

Item No. 6.2	Classification: Open	Date: 19 July 2017	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 16/AP/5235 for: Full Planning Permission Address: VARCOE SERVICE STATION 1 VARCOE ROAD, LONDON SE16 3DG Proposal: Demolition of existing building and development comprising a part six, part 7 and part eight storey building to accommodate 57 new affordable residential units (Use Class C3) and provision of flexible employment/retail space on ground floor (Use Class B1, A1-A3).		
Ward(s) or groups affected:	Livesey		
From:	Director of Planning		
Application Start Date 21/12/2016		Application Expiry Date 22/03/2017	
Earliest Decision Date 21/03/2017		Time Extension Date 29/09/2017	

RECOMMENDATIONS

1. That planning permission be granted, subject to conditions and following the completion of a section 106 agreement.
2. That in the event that the section 106 agreement is not completed by 29 September 2017, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 129 of this report.

BACKGROUND INFORMATION

Site location and description

3. The application site is located on the western side of Varcoe Road, close to the junction with Verney Road. It measures 0.08 hectares (ha) and is currently used as a vehicle repair and spraying garage (use class B2). It contains an L-shaped single-storey plus mezzanine brick building with a corrugated concrete roof, and an open yard which is used for vehicle storage whilst they await repair. The building is located on the southern part of the site and is attached to a similar building on the adjoining site which is in use as a scaffold yard. There is a sharp bend in the road at this point, as Varcoe Road turns east.
4. The surrounding area is a mix of industrial and residential uses. There is a building in office use to the north of the site (Credon House), residential uses to the east and south-east (Batwa House and 6 and 8 Varcoe Road), and industrial uses to the south and west forming part of the T. Marchant Industrial Estate.



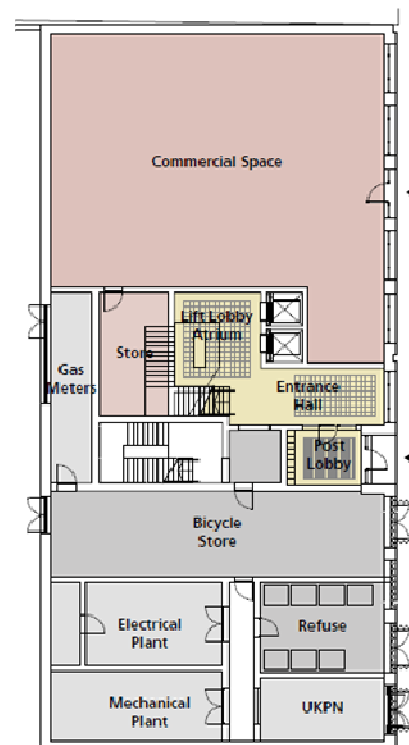
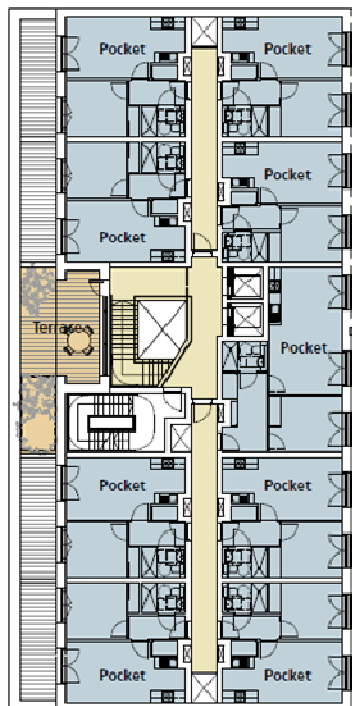
Details of proposal

5. Pocket Living has applied for full planning permission for demolition of the existing building and erection of a part 6, part 7 and part 8-storey building measuring a maximum of 26.9m high (28.1m AOD). It would contain 227.5sqm (GIA) of flexible employment/retail space on the ground floor (use classes A1 retail, A2 financial and professional services, A3 cafe/restaurant and B1 business) and 57 x 1-bedroom residential units on the upper floors. They would all be affordable units, falling within the intermediate tenure.
6. Pocket Living is a private developer which specialises in building space efficient, compact units of accommodation in London at a lower cost, and without public subsidy. Pocket units are principally one bedroom units (a minimum of 37sqm) designed specifically for single occupiers who wish to own their home outright, and are sold with a minimum discount of 20% of the open market value. This is the first application which Pocket has submitted in the borough, although Pocket units have been delivered in Westminster, Camden, Ealing, Hounslow, Hammersmith and Fulham, and Hackney, and are under construction in Lambeth, Lewisham, Wandsworth, Kingston and Waltham Forest. Pocket has constructed 270 units to date which are already occupied, and a further 384 are under construction. The developments are generally of around 20 - 60 units.
7. At ground floor level the proposed building would occupy almost the entire footprint of the site, although it would be set back 1.5m from the southern boundary to create a gap between it and the building on the adjoining scaffold yard. The commercial space would be located on the northern part of the site, with the residential entrance hall, bicycle store, refuse store, substation and plant rooms to the south of it. The upper floors of the building would step back from the western boundary creating a terrace at first floor level, and there would be external terraces at 6th and 7th floor levels.
8. The building would be faced with brick, with precast concrete banding and metal balustrades to Juliet balconies. Aluminium windows, and louvered doors to the substation, refuse and cycle stores are proposed.

Amendments

9. The following additional/revised information has been submitted during the course of the application:

- Updated daylight and sunlight information
- Updated sustainability statement
- Additional archaeology information
- Revised financial viability executive summary and full viability report
- Additional drainage information
- Service management plan submitted.



Planning history

10. 16/EQ/0191 - Residential-led mixed-use building comprising 57 one bedroom one person (1b1p) units with commercial unit on the ground floor. Pre-application enquiry, details of which are held electronically by the local planning authority. Discussions centred on the principle of the proposed development, height, scale and massing, impact upon neighbouring properties and affordable housing.

Planning history of adjoining sites

Credon House

11. 17/AP/1859 - Prior approval for the change of use from office (Use Class B1) to residential (Use Class C3) to form 8 residential units (4 x 1bed and 4 x 2 beds) - prior approval not required.
12. Planning permission for Batwa House was granted in 2004 (reference: 03/AP/1278) and for 6 and 8 Varcoe Road in 2008 (07/AP/2375).

KEY ISSUES FOR CONSIDERATION

Summary of main issues

13. The main issues to be considered in respect of this application are:
 - Principle of the proposed development's land use, including emerging policy for the Old Kent Road
 - Environmental impact assessment
 - Design
 - Density
 - Affordable housing
 - Housing mix
 - Quality of accommodation
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area
 - Transport
 - Trees and landscaping
 - Planning obligations (section 106 undertaking or agreement)
 - Mayoral and Southwark community infrastructure levy (CIL)
 - Sustainable development implications
 - Ecology
 - Contaminated land
 - Air quality
 - Water resources and flood risk
 - Archaeology
 - Statement of community involvement.

Planning policy

14. Planning Policy Designations (Proposals Map)
 - Urban density zone
 - Archaeological priority zone
 - Air quality management area
 - Preferred industrial location (strategic)
 - Old Kent Road opportunity area

- Area requiring 35% private and affordable housing.
15. The site has a public transport accessibility level (PTAL) of 3 (medium) and is not located in a controlled parking zone (CPZ). There are no conservation areas or listed buildings near to the site.

16. National Planning Policy Framework (the Framework)

Section 1 - Building a strong, competitive economy
 Section 4 - Promoting sustainable transport
 Section 6 - Delivering a wide choice of high quality homes
 Section 7 - Requiring good design
 Section 10 - Meeting the challenge of climate change, flooding and coastal change
 Section 11 - Conserving and enhancing the natural environment

National Planning Practice Guidance (2014).

