NE
                                                                    306 Capell Apartments Victory Place SE17 1PG
Flat A 53 Larcom Street SE17 1NJ
40 Walters Close Brandon Street SE17 1NE
                                                                    401 Capell Apartments Victory Place SE17 1PG
37 Walters Close Brandon Street SE17 1NE
                                                                    101 Mansfield Point Rodney Road SE17 1BA
38 Walters Close Brandon Street SE17 1NE
                                                                    102 Mansfield Point Rodney Road SE17 1BA
                                                                    103 Mansfield Point Rodney Road SE17 1BA
39 Walters Close Brandon Street SE17 1NE
Flat B 59 Larcom Street SE17 1NJ
                                                                    53 Rodney Road London SE17 1BA
Flat A 71 Larcom Street SE17 1NJ
                                                                    502 Capell Apartments Victory Place SE17 1PG
Flat B 71 Larcom Street SE17 1NJ
                                                                    503 Capell Apartments Victory Place SE17 1PG
Flat A 59 Larcom Street SE17 1NJ
                                                                    504 Capell Apartments Victory Place SE17 1PG
Flat B 53 Larcom Street SE17 1NJ
                                                                    304 Capell Apartments Victory Place SE17 1PG
Flat A 55 Larcom Street SE17 1NJ
                                                                    13 Victory Place London SE17 1PG
Flat B 55 Larcom Street SE17 1NJ
                                                                    201 Capell Apartments Victory Place SE17 1PG
36 Walters Close Brandon Street SE17 1NE
                                                                    202 Capell Apartments Victory Place SE17 1PG
25 Walters Close Brandon Street SE17 1NE
                                                                    11 Victory Place London SE17 1PG
26 Walters Close Brandon Street SE17 1NE
                                                                    5 Victory Place London SE17 1PG
27 Walters Close Brandon Street SE17 1NE
                                                                    7 Victory Place London SE17 1PG
24 Walters Close Brandon Street SE17 1NE
                                                                    9 Victory Place London SE17 1PG
60b Wansey Street London SE17 1JP
                                                                    301 Capell Apartments Victory Place SE17 1PG
                                                                    302 Capell Apartments Victory Place SE17 1PG
22 Walters Close Brandon Street SE17 1NE
                                                                    303 Capell Apartments Victory Place SE17 1PG
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                                                                    206 Capell Apartments Victory Place SE17 1PG
34 Walters Close Brandon Street SE17 1NE
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                                                                    204 Capell Apartments Victory Place SE17 1PG
35 Walters Close Brandon Street SE17 1NE
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31 Walters Close Brandon Street SE17 1NE
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                                                                    First Floor And Second Floor Flat 23 Charleston Street SE17 1NG
29 Walters Close Brandon Street SE17 1NE
                                                                    Ground Floor Flat 29 Charleston Street SE17 1NG
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5 Tyler Court New Paragon Walk SE17 1AX
                                                                    Ground Floor Flat 23 Charleston Street SE17 1NG
6 Tyler Court New Paragon Walk SE17 1AX
                                                                    Flat 10 46b Brandon Street SE17 1NL
101 Tyler Court New Paragon Walk SE17 1AX
                                                                    Ground Floor Flat 21 Charleston Street SE17 1NG