17. The London Plan 2016

Policy 2.13 - Opportunity areas and intensification areas
 Policy 3.1 - Ensuring equal life chances for all
 Policy 3.3 - Increasing housing supply
 Policy 3.5 - Quality and design of housing developments
 Policy 3.8 - Housing choice
 Policy 3.9 - Mixed and balanced communities
 Policy 3.10 - Definition of affordable housing
 Policy 3.11 - Affordable housing targets
 Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
 Policy 4.3 - Mixed use development and offices
 Policy 4.4 - Managing industrial land and premises
 Policy 5.1 - Climate change mitigation
 Policy 5.2 - Minimising carbon dioxide emissions
 Policy 5.3 - Sustainable design and construction
 Policy 5.5 - Decentralised energy networks
 Policy 5.6 - Decentralised energy in development proposals
 Policy 5.7 - Renewable energy
 Policy 5.8 - Innovative energy technologies
 Policy 5.10 - Urban greening
 Policy 5.11 - Green roofs and development site environs
 Policy 5.12 - Flood risk management
 Policy 5.13 - Sustainable drainage
 Policy 5.14 - Water quality and wastewater infrastructure
 Policy 5.15 - Water use and supplies
 Policy 5.21 - Contaminated land
 Policy 6.9 - Cycling
 Policy 6.10 - Walking
 Policy 6.13 - Parking
 Policy 7.1 - Building London's neighbourhoods and communities
 Policy 7.2 - An inclusive environment
 Policy 7.3 - Designing out crime
 Policy 7.4 - Local character
 Policy 7.6 - Architecture
 Policy 7.8 - Heritage assets and archaeology
 Policy 7.14 - Improving air quality
 Policy 7.19 - Biodiversity and access to nature
 Policy 8.2 - Planning obligations

Policy 8.3 - Community infrastructure levy.

18. Core Strategy 2011

Strategic policy 1 - Sustainable development
Strategic policy 2 - Sustainable transport
Strategic policy 5 - Providing new homes
Strategic policy 6 - Homes for people on different incomes
Strategic policy 7 - Family homes
Strategic policy 10 - Jobs and businesses
Strategic policy 11 - Open spaces and wildlife
Strategic policy 12 - Design and conservation
Strategic policy 13 - High environmental standards
Strategic policy 14 - Implementation and delivery.

Southwark Plan 2007 (July) - saved policies

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

1.1 - Access to employment opportunities
1.2 - Strategic and local preferred industrial locations
2.5 - Planning obligations
3.2 - Protection of amenity
3.3 - Sustainability assessment
3.4 - Energy efficiency
3.6 - Air quality
3.7 - Waste reduction
3.9 - Water
3.11 - Efficient use of land
3.12 - Quality in design
3.13 - Urban design
3.14 - Designing out crime
3.19 - Archaeology
3.28 - Biodiversity
4.2 - Quality of residential accommodation
4.3 - Mix of dwellings
4.4 - Affordable housing
4.5 - Wheelchair affordable housing
5.2 - Transport impacts
5.3 - Walking and cycling
5.6 - Car parking
5.7 - Parking standards for disabled people and the mobility impaired.

20. Sustainable design and construction SPD (2009)
Sustainability assessments SPD (2009)
Sustainable Transport SPD (2010)
Residential Design Standards SPD (2011) and Technical Update (2015)
Affordable housing SPD (2008 - Adopted and 2011 - Draft)
Section 106 planning obligations and community infrastructure levy (CIL) SPD (2015)

Development Viability SPD (2016).

Principle of the proposed development's land use, including emerging policy for the Old Kent Road

21. The site is located in the Old Kent Road preferred industrial location (PIL) which is identified in the Core Strategy as a PIL of strategic importance. Strategic policy 10 of the Core Strategy states that the PILs will be protected for industrial and warehousing uses. The Core Strategy does however, recognise that structural changes in the economy are resulting in a declining need for industrial land in London, and sets out the future direction of Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP). Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in PILs are B class uses and other sui generis uses which are inappropriate in residential areas. Concerns have been raised by neighbouring occupiers that the application would be premature in relation to emerging planning policy for the area, lack of justification for B1 use on the site, and there is a vacant commercial unit at 8 Varcoe Road.
22. The London Plan designates the Old Kent Road as an opportunity area, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. It identifies the potential for residential-led development along the Old Kent Road corridor, with homes and jobs targets to be explored and further refined through the preparation of a planning framework and a review of the Old Kent Road strategic industrial location.

The New Southwark Plan

23. Work is under way to prepare both a New Southwark Plan (NSP) and an Old Kent Road AAP. The New Southwark Plan will replace the saved policies of the 2007 Southwark plan and the 2011 Core Strategy, and has reached the 'preferred option' stage. The council is currently consulting on a set of new policies and amendments to previously proposed policies which will run until 13th September 2017. The council is aiming to consult on the submission draft of the plan in autumn 2017, with a view to adopting the plan by 2018.
24. An earlier version of the NSP included policy DM23 which sought to review the PIL designations. This policy included requirements to intensify development, increase job numbers and promote the growth of business uses within new mixed use neighbourhoods, and advised that there should be no loss of employment space in the meantime. The latest version of the plan which is currently being consulted on proposes to delete this draft policy, with PILs to be dealt with through site allocations instead. DM24 of the draft NSP advises that in regeneration areas, development must retain or increase existing levels of business floorspace, except where there is no demand.

The Old Kent Road Area Action Plan

25. The Old Kent Road AAP will guide and manage new development and growth in the area over the next 20 years. The preparation of this plan has also reached the 'preferred option' stage, and the council is currently consulting on an interim set of new and amended policies until 13 September 2017. The council is aiming to consult on the submission draft of the plan towards the end of this year, with a view to adopting it by summer 2018.
26. The draft plan provides a vision and objectives for the opportunity area, including the delivery of 20,000 new homes in mixed use neighbourhoods, and the generation of 5,000 additional jobs. It places the site within the proposed action area core, and within proposal site OKR 16 which covers a large area extending north-eastwards

from Old Kent Road, towards Rotherhithe New Road. Required uses are residential, employment (B class to be clustered on sites to the south of the Surrey Canal green route), town centre uses focussed around Old Kent Road, community use (D class) and public open space. Student housing is identified as an acceptable use, and an indicative capacity of 3,045 homes is given. The proposed Surrey Canal green route is shown as passing through the southern section of the proposal site, connecting Sandgate Street and Varcoe Road. The council is currently consulting on proposals to extend the central activity zone and the boundary for an Old Kent Road major town centre, and the site would sit within both of these proposed designations.

27. Emerging policy AAP11a of the draft plan 'Businesses and workspace' includes requirements for proposals to retain or increase employment floorspace (GIA) on a site, to consolidate on-site servicing, to generate employment and increase the number of jobs provided, to accommodate existing businesses or provide relocation options, and to provide a business and relocation strategy incorporating workspaces into mixed use developments.
28. Both the NSP and the Old Kent Road AAP are in draft form at present and are still subject to consultation; therefore they can only be attributed limited weight at present. They do however provide an indication of the direction of travel for planning policy in the opportunity area.
29. The existing building on the site provides 350sqm of B class floorspace, with a further 550sqm within the yard area (900sqm in total); as stated, the yard is predominantly used for storing vehicles awaiting repair. The proposed development would provide a 227sqm flexible commercial unit, resulting in a loss of 673sqm of B class floorspace. Owing to the need to provide a residential entrance, cycle parking, refuse storage and plant space it would not be possible to increase the amount of commercial space at ground floor level. The loss of B class floorspace would be contrary to strategic policy 10 of the Core Strategy, saved policy 1.2 of the Southwark Plan and emerging policies in the NSP and AAP, and the introduction of residential use into the PIL would represent a departure from the adopted development plan.
30. In determining whether the principle of the proposed development would be acceptable in land use terms, members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused, and whether those benefits would therefore justify a departure from the adopted planning policy. Officers consider that the key benefits arising from the proposal would be as follows:

Job creation

31. At present most of the site is used for the storage of vehicles relating to the repair business, and the existing use only supports the equivalent of two full time jobs. Based on the employment densities guide the proposed commercial unit could support 14 jobs for B1 use and 11 jobs for A1 to A3 use and this is considered to be a positive aspect of the scheme. Future employees and new residents living at the site would use shops and services, and would contribute to the local economy.
32. As to whether there would be demand for the commercial space in this location, the applicant has submitted a letter from a property agent (Currell) which advises that the unit would be of a desirable size and could easily be split to create two units which would increase its attractiveness to the market. It advises that office occupiers require good floor to ceiling heights and natural light, and notes that the proposed floor to ceiling height would be in excess of 2.8m. The letter notes that some occupiers prefer this type of location, away from the noise and distraction of main roads, which may appeal to architects, designers, film companies and charities. The emerging planning policy for the opportunity area indicates that this area is going to change dramatically

over the coming years with a significant increase in the resident population. This too could generate demand for the commercial unit in the longer term.