4 Tyler Court New Paragon Walk SE17 1AX
                                                                    First Floor And Second Floor Flat 21 Charleston Street SE17 1NG
1 Tyler Court New Paragon Walk SE17 1AX
                                                                    Ground Floor Flat 39 Charleston Street SE17 1NG
2 Tyler Court New Paragon Walk SE17 1AX
                                                                    First Floor And Second Floor Flat 39 Charleston Street SE17 1NG
3 Tyler Court New Paragon Walk SE17 1AX
                                                                    Ground Floor Flat 41 Charleston Street SE17 1NG
106 Tyler Court New Paragon Walk SE17 1AX
                                                                    First Floor And Second Floor Flat 37 Charleston Street SE17 1NG
201 Tyler Court New Paragon Walk SE17 1AX
                                                                    Ground Floor Flat 35 Charleston Street SE17 1NG
202 Tyler Court New Paragon Walk SE17 1AX
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105 Tyler Court New Paragon Walk SE17 1AX
                                                                    Ground Floor Flat 37 Charleston Street SE17 1NG
102 Tyler Court New Paragon Walk SE17 1AX
                                                                    Flat 9 46b Brandon Street SE17 1NL
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104 Tyler Court New Paragon Walk SE17 1AX
                                                                    Flat 1 75d Larcom Street SE17 1NJ
905 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 1 46b Brandon Street SE17 1NL
705 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 3 75d Larcom Street SE17 1NJ
801 Rutherford Heights Rodney Road SE17 1AS
                                                                    Top Flat 58 Larcom Street SE17 1NQ
802 Rutherford Heights Rodney Road SE17 1AS
                                                                    Part First Floor And Second Floor Flat 48 Brandon Street SE17 1NL
704 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 2 75d Larcom Street SE17 1NJ
701 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 6 46b Brandon Street SE17 1NL
702 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 7 46b Brandon Street SE17 1NL
703 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 8 46b Brandon Street SE17 1NL
902 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 5 46b Brandon Street SE17 1NL
903 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 2 46b Brandon Street SE17 1NL
904 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 3 46b Brandon Street SE17 1NL
901 Rutherford Heights Rodney Road SE17 1AS
                                                                    Flat 4 46b Brandon Street SE17 1NL
803 Rutherford Heights Rodney Road SE17 1AS
                                                                    First Floor And Second Floor Flat 41 Charleston Street SE17 1NG
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804 Rutherford Heights Rodney Road SE17 1AS
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805 Rutherford Heights Rodney Road SE17 1AS
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                                                                    Flat 16 60 Brandon Street SE17 1AJ
403 Tyler Court New Paragon Walk SE17 1AX
                                                                    Flat 13 60 Brandon Street SE17 1AJ
404 Tyler Court New Paragon Walk SE17 1AX
                                                                    Flat 10 60 Brandon Street SE17 1AJ
405 Tyler Court New Paragon Walk SE17 1AX
                                                                    Flat 11 60 Brandon Street SE17 1AJ
402 Tyler Court New Paragon Walk SE17 1AX
                                                                    Flat 12 60 Brandon Street SE17 1AJ
309 Tyler Court New Paragon Walk SE17 1AX
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                                                                    23 Victory Place London SE17 1PG
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                                                                    15 Victory Place London SE17 1PG