33. The proposed commercial unit is not considered to be of a size which would cause harm to neighbouring town centres if it were used for A1 - A3 purposes. It would provide a local facility, and it is noted that in the future, the site is likely to be located in the action area core.
34. To mitigate the loss of B class floorspace which would arise, a contribution of £12,451 would be required towards skills and employment programmes in the borough. This has been calculated in accordance with the council's planning obligations and CIL SPD and would be secured through the section 106 agreement. Any forthcoming permission should also be subject to a condition requiring the commercial unit to first be marketed for B1 use for a period of 6 months, and A1 - A3 thereafter in the event that no B class occupier is found.

Provision of housing including affordable housing

35. The scheme would provide 57 affordable housing units which would be in the intermediate tenure for discounted sale. There is a pressing need for housing in the borough and the London Plan sets the borough a target of 27,362 new homes between 2015 and 2025; policy 3.3 of the plan supports the provision of a range of housing types. This is reinforced through strategic policy 5 of the Core Strategy which requires development to meet the housing needs of people who want to live in Southwark and London, by providing high quality new homes in attractive areas, particularly growth areas. The proposal would make a contribution to the borough's housing stock and would consist of 100% affordable housing which is a significant positive aspect of the scheme. It would also be in accordance with emerging policy for the Old Kent Road opportunity area and the expectation of significant new housing provision.
36. To conclude in relation to land uses, the proposed development would be contrary to strategic policy 10 of the Core Strategy owing to the loss of B class floorspace, and the introduction of retail and residential into the PIL would represent a departure from the adopted development plan. This must therefore be weighed against the benefits of the scheme including job creation, the provision of good quality, flexible commercial space, and the provision of 57 new affordable residential units. Although limited weight can be attached to the NSP and Old Kent Road AAP at present, the emerging policies in relation to job creation and the delivery of a significant number of new homes would not be compromised by the proposed development, and given the modest size of the site the loss of B class floorspace in this specific instance could be justified and mitigated through a section 106 contribution. In light of this officers consider that the principle of the proposed development in land use terms should be supported.

Environmental impact assessment

37. No request under Regulation 5 of the Town and Country Planning (EIA) (England) Regulations 2011 (as amended) has been submitted seeking confirmation as to whether the proposed development would require an environmental impact assessment. It is noted that the 2015 EIA regulations raise and amend the thresholds at which certain types of development project will need to be screened in order to determine whether an environmental impact assessment is required. The development could be considered an urban development project under schedule 2 of the regulations.
38. In the case of urban development projects, the 2015 regulations raised and amended

the 0.5 hectare threshold such that a project will need to be screened if:

- the development includes more than 1 hectare of development which is not dwellinghouse development; or
- the development includes more than 150 dwellinghouses; or
- the area of the development exceeds 5 hectares.

39. None of the above are applicable in this instance, therefore no screening is required. The 2017 EIA Regulations came into force on 16 May 2017, however as the application was received in December 2016 it is not affected by the new regulations.

Design

40. Strategic policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to “...*achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.*” Saved policy 3.12 ‘Quality in design’ of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. When we consider the quality of a design we look broadly at the fabric, geometry and function of the proposal as they are bound together in the overall concept for the design. Saved policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. Although only in draft form at present, policy 10 of the AAP ‘Building heights strategy’ advises that the prevailing building heights for new buildings in the core area will be between 5 and 8 storeys. It advises that development should contain variations in height to add interest and variety to development, to help signify places that are more important, and to help them relate more effectively to the surrounding environment. Concerns have been raised by neighbouring residents that the proposed building would be too high, would be too close to Batwa House, would be dominant in the streetscene and out of character with the area, and would represent an over-development of the site.
41. Officers consider that there should be no objection to the demolition of the existing building which is in a poor state of repair. It is simple and industrial in appearance, and contributes relatively little to the streetscene. It is physically attached to a building on the adjoining scaffold yard therefore a structural report has been submitted with the application, and this is considered further in the amenity section of this report.

Site layout

42. At ground floor level the building would occupy almost the entire footprint of the plot and given its relatively modest size, this is considered to be acceptable. The inclusion of a commercial unit would provide an active frontage to the street, and a condition preventing it from being obscure glazed or otherwise concealed is recommended. Areas where a substation, bicycle store and refuse store are required would not provide active frontages, but louvered metal doors would be used which would create less of a solid frontage, and a condition for details is recommended as these could incorporate a pattern or other device to enhance their appearance.
43. Policy AAP 22 ‘Green infrastructure’ of the draft AAP seeks to create a new green route broadly along the alignment of the former Surrey Canal and concerns have been raised that the proposal would not contribute to this. The draft plan shows this to the south of the site, connecting Sandgate Street with Varcoe Road. Whilst the

proposed building would be very close to the southern site boundary, a gap would be retained and in conjunction with the adjoining site were it ever to come forward for redevelopment, this would not compromise the ability to connect Sandgate Street and Varcoe Road in the future.

Height, scale and massing

44. The building would be expressed as two separate volumes along Varcoe Road, stepping up from 6-storeys on the southern section to 8-storeys on the northern section. On the southern section there would be terraces at 6th and 7th floor level, accessed via deep, covered external walkways.
45. The surrounding buildings on this part of the street range from 3 to 6-storeys high. Credon House which is the commercial building to the north of the site is 3-storeys high, with the top floor set within a mansard roof. Batwa House which is immediately opposite the site to the east is 6-storeys high where it faces the site with the top floor set-back, and it steps down to 3-storeys high on its southern elevation. 6 and 8 Varcoe Road which are two blocks to the south-east of the site are 6-storeys high with the top floor set back. Crown Apartments, which are further east along Varcoe Road, occupy a 5-storey building. Given this context, although at its highest point the building would be two storeys higher than Batwa House, it would not be significantly taller than its context and officers consider that it would be appropriate in the street scene and of a proportionate scale in relation to its neighbours. It would also fall within the 5 - 8 storey range set out in the draft AAP.



46. The massing of the building would be broken up into two complementary forms, which would be treated in a similar but distinctive architectural aesthetic. This is a sound approach in urban design terms, and would introduce to the site the variety and grain of a simple, albeit artificial 'plot-width'. Overall the proposal is considered acceptable in its height, scale and massing. The taller northern part would reflect the urban hierarchy across the site and would respond appropriately to the local view along Varcoe Road.

Detailed design

47. When we consider architectural design, we look at the proposal in terms of its fabric, function and composition. In its fabric, the design has been developed in the aesthetic of a turn of the century brick warehouse. Brick would be used in a gridded composition which would form the main ordering frame for the design. This gridded brick frame would be highlighted and articulated in parts with contrasting pre-cast concrete features, which would frame and layer the building to distinguish the two different volumes. The windows would be deep-set within the frame, and highlighted by Juliet balconies in metal to match the window frames. At ground floor level the building would be predominantly commercial in character, with a good sized active frontage and the main entrance lobby ensuring that Varcoe Road would benefit from natural surveillance and active edges.
48. The function of the building would be driven by the principle of compact living. Each unit, whilst modest in its proportions, would be characterised by large windows and complemented by attractive communal facilities. In addition to the roof-top communal terraces, the residential facilities would include double-height internal communal spaces designed to offer residents a pleasant environment.
49. In terms of its composition, the two volumes combining to provide one building would be appropriate and would respond appropriately to the site's context. The composition would extend to the detailed design of the two volumes, where the ordering device of the grid has been cleverly adapted to give the northern volume a more civic order, while the southern volume would have a more residential character. The base of the building would be defined by the commercial premises and the top would be articulated by the deep-set roof terrace. In this way the composition would be sound, with a well articulated aesthetic based on its urban model.



50. Concerns have been raised that the flank elevations of the building would not be acceptable and that a green wall should be incorporated onto the northern flank, although this could be difficult to achieve because the building would extend right up to the site boundary. A design and access statement (DAS) submitted with the application advises that the flank elevations would be decorated with hand painted murals. It may well be that in time the sites to the north and south will be redeveloped, but the provision of decoration on the flanks would ensure an acceptable visual appearance in any event, and a condition for details is recommended.
51. To conclude the proposal is considered to be high quality and appropriate in its urban

form and composition, and in its detailed design it would be highly articulated and well designed.

Density

52. Strategic policy 5 of the Core Strategy permits a density range of 200 - 700 habitable rooms per hectare in the urban density zone. Maximum densities may be exceeded where developments achieve the highest standard of design, exceeding minimum internal space standards as well as providing an acceptable standard of daylight and sunlight, privacy, good outlook and amenity space. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes and requires areas of non-residential space to be divided by 27.5 to create an equivalent in terms of habitable rooms per hectare. Based on this methodology, the density of the proposed development would equate to 1,537 hrh, in excess of the prescribed density range and this can in part be attributed to only one-bedroom units being proposed. It would also exceed the 650 - 1,100 hrh stated in emerging policy AAP5 of the draft Old Kent Road AAP and concerns have been raised by neighbouring occupiers in relation to overdevelopment of the site and unjustified, excessive density.
53. The Residential Design Standards SPD requires accommodation to be of an exemplary standard where density ranges would be exceeded. The proposal would result in a good standard of accommodation, although it could not be described as exemplary; this is assessed further later in the report. There is a need to optimise the use of land, and the building would be of an appropriate height; officers also consider that the impact upon neighbouring occupiers would be acceptable which is considered later in the report. In light of this it is considered that the higher density has not compromised the quality of the accommodation, and since the impacts of the development are considered to be acceptable, exceeding the density threshold would not warrant withholding permission.

Affordable housing

54. Affordable housing is defined in the NPPF as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.
55. Policy 3.11 of the London Plan 'Affordable housing targets' requires affordable housing provision to be maximised, and requires an average of at least 17,000 more affordable homes to be delivered per year during the plan period. It advises that 60% of affordable housing should be for social and affordable rent, and 40% for intermediate rent or sale, with priority to the provision of affordable family housing. It advises that boroughs should set an overall target for affordable housing provision, including separate targets for social/affordable rented and intermediate accommodation.
56. In Southwark, the council's affordable housing policies are set out in the Core Strategy and the saved Southwark Plan. Strategic policy 6 of the Core Strategy 'Homes for people on different incomes' requires at least 35% of the residential units to be affordable and at least 35% to be private. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms, and further information can be found in the council's draft Affordable Housing SPD (2011). With regard to tenure, saved policy 4.4 of the Southwark Plan requires a split of 70% social rented: 30% intermediate. Policy DM1 within the draft NSP seeks to amend this so that the required 35% affordable housing must comprise 10% intermediate and 25%

social rented.

57. As stated, Pocket Living is a private developer which specialises in providing compact units of accommodation within the intermediate tenure. In 2013 Pocket was awarded a £26.4m loan for 10 years by the Mayor of London to help thousands of working Londoners into home ownership. Pocket has committed to the Greater London Authority (GLA) that it will reinvest its profits alongside the Mayor's capital over the life of the programme. Returns made in a specific borough can be prioritised for future sites in that same borough.
58. Unlike conventional shared ownership and shared equity products where buyers increase their stake by 'stair casing', people buying Pocket homes own 100% of the equity and value of their home from day one, with a discount of at least 20% of the open market value. A restrictive covenant is put in place to ensure that the discount is retained in perpetuity, and passed on through any re-sales which are managed by Pocket. This is different from conventional shared-ownership units for example, which can staircase out as purchasers increase their share, and can eventually be sold on the open market without any restrictions. Pocket puts measures in place including annual inspections to ensure that the units are lived in by the purchasers, and will only grant consent for them to be rented out in exceptional circumstances and for a period of 12 months only. Rent levels are capped at 80% of the market rent and this too should be secured through the section 106 agreement.
59. Pocket homes fall within the NPPF definition of affordable housing because they would remain permanently affordable, and would be subject to the following eligibility criteria which would be secured through the section 106 agreement:

Income thresholds

60. Purchasers must have a household income at or below the council's intermediate affordable housing threshold which for a 1-bedroom unit is currently set at £46,136; the application submission advises that the average salary of a Pocket occupier is £41,332. If after three months of marketing no purchaser earning up to the council's income threshold has been found, income levels would increase to the Mayor's threshold which is currently set at £90k, and subject to a restriction that the units cannot be sold for more than four times the GLA income threshold (four times a person's income being that which can generally be obtained as a mortgage).
61. The applicant has submitted a financial viability appraisal (FVA) to demonstrate that the scheme is viable. This has been reviewed by a consultant appointed by the council who has confirmed that the scheme would be viable at the council's income threshold, and the residual land value is given as £1,112,544. The draft section 106 agreement includes a viability review mechanism which would be triggered if the affordable housing were to drop to below 100%.
62. The affordability of the proposed units to potential purchasers has also been considered. The council's consultant has advised that the 50 units which would be 37.8sqm would be affordable to people on the council's income threshold, but that the seven units measuring 49.5 - 50.1sqm which would be more expensive would potentially be beyond the reach of people earning £46,136. However, Pocket purchasers could apply for Help to Buy funding from the government, and could be purchased by people with larger deposits. In light of this all of the units, regardless of their size, should initially only be made available to those meeting the council's income threshold.

Purchasers must live or work in the borough

63. The submission advises that there are currently 30,000 people across London who have registered with Pocket. Of these, at present there are 903 eligible buyers who live or work in the borough and earn less than the GLA's income thresholds (67% of them earn less than the council's income threshold for 1-bed units). On the First Steps (Share-to-Buy) website there are 7,388 eligible buyers who live or work in the borough and earn below the GLA income threshold, and 2,753 who live or work in the borough and earn between £35 - £50k. As the council does not operate a waiting list for intermediate housing, potential purchasers would need to be registered with Pocket and First Steps (Share-to-Buy) and this would be secured through the legal agreement. If it were not possible to find a purchaser who lives or works in the borough, the units could be offered London-wide within the Mayor's income threshold.

They must not already own another property

64. It is recognised that the proposal would not provide any social rented or private units which are requirements under the Core Strategy and saved Southwark Plan. The FVA therefore also provides details of what could be delivered if a 'conventional' scheme comprising social rented, intermediate and private housing were proposed rather than the Pocket scheme. Under the 'conventional' scenario the FVA advises that 37% affordable housing could be delivered comprising 10 social rented and 4 shared-ownership units. The conventional scheme would only provide 39 units in total, so that some two and three bedroom units could be included to address the council's policy on housing mix. The council's consultant has confirmed that this scenario would also be viable, with a residual land value of £1,269,641
65. Whilst it has been demonstrated that under a 'conventional' scenario 37% affordable housing including 10 social rented units could be delivered, officers consider that the provision of 100% affordable housing is a significant positive aspect of the proposal and should be supported in this instance. It is a particular product aimed at helping people to get on the property ladder. The units would remain affordable in perpetuity unlike shared-ownership units, and would help to meet some of the demand highlighted above.

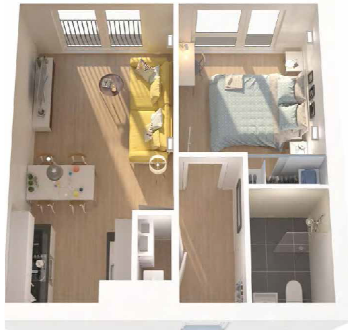
Housing mix

66. Strategic policy 7 of the Core Strategy requires a minimum of 60% 2+bed units and 20% 3+ bed units; a maximum of 5% studio units can be provided and these must be for private accommodation only.
67. Pocket's business model is to provide compact, 1-bedroom units of accommodation at below the market value to people seeking to secure a place on the property ladder, but who are being priced out of the market. The proposed development would only provide one-bedroom units which would deviate from strategic policy 7; however this is considered to be an exceptional case and should be weighed in the balance against the benefits of providing 100% affordable housing, without public subsidy. It is also noted that the proposal is for a mixed-use development including flexible commercial space, which would deliver both a resident and worker population onto the site.