406 Tyler Court New Paragon Walk SE17 1AX
                                                                    Flat 9 60 Brandon Street SE17 1AJ
46a Wansey Street London SE17 1JP
                                                                    47a Charleston Street London SE17 1NG
48 Wansey Street London SE17 1JP
                                                                    47b Charleston Street London SE17 1NG
308 Tyler Court New Paragon Walk SE17 1AX
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204 Tyler Court New Paragon Walk SE17 1AX
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                                                                    Flat 8 60 Brandon Street SE17 1AJ
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306 Tyler Court New Paragon Walk SE17 1AX
                                                                    Flat 2 60 Brandon Street SE17 1AJ
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                                                                    Flat 3 60 Brandon Street SE17 1AJ
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                                                                    Flat 4 60 Brandon Street SE17 1AJ
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303 Tyler Court New Paragon Walk SE17 1AX
                                                                    2 Rutherford Heights Rodney Road SE17 1AS
Flat A 73 Larcom Street SE17 1NJ
                                                                    3 Rutherford Heights Rodney Road SE17 1AS
Flat 7 29 Rodney Place SE17 1PP
                                                                    406 Morris Court Rodney Road SE17 1AW
Flat 8 29 Rodney Place SE17 1PP
                                                                    403 Morris Court Rodney Road SE17 1AW
Flat 9 29 Rodney Place SE17 1PP
                                                                    404 Morris Court Rodney Road SE17 1AW
Flat 6 29 Rodney Place SE17 1PP
                                                                    405 Morris Court Rodney Road SE17 1AW
Flat 3 29 Rodney Place SE17 1PP
                                                                    104 Rutherford Heights Rodney Road SE17 1AS
Flat 4 29 Rodney Place SE17 1PP
                                                                    105 Rutherford Heights Rodney Road SE17 1AS
Flat 5 29 Rodney Place SE17 1PP
                                                                    106 Rutherford Heights Rodney Road SE17 1AS
Flat 4 10 Munton Road SE17 1PR
                                                                    103 Rutherford Heights Rodney Road SE17 1AS
Flat 5 10 Munton Road SE17 1PR
                                                                    4 Rutherford Heights Rodney Road SE17 1AS
Flat 6 10 Munton Road SE17 1PR
                                                                    101 Rutherford Heights Rodney Road SE17 1AS
Flat 3 10 Munton Road SE17 1PR
                                                                    102 Rutherford Heights Rodney Road SE17 1AS
Flat 10 29 Rodney Place SE17 1PP
                                                                    402 Morris Court Rodney Road SE17 1AW
Flat 1 10 Munton Road SE17 1PR
                                                                    204 Morris Court Rodney Road SE17 1AW
Flat 2 10 Munton Road SE17 1PR
                                                                    205 Morris Court Rodney Road SE17 1AW
Flat 2 29 Rodney Place SE17 1PP
                                                                    206 Morris Court Rodney Road SE17 1AW
                                                                   203 Morris Court Rodney Road SE17 1AW
5 Morris Court Rodney Road SE17 1AW
Flat 2 5 Elba Place SE17 1PT
Flat 3 5 Elba Place SE17 1PT
Flat 4 5 Elba Place SE17 1PT
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56b Larcom Street London SE17 1NQ
50b Larcom Street London SE17 1NQ
                                                                    305 Morris Court Rodney Road SE17 1AW
                                                                    306 Morris Court Rodney Road SE17 1AW