Quality of accommodation

68. Saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. The council's Residential Design Standards SPD establishes minimum room sizes, and units should be dual aspect to allow for good levels of light, outlook and cross-ventilation.
69. A number of design principles are incorporated into all Pocket schemes in order to maximise space, comfort and sustainability. This includes floor-to-ceiling windows, a

low ratio of circulation space to livable space, high quality sound-proofing, built-in storage and high quality internal and external amenity spaces. The planning statement advises that Pocket has won awards from Housing Design, Building for Life, Cabe and the Evening Standard including Most Innovative Specialist Solution and Best First Time Buyer Home.



Unit sizes

70. As set out in the table below, all of the units would comply with or exceed the minimum standards set out in the nationally described space standards. The standards were updated in May 2016 to permit 1-bed/1-person units to be reduced from 39sqm to 37sqm where a shower room is provided instead of a bathroom, and all of the proposed units would have a shower room.

Units	Overall size sqm	National minimum required
50 x 1-beds	37.8sqm	37
5 x 1-beds	49.5sqm	37
2 x 1-beds	50.1sqm	37

Internal light levels

71. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers daylight and sunlight to the proposed dwellings. The tests which have been taken into account are:
- Average Daylight Factor (ADF) - ADF determines the natural internal light or day-lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.
 - Annual Probable Sunlight Hours (APSH) - This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months.
72. All of the units would comply with the BRE guidance in relation to ADF. For sunlight, 64% of the windows would comply with the guidance. Those which would not comply would be located at first to fourth floor levels and would receive APSH ranging from 14% to 21%, with winter hours ranging from 0% to 3%. Although the units would not fully comply in relation to sunlight, the 100% compliance on ADF and floor to ceiling heights of 2.5m is such that officers consider that a good standard of accommodation would be provided.

Aspect

73. All of the units would be single-aspect which would not usually be acceptable, although none would be north-facing. However, given the large windows, good floor-to-ceiling heights and full compliance in relation to ADF officers are satisfied that a good standard of accommodation would be provided.

Amenity space

74. Section 3 of the Residential Design Standards SPD sets out the council's amenity space requirements for residential developments and states that all flat developments must meet the following minimum standards and seek to exceed these where possible:
- 50 sqm communal amenity space per development
 - For units containing three or more bedrooms, 10 sqm of private amenity space
 - For units containing two or less bedrooms, 10 sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement
 - Balconies, terraces and roof gardens must be a minimum of 3 sqm to count towards private amenity space.
75. Pocket units are generally not provided with private external amenity space in order to reduce costs and keep the units affordable; they are instead provided with full height windows and Juliet balconies. In this instance however, four of the units at first floor level would have private west-facing terraces measuring 11.75sqm each which would exceed the 10sqm requirement set out in the Residential Design Standards SPD.
76. The proposal would provide 281sqm of outdoor amenity space in the form of external terraces; this would be 299sqm short of the amount required to make up for the shortfall in private provision. Whilst it is noted that a further 66.7sqm of internal communal space would be provided, the policy requirement is for outdoor space therefore a contribution of £61,295 is required to make up for the shortfall. This has been calculated in accordance with the council's planning obligations and CIL SPD, and would be secured through the legal agreement.
77. For the internal space, the communal entrance to the building would lead up to a double height atrium with large windows and doors leading out onto an external terrace. At third floor level there would be an internal amenity space leading out onto an external terrace, and at 4th-5th floor levels there would be a double height sun room with floor to ceiling windows facing west. It is envisaged that the internal spaces would be become community hubs for the residents, which would be furnished with tables and chairs and could be used for working and socialising. The provision of both internal and external spaces would ensure that there would be useable amenity space available throughout the year, and the variety of spaces proposed would help to foster a sense of community.

Wheelchair housing

78. Policy 3.8 of the London Plan 'Housing choice' requires ninety percent of new housing to meet building regulation requirement M4 (2) 'accessible and adaptable dwellings' (the proposal would comply with this) and for the remaining ten per cent to meet building regulation requirement M4 (3) 'wheelchair user dwellings'. The development would provide only two M4 (3) units, which would be at 6th and 7th floor levels, served by two lifts and which would measure 50.1sqm. This would equate to four habitable,

rooms and a total of 11 would be needed in order to meet the 10% requirement.

79. The applicant has advised that no further M4 (3) units are proposed because whilst Pocket has provided a number of wheelchair units in the majority of its developments, of the 20 developments completed to date no Pocket wheelchair unit has been sold to a wheelchair user. The applicant has attributed this to the demographics of Pocket purchasers, who tend to be between 24-40 years of age. The council's planning obligations and community infrastructure levy (CIL) SPD provides the method for calculating a contribution towards the council's wheelchair accessible housing offset fund and in this instance a contribution of £70k would be required to address the shortfall and this has been included in the draft section 106 agreement.

Noise and vibration

80. The site is located within a preferred industrial location, and the proposed residential units would adjoin existing industrial units within the T Marchant Industrial Estate. An environmental noise assessment has therefore been undertaken to assess whether the site would be suitable for residential development. The assessment concludes that with the use of robust glazing, noise levels within the flats would fall within acceptable levels, and that vibration levels at the site are low. The report has been reviewed by the council's environmental protection team (EPT) and a condition to secure appropriate internal noise levels is recommended, which should minimise the likelihood of noise complaints against the existing industrial occupiers.
81. Whilst the external amenity space on the western boundary could experience some noise, there would be a variety of spaces within the development including internal space and an external terrace at 6th floor level which would be shielded from the industrial uses to the west. Although it does not contain any west-facing amenity spaces and only very small windows, it is also noted that the existing residential buildings at 6 and 8 Varcoe Road adjoin the scaffold yard.

Secure by design

82. The submission has been reviewed by the Metropolitan Police who have recommended a condition to ensure that the development would achieve 'Secured by Design' certification, and this has been included in the draft recommendation.
83. To conclude in relation to quality of accommodation, although the proposal would not fully comply with the council's Residential Design Standards SPD, it is nonetheless considered that a good standard of accommodation would be provided. The units would comply with the nationally described space standards, would receive good levels of daylight and would have access to a variety of high quality communal amenity spaces.

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

84. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work; saved policy 3.2 of the Southwark Plan states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight. Concerns have been raised by neighbouring residents regarding loss of light, overshadowing and loss of privacy.

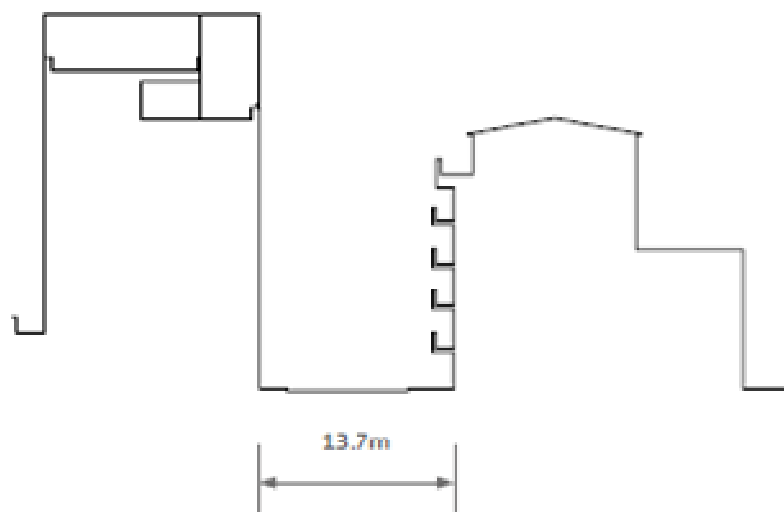
Impact of the proposed uses

85. The provision of a flexible commercial unit and residential accommodation would not adversely impact upon the amenity of neighbouring residential occupiers in the vicinity. B1 uses generally sit comfortably alongside residential uses and subject to hours of use and ventilation/extraction conditions, no loss of amenity would occur from A1-A3 use. Plant noise from the proposed development has been considered, and EPT has recommended a condition to limit noise output which would protect the amenities of existing and future occupiers. Varcoe Road is predominantly residential, and it is not considered that the introduction of additional residential units would adversely impact upon the amenity of neighbouring occupiers.

Physical impact of the proposed building

Privacy and overlooking

86. The Residential Design Standards SPD recommends a minimum of 21m at the back of properties to prevent any overlooking, and 12m where properties would face each other across a highway.
87. There would be a window-to-window separation distance of 13.7m between the proposed building and Batwa House which is opposite the site to the east; this would exceed the 12m recommended in the Residential Design Standards SPD and whilst the balconies would be around 1m closer, they are currently open to the street and it is not considered that their use would be unduly impacted. The large external roof terraces proposed at 6th and 7th floor levels could give rise to some noise and disturbance if they were used late at night; therefore a condition preventing them from being used beyond 11.00pm is recommended.
88. The proposed building would be approximately 8m from the side elevation of 6 Varcoe Road and whilst this would be quite close, the relationship would be oblique. The north-facing windows in the neighbouring building face Batwa House and those in the side overlook the scaffold yard; with the exception of one bedroom, these are identified in a daylight and sunlight report as serving non-habitable spaces. The 6th and 7th floor terraces would have views towards this building, therefore a condition for some screening to the terraces is recommended.



Daylight and sunlight

89. A daylight and sunlight report based on the BRE guidance has been provided. It has been amended during the course of the application to correct some errors relating to property addresses, to take into account the approved layouts of flats within Batwa House, and to include a mirror image test in relation to Batwa House which is considered further below.
90. The following tests within the document have been considered
91. Vertical sky component (VSC) is the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.
92. No-sky line (NSL) is the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20% reduction).
93. Sunlight - annual probable sunlight hours (APSH). This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.
94. Overshadowing - The BRE guidance advises that for an outdoor area to appear adequately sunlight throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on 21 March. If an area would not meet the above and the area which can receive two hours of sun on 21 March is less than 0.8 times its former value, the loss of sunlight is likely to be noticeable. Concerns have been raised that no shadow drawings have been submitted with the application. However, the daylight and sunlight report concludes that the proposed development would not create any new areas which would receive less than two hours of sunlight on 21 March, and that the proposal therefore complies with the BRE guidance in this respect.
95. The daylight and sunlight report considers the impact of the proposal on the following properties:
 - Batwa House, Credon Road
 - 6 and 8 Varcoe Road (these are the two blocks of flats to the south-east of the application site which adjoin the scaffold yard - the daylight and sunlight report describes them as 4 - 28 Varcoe Road)
 - 20 Varcoe Road (this is a block of flats further east along Varcoe Road)
 - 1 - 3 Ryder Drive
 - 82, 101 and 103 Verney Road.

Batwa House

96. This building directly faces the application site. In relation to the VSC test, of the 83 windows tested, 50 (60%) would not comply with the BRE guidance, with reductions ranging from 22% to 87% as set out in the table below.

Reduction	No. of windows affected	Residual VSC range (%)
21-30%	3	9.4% to 24.8%
31-40%	6	8.4 % to 25.5%
41-50%	17	6.6% to 21%
51-60%	10	11.7% to 19.4%
61-70%	10	8.7% to 15%
71-80%	2	6% to 7.8%
81-90%	2	3.2% to 4.4%

97. Where windows do not pass the VSC test the NSL test can be used, and based on this of the 83 windows tested, 34 (41%) would not comply with the BRE guidance, with percentage reductions as set out below.

Reduction	No. of windows affected
21-30%	3
31-40%	5
41-50%	3
51-60%	1
61-70%	0
71-80%	6
81-90%	16

98. With regard to sunlight, of the 74 windows tested, 36 (49%) would not comply with the BRE guidance, with percentage reductions as set out below:

Reduction	No. of windows affected (total AHSP)	No of windows affected (winter sunlight hours)
1-20%		3
21-30%		1
31-40%	4	3
41-50%	7	6
51-60%	14	3
61-70%	4	4
71-80%	3	5
81-90%	3	0
90-100%	1	4

99. The above demonstrates that there would be some significant, adverse impacts upon daylight and sunlight to some of the residential units within Batwa House including four which would lose all of their winter sunlight. However, this can in part be attributed to the fact that the existing building on the site is modest in size, measuring 4m to the eaves and with an overall height of around 8m; most of the site is an open yard. As such it has little, if any impact upon levels of light to the surrounding properties and the existing windows in Batwa House currently experience very good daylight levels. For example, of the 83 windows tested for VSC, 57 of them (69%) currently have VSCs in excess of 27%. Some of the existing values are particularly high, including 51 windows which have VSCs ranging from 30% to 39.5%.
100. For the VSC test, most of the non-compliant windows (60%) serve bedrooms. The same applies for the NSL and sunlight tests, with 62% and 55% respectively of the non-compliant windows serving bedrooms (this takes into account four living rooms which are incorrectly labelled as bedrooms within the daylight and sunlight report). For assessing daylight levels within new developments the BRE guidance sets a lower target for bedrooms than for kitchens and living rooms, presumably because bedrooms are predominantly used at night and for sleeping. The 14 kitchen/living/dining spaces (LKDs) which would not comply with the BRE guidance

would have VSC levels of between 3.2% and 21% and two kitchen windows would have retained VSC levels of 12.3% and 12.8%.

101. The flats in Batwa House have balconies facing the site and the BRE guidance notes that balconies to existing buildings can reduce levels of light to the rooms they serve. The daylight and sunlight report therefore includes an assessment with the balconies at Batwa House removed. This shows that for VSC the number of non-compliant windows would drop from 60% to 52%, and the retained VSC results would range from 12.4% to 26.6% rather than the 3.2% to 25.5% with the balconies in place. For NSL the balconies excluded test shows that the number of non-compliant windows would drop from 41% to 39% which shows that the existing balconies affect daylight levels to the rooms they serve.

The mirror image test

102. Given the modest size of the existing building on the site and the fact that most of it is open yard, a mirror image test has been undertaken. This considers what impact building a mirror image of Batwa House on the application site would have upon the existing Batwa House. It is considered that it would be reasonable in townscape and amenity terms to construct a building which mirrored its neighbour opposite. It demonstrates that if a mirror image were constructed on the site 49% of the windows would not comply in relation to VSC, 33% would not comply with the NSL test and 31% would not comply in relation to sunlight. This compares with 60% VSC, 41% NSL and 49% sunlight for the proposed scheme and this demonstrates that even though the proposed building would have a greater impact, a mirror image would also have significant impacts upon the neighbouring building.
103. The Planning Statement submitted with the application advises that to achieve BRE compliance, any building on the site would have to be limited to 3-storeys in height. Officers consider that 3-storey buildings on the site would appear out of context with the neighbouring buildings on this part of Varcoe Road and would not optimise the use of the land. There are likely to be other instances within the Old Kent Road opportunity area where existing residential properties look out onto low-rise industrial units and yards. Requiring full BRE compliance could therefore compromise the ability to deliver the 20,000 new homes expected in the opportunity area and it is noted that the AAP is predicated on a prevailing building height of 5 to 8 storeys within the core area. In light of this, and given that in townscape terms the height of the proposed building would be acceptable and the proposal would deliver 100% affordable housing, on balance the impact upon the existing flats within Batwa House is considered to be acceptable.

6 and 8 Varcoe Road

104. These are the two blocks to the south-east of the application site which adjoin the scaffold yard. Of the 80 windows tested, two would fail in relation to VSC with percentage reductions of 23% and 27% which would not be significant. All of the windows tested would pass in relation to NSL and sunlight.