42b Larcom Street London SE17 1NQ
48b Larcom Street London SE17 1NQ
                                                                    401 Morris Court Rodney Road SE17 1AW
                                                                    304 Morris Court Rodney Road SE17 1AW
68b Wansey Street London SE17 1JP
27b Charleston Street London SE17 1NG
                                                                    301 Morris Court Rodney Road SE17 1AW
Flat 1 29 Rodney Place SE17 1PP
                                                                    302 Morris Court Rodney Road SE17 1AW
46b Wansey Street London SE17 1JP
                                                                    303 Morris Court Rodney Road SE17 1AW
Flat 5 5 Elba Place SE17 1PT
                                                                    201 Rutherford Heights Rodney Road SE17 1AS
Flat 6 5 Elba Place SE17 1PT
                                                                    503 Rutherford Heights Rodney Road SE17 1AS
Flat 7 5 Elba Place SE17 1PT
                                                                    504 Rutherford Heights Rodney Road SE17 1AS
25 Charleston Street London SE17 1NG
                                                                    505 Rutherford Heights Rodney Road SE17 1AS
Flat A 49 Larcom Street SE17 1NJ
                                                                    502 Rutherford Heights Rodney Road SE17 1AS
Ground Floor Flat 57 Larcom Street SE17 1NJ
                                                                    405 Rutherford Heights Rodney Road SE17 1AS
Flat 1 66 Wansey Street SE17 1JP
                                                                    406 Rutherford Heights Rodney Road SE17 1AS
Flat A 44 Larcom Street SE17 1NQ
                                                                    501 Rutherford Heights Rodney Road SE17 1AS
Ground Floor And First Floor Flat 48 Brandon Street SE17 1NL
                                                                    604 Rutherford Heights Rodney Road SE17 1AS
Ground Floor Flat 44a Brandon Street SE17 1NL
                                                                    605 Rutherford Heights Rodney Road SE17 1AS
Ground Floor Flat 50 Brandon Street SE17 1NL
                                                                    606 Rutherford Heights Rodney Road SE17 1AS
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Second Floor Flat 4 Victory Place SE17 1PG 603 Rutherford Heights Rodney Road SE17 1AS 25 Brandon Street London SE17 1NE 506 Rutherford Heights Rodney Road SE17 1AS St Johns Institute Larcom Street SE17 1NQ 601 Rutherford Heights Rodney Road SE17 1AS Flat 3 66 Wansey Street SE17 1JP 602 Rutherford Heights Rodney Road SE17 1AS 404 Rutherford Heights Rodney Road SE17 1AS Ground Floor Flat 4 Victory Place SE17 1PG Ground Floor Flat 1-2 Munton Road SE17 1PR 206 Rutherford Heights Rodney Road SE17 1AS 301 Rutherford Heights Rodney Road SE17 1AS Flat B 79 Larcom Street SE17 1NJ Flat A 79 Larcom Street SE17 1NJ 302 Rutherford Heights Rodney Road SE17 1AS Victory Primary School Elba Place SE17 1PT 205 Rutherford Heights Rodney Road SE17 1AS First Floor And Second Floor Flat 44a Brandon Street SE17 1NL 202 Rutherford Heights Rodney Road SE17 1AS First Floor Flat 50 Brandon Street SE17 1NL 203 Rutherford Heights Rodney Road SE17 1AS 204 Rutherford Heights Rodney Road SE17 1AS 77 Larcom Street London SE17 1NJ 44a Wansey Street London SE17 1JP 401 Rutherford Heights Rodney Road SE17 1AS 51 Larcom Street London SE17 1NJ 402 Rutherford Heights Rodney Road SE17 1AS 403 Rutherford Heights Rodney Road SE17 1AS 62 Larcom Street London SE17 1NQ First Floor Flat 4 Victory Place SE17 1PG 306 Rutherford Heights Rodney Road SE17 1AS 303 Rutherford Heights Rodney Road SE17 1AS First Floor Flat 1-2 Munton Road SE17 1PR 304 Rutherford Heights Rodney Road SE17 1AS 305 Rutherford Heights Rodney Road SE17 1AS First Floor And Second Floor Flat 52 Brandon Street SE17 1NP Flat 2 66 Wansey Street SE17 1JP Flat B 44 Larcom Street SE17 1NQ 501 Mansfield Point Rodney Road SE17 1BA 502 Mansfield Point Rodney Road SE17 1BA Flat B 49 Larcom Street SE17 1NJ 503 Mansfield Point Rodney Road SE17 1BA 405 Mansfield Point Rodney