20 Varcoe Road

105. This is a block of flats located further east along Varcoe Road. Of the 53 windows tested, one would fail in relation to VSC with a 23% reduction which would not be significant. All of the windows tested would pass in relation to NSL and sunlight.

1 - 3 Ryder Drive

106. These properties are located to the north of the site, on the opposite side of Verney

Road. All of the windows tested would pass in relation to VSC and sunlight. The position of these buildings relative to the application site and is such that they do not need to be tested for NSL.

Arundel Court, 82 Verney Road

107. This building is located to the north-east of the site, behind Batwa House. All of the windows tested would pass in relation to VSC. NSL and sunlight testing is not required for this building.

101 - 103 Verney Road

108. This building is located to the north-east of the site and all of the windows tested would pass in relation to VSC. NSL and sunlight tests are not required for this building.

Impact on the T Marchant Industrial Estate

109. The existing building would have to be carefully demolished so as not to damage the fabric of the adjoining building which serves the scaffold yard. A structural report has been submitted which considers how this could be achieved, and concludes that demolition of the existing building should not present many issues and that the new building could be constructed so as to have a negligible impact on the adjoining sites and structures. The applicant would need to obtain building regulations approval and the relevant party wall surveys and agreements in order to construct the building.
110. Although the building would extend right up to the northern and western site boundaries, no windows are proposed on the north elevation and the residential units would be set approximately 2.4m back from the western boundary. Subject to sound-proofing within the flats, it is not considered that this would hinder the operation of the industrial units.
111. Concerns have been raised that daylight and sunlight to the estate has not been adequately addressed, and that the proposed development would not be a good neighbour which could compromise the development potential of the industrial estate.
112. The original daylight and sunlight report submitted with the application contains an assessment of the industrial units within the adjoining estate, although it incorrectly identifies the space as habitable. The unit closest to the proposed building is 60 - 62 Verney Road which has a number of roof-lights, and the report concludes that the impact upon this proposal would comply with the BRE guidance.
113. There is a test within the BRE guidance which considers the potential impact upon adjoining development sites. The DAS considers how the neighbouring sites could be developed and shows new blocks parallel to Verney Road and north-south blocks with routes through connecting Verney Road with Sandgate Street to the south. The daylight and sunlight report advises that based on this type of arrangement it would be possible to provide adequately day-lit residential accommodation on the adjoining sites.
114. Concerns have been raised on behalf of the owners of the industrial estate that do not wish to develop the site in the manor shown in the DAS. Whilst this is noted, the adjoining site could be developed in any number of ways, and the DAS considers only one possible layout; it would not be reasonable to expect all potential scenarios to be considered. Officers are satisfied that the proposed development could proceed, without unduly hindering the development potential of the adjoining sites.

Transport issues

115. Saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 requires that the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards. The site has a PTAL (public transport accessibility level) of 3 (medium) and is not located in a controlled parking zone (CPZ). Concerns have been raised by neighbouring residents regarding increased traffic, lack of parking, access to the scaffold yard and access to Batwa House.

Servicing

116. Saved policy 5.2 of the Southwark Plan requires servicing to be provided on site and in this instance, on-street servicing is proposed. The commercial unit and residential units could generate up to 7 servicing trips per day in the morning and evening peaks respectively which would have a negligible impact upon the highway network. A servicing management plan has been submitted which demonstrates that on-street servicing could take place in conjunction with servicing of the scaffold yard without any adverse effects, although waiting restrictions around the scaffold yard entrance may need to be extended. Providing on-site servicing would reduce the amount of commercial floorspace and result in a loss of active frontage and given the modest size of the site and acceptable highway impact, officers raise no objections to on-street servicing in this instance. Highway works to create an on-street waiting area would be secured through the section 106 agreement.
117. Concerns have been raised regarding the adequacy of the proposed refuse storage, and that issues such as fly-tipping and vermin could arise. A refuse store would be provided fronting Varcoe Road meaning that it would be easy to access, and a condition to secure this facility is recommended. It is noted that a number of the doors along the street frontage are shown as opening outwards, and a condition requiring them to be inward opening is recommended, to prevent any obstructions.

Trip generation

118. A transport statement (TS) submitted with the application advises that the existing use generates 28 vehicle trips throughout the day. There would be an additional 9 vehicle trips during the morning peak and 9 vehicle trips during the evening peak as a result of the proposal, and this would have a negligible impact upon the local transport network.

Car parking

119. As stated the site is not located within a CPZ, and no off-street parking would be provided to serve the development.
120. A parking survey was undertaken on the 13 October 2016 to review the on-street parking demand across a typical weekday within the vicinity of the site. The survey reviewed on-street parking within 200m of the site every hour between 5.00am and 7.00pm. There are 280 parking spaces within the survey area, and the daytime average of occupied spaces was 70% (195 bays), with the highest levels recorded at 9am where 77% (215) of the spaces were occupied. This means at that at the busiest time, there were 65 spaces available.
121. Based on surveys of existing Pocket purchasers, only 3% of the future occupiers (2 people) are likely to own vehicles. Even if all of the potential employees (14) associated with the commercial unit required a space, they could still be accommodated on-street. The required highway works should not result in any loss of

existing parking spaces, because new spaces could be provided where existing crossovers are reinstated.

122. In light of the above, officers raise no objections to the application on parking grounds. It is recommended however, that in order to encourage sustainable modes of travel occupiers of the development should be prevented from obtaining a parking permit in any future CPZ which may be designated at this site and that car club membership be provided. It is noted that neighbouring residents have raised concerns regarding the possible designation of a CPZ, but this would be subject to consultation with affected residents in the future

Cycle parking

123. The London Plan requires 60 cycle parking spaces to serve the proposed development and 63 spaces would be provided. However, there should be separate stores for the commercial and residential uses and no short-stay parking is shown. In light of this a condition for revised details is recommended.
124. For the reasons set out above and subject to conditions and section 106 obligations, officers consider that the transport impacts of the proposed development would be acceptable.

Trees and landscaping

125. Saved policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
126. There are no trees on or near to the site which would be affected by the proposed development, and the site does not contain any landscaping. The design and specification of the proposed external terraces would need to be sufficiently robust to provide the quality and use aspired to for the development. As such, conditions should be imposed upon any forthcoming permission requiring full landscaping details and a landscape management plan to be submitted for approval, and these have been included in the draft recommendation.

Planning obligations (section 106 undertaking or agreement)

127. Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that local planning authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the council's adopted Planning Obligations and Community Infrastructure Levy SPD. A section 106 agreement is currently being drafted which should include clauses to secure the following:

- Contribution to mitigate for loss of B class floorspace: £12,451
- Outdoor amenity space: £61,295
- Affordable housing monitoring fee: £12,020
- Wheelchair housing fund: £70k
- Carbon off-set fund: £66,960
- Archaeology contribution: £3,389

Total: £226,115

Admin charge (2% of total) £4,522.30

Overall total: £230,673.30

128. In addition, the following non-financial contributions would be secured within the section 106 agreement:

- Employment in the completed development provisions including fall-back contribution if targets not met
- Affordable housing terms including income thresholds and eligibility criteria
- 3 years car club membership for eligible adult residents
- Future-proofing for combined heat and power (CHP) connection, if feasible
- Wheelchair marketing provisions
- Section 278 agreement to secure the following:
 - re-paving the footway fronting the development including new kerbing on Varcoe Road
 - re-instatement of the redundant vehicle crossovers on Varcoe Road as footway
 - provision of dropped kerb at the front of the refuse store on Varcoe Road
 - repair of any damage caused to the highway within the vicinity of the development due to construction vehicles
 - introduction of a length of waiting restrictions at the front of the refuse store and around the entrance to the adjoining scaffold yard.

129. In the event that a satisfactory legal agreement has not been entered into by 29 September 2017 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

'The proposal, by failing to provide for appropriate planning obligations secured through the completion of a section 106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2016) and the Planning Obligations and Community Infrastructure Levy SPD (2015).'

Mayoral and Southwark community infrastructure levy (CIL)

130. Concerns have been raised regarding the impact of additional residents on local services such as public transport, GP and dentist surgeries.

131. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.