Road SE17 1BA First Floor And Second Floor Flat 57 Larcom Street SE17 1NJ Block F Flat 3 Peabody Estate SE17 1BL Block F Flat 4 Peabody Estate SE17 1BL 402 Mansfield Point Rodney Road SE17 1BA Block F Flat 5 Peabody Estate SE17 1BL 403 Mansfield Point Rodney Road SE17 1BA Block F Flat 2 Peabody Estate SE17 1BL 404 Mansfield Point Rodney Road SE17 1BA Block D Flat 8 Peabody Estate SE17 1BJ 603 Mansfield Point Rodney Road SE17 1BA Block D Flat 9 Peabody Estate SE17 1BJ 604 Mansfield Point Rodney Road SE17 1BA Block D Flat 10 Peabody Estate SE17 1BJ 605 Mansfield Point Rodney Road SE17 1BA Block F Flat 10 Peabody Estate SE17 1BL 602 Mansfield Point Rodney Road SE17 1BA Block E Flat 2 Peabody Estate SE17 1BT 504 Mansfield Point Rodney Road SE17 1BA Block E Flat 3 Peabody Estate SE17 1BT 505 Mansfield Point Rodney Road SE17 1BA Block F Flat 9 Peabody Estate SE17 1BL 601 Mansfield Point Rodney Road SE17 1BA Block F Flat 6 Peabody Estate SE17 1BL 401 Mansfield Point Rodney Road SE17 1BA Block F Flat 7 Peabody Estate SE17 1BL 203 Mansfield Point Rodney Road SE17 1BA 204 Mansfield Point Rodney Road SE17 1BA Block F Flat 8 Peabody Estate SE17 1BL Block D Flat 7 Peabody Estate SE17 1BJ 205 Mansfield Point Rodney Road SE17 1BA 202 Mansfield Point Rodney Road SE17 1BA 50a Larcom Street London SE17 1NQ 105 Mansfield Point Rodney Road SE17 1BA 44b Brandon Street London SE17 1NL 106 Mansfield Point Rodney Road SE17 1BA Block D Flat 1 Peabody Estate SE17 1BJ 201 Mansfield Point Rodney Road SE17 1BA 304 Mansfield Point Rodney Road SE17 1BA 48a Larcom Street London SE17 1NQ Flat B 73 Larcom Street SE17 1NJ Flat A 75 Larcom Street SE17 1NJ 305 Mansfield Point Rodney Road SE17 1BA 306 Mansfield Point Rodney Road SE17 1BA Flat B 75 Larcom Street SE17 1NJ 303 Mansfield Point Rodney Road SE17 1BA 206 Mansfield Point Rodney Road SE17 1BA Block D Flat 4 Peabody Estate SE17 1BJ Block D Flat 5 Peabody Estate SE17 1BJ Block D Flat 6 Peabody Estate SE17 1BJ 301 Mansfield Point Rodney Road SE17 1BA Block D Flat 3 Peabody Estate SE17 1BJ 302 Mansfield Point Rodney Road SE17 1BA Block F Flat 1 Peabody Estate SE17 1BL Block E Flat 1 Peabody Estate SE17 1BT 701 Mansfield Point Rodney Road SE17 1BA 301 Stockham Court Rodney Road SE17 1AT Block D Flat 2 Peabody Estate SE17 1BJ 302 Stockham Court Rodney Road SE17 1AT Block E Flat 4 Peabody Estate SE17 1BT 303 Stockham Court Rodney Road SE17 1AT 63b Larcom Street London SE17 1NJ 206 Stockham Court Rodney Road SE17 1AT 203 Stockham Court Rodney Road SE17 1AT 61b Larcom Street London SE17 1NJ 69b Larcom Street London SE17 1NJ 204 Stockham Court Rodney Road SE17 1AT 45b Larcom Street London SE17 1NJ 205 Stockham Court Rodney Road SE17 1AT 46 Brandon Street London SE17 1NL 2 Morris Court Rodney Road SE17 1AW 3 Morris Court Rodney Road SE17 1AW Flat 4 66 Wansey Street SE17 1JP 31 Charleston Street London SE17 1NG 4 Morris Court Rodney Road SE17 1AW 38b Larcom Street London SE17 1NQ 1 Morris Court Rodney Road SE17 1AW 60b Larcom Street London SE17 1NQ 304 Stockham Court Rodney Road SE17 1AT 46b Larcom Street London SE17 1NQ 305 Stockham Court Rodney Road SE17 1AT 306 Stockham Court Rodney Road SE17 1AT 40b Larcom Street London SE17 1NQ 47b Larcom Street London SE17 1NJ 202 Stockham Court Rodney Road SE17 1AT 65b Larcom Street London SE17 1NJ 801 Mansfield Point Rodney Road SE17 1BA 802 Mansfield Point Rodney Road SE17 1BA 67b Larcom Street London SE17 1NJ 1-27 Rodney Place London SE17 1PP 803 Mansfield Point Rodney Road SE17 1BA Block E Flat 9 Peabody Estate SE17 1BT 705 Mansfield Point Rodney Road SE17 1BA Block E Flat 10 Peabody Estate SE17 1BT 702 Mansfield Point Rodney Road SE17 1BA Block E Flat 11 Peabody Estate SE17 1BT 703 Mansfield Point Rodney Road SE17 1BA

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

Re-consultation: n/a

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

Via Email x

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

## **APPENDIX 2**

## **Consultation responses received**

## **Internal services**

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

# Statutory and non-statutory organisations

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

# **Neighbours and local groups**

401 Tyler Court New Paragon Walk SE17 1AX