132. In this instance a Mayoral CIL payment of £145,975 and a Southwark CIL payment of £198,066 would be required.

133. Transport for London (TfL) has commented that it may be appropriate to seek additional section 106 funding towards strategic transport capacity, particularly the Bakerloo Line extension stations. The council will be revising its CIL charging schedule and is currently consulting on an addendum to the 2015 Section 106 Planning Obligations and CIL SPD which sets out how the council will use section 106 planning obligations and CIL in the Old Kent Road opportunity area. The SPD

addendum is in draft form, and examination and adoption is planned for late 2017. In light of this it is not possible to capture any additional CIL or section 106 contributions at this time.

Sustainable development implications

134. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. Of note is that residential buildings must now be carbon zero, and non-domestic buildings must comply with the Building Regulations in terms of their carbon dioxide emissions.

135. The applicant has submitted an energy statement in support of the application and in relation to the Mayor's energy hierarchy, and the following is proposed:

Be lean (use less energy)

136. Measures proposed include high levels of insulation and air tightness, energy efficient lighting and high performance glazing. These measures would reduce carbon dioxide emissions by 4.9% for the residential units and 31.4% for the commercial space.

Be clean (use energy efficiently)

137. The submission advises that it is not possible to connect to an existing heating network, and that a centralised system is not suitable owing to insufficient plant space at ground floor level. In light of this no CO² reductions would be achieved under this category, but the draft section 106 agreement makes provision for future proofing in the event that a district heating network is developed in the future, the event that connection is found to be feasible.

Be green (use renewable energy)

138. Measures proposed under this category are photovoltaic panels (PVs) to provide electricity, and air source heat pumps to provide heating and cooling to the commercial space. The PVs would reduce CO² emissions from the residential units by 14.7% and the air source heat pumps would reduce the CO² emissions from the commercial space by 1.1%.

139. The overall CO² reductions as a result of the measures described above would be 19.5% for the residential units and 35.2% for the commercial space. As carbon zero would not be achieved for the residential units, a contribution of £66,960 would be required towards the council's carbon offset - green fund.

140. Strategic policy 13 of the Core Strategy requires the commercial unit to achieve BREEAM 'excellent' and a revised sustainability statement has been submitted which advises that this could be achieved. A condition to secure this is therefore recommended.

141. The Core Strategy requires a 20% CO² reduction from renewables. In this instance only 12.4% would be achieved which is in part due to the roof form of the building, part of which would be used to provide amenity space. As set out above a contribution towards the council's carbon offset - green fund would be secured through a section 106 agreement.

142. Saved policy 3.3 of the Southwark Plan "Sustainability assessment" advises that

planning permission will not be granted for major development unless the applicant demonstrates that the economic, environmental and social impacts of the proposal have been addressed through a sustainability assessment.

143. The sustainability statement submitted in support of the application sets out a summary of the economic, environmental and social impacts of the proposal. This includes the provision of 100% affordable housing, high quality internal and external communal amenity spaces, the provision of employment space in the development and measures to reduce carbon dioxide emissions.

Ecology

144. Saved policy 3.28 of the Southwark Plan states that the local planning authority will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, requiring an ecological assessment where relevant.
145. A preliminary ecological appraisal has been submitted with the application which advises that the site is considered to be of no importance for protected species or other species of conservation interest, and that the proposal is unlikely to have any significant adverse impacts on local biodiversity. The appraisal recommends that measures be undertaken to avoid harm to nesting birds during site clearance, and that ecological enhancements including native planting should be incorporated into the development.
146. The appraisal has been reviewed by the council's ecology officer who agrees with its findings, and recommends conditions for nesting bricks to be incorporated into the development which have been included in the draft recommendation.

Contaminated land

147. A geo-environmental desktop study report has been submitted which advises that the site has a medium to high risk of being contaminated. The report has been reviewed by EPT and the Environment Agency (EA) and a condition is recommended requiring further investigations and any necessary remediation be undertaken.
148. A detailed unexploded ordnance (UXO) survey has also been carried out which indicates a low risk for the northern part of the site but a medium risk for the southern part. An informative is recommended which alerts the applicant to the need to carry out specialist surveying work and to notify the police and the council in the event that any anomalies are detected.

Air quality

149. The site is located in an air quality management area. Policy 7.14 of the London Plan 'Improving air quality' seeks to minimise the impact of development on air quality, and sets a number of requirements including minimising exposure to existing poor air quality, reducing emissions from demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality.
150. An air quality assessment has been submitted with the application which considers impacts during the construction and operation of the development. It advises that mitigation measures would be required during construction to control dust, and that with measures in place, construction impacts would be insignificant. It advises that the completed development would have an insignificant impact upon air quality, and would be air quality neutral.

151. EPT has reviewed the document and advised that it is acceptable, subject to a construction management condition which should limiting emissions from certain types of construction machinery. This would also need to consider construction vehicle routes, parking and working hours, and a condition has been included in the draft recommendation.

Flood risk and water resources

152. Concerns have been raised by neighbouring residents regarding the impact of the proposed development on water pressure and drainage.
153. The site is located in flood zone 3 which is identified as having a high risk of flooding. Paragraph 100 of the NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. However, the council's strategic flood risk assessment acknowledges that development within flood zone 3 is required, and is allowed with the application of the exception test set within the NPPF.
154. For the exception test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and that a site-specific flood risk assessment must demonstrate that no adverse impacts would occur.
155. The site is located on previously developed land and there are strong sustainability reasons why it should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall in housing in the area. The site has reasonable access to public transport and the proposed design is capable of providing a good quality housing, with less vulnerable commercial space at ground floor level.
156. A flood risk submitted with the application has been amended on the advice of the council's flood and drainage team and is found to be acceptable. The EA has recommended the inclusion of flood resilience measures therefore an informative to this effect has been included in the draft recommendation, together with conditions and informatives recommended by Thames Water. One of the Thames Water informatives relates to the amount of water pressure that they would seek to deliver to the site, and advises that the development must be designed accordingly. Thames Water has not raised water pressure as an issue.
157. The Core Strategy and the London Plan require all new dwellings to achieve a water efficiency of 105 litres per head per day (excluding an allowance of 5 litres of less per head per day for external water consumption). The submission advises that water efficient fittings would be used throughout the development and that the dwellings would comply with the consumption target and a condition to this effect is recommended.

Archaeology

158. The site is located within the 'Bermondsey Lake' archaeological priority zone. Saved policy 3.19 of the Southwark Plan 'Archaeology' requires proposals for development in archaeological priority zones to be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report.
159. An archaeology and heritage assessment has been submitted, and has been revised during the course of the application. The revised document is considered to be acceptable, and a number of conditions are recommended.

Statement of community involvement

160. Details of consultation undertaken by the applicant on the proposed development prior to submission of the planning application have been provided.
161. Letters were sent to 313 local residents and businesses inviting them to a public exhibition which was held at the Links Community Centre, Rotherhithe New Road on 6 July 2016. The exhibition was attended by seven people and the main feedback received related to the height of the proposed development, parking and disruption to traffic; many people welcomed the provision of affordable housing for local people. Following the public consultation event the height of the building was reduced by a storey.

Conclusion on planning issues

162. The proposed development would result in a loss of B class floorspace, and the introduction of residential and potentially A class uses in to the PIL would represent a departure from the adopted development plan. The draft New Southwark Plan and Old Kent Road AAP do however, provide an indication of the direction of travel for planning policy in the area, and there is an expectation of additional jobs and significant levels of new housing. Although the proposal would result in a loss of B class floorspace, the site is modest in size, mainly used for storage, and supports a low level of jobs. The proposed development would increase the numbers of jobs on the site and deliver new housing, all of which would be affordable. In light of this it is considered that the principle of the proposed development should be supported in this instance.
163. Whilst the proposal would deliver a good standard of accommodation, it is recognised that the proposal does not comply with some of the minimum residential design standards adopted by the council, and would not comply with policies relating to housing mix, wheelchair housing or affordable housing tenure. This must therefore be weighed in the balance against the benefits of the affordability of this modern model of housing. Taken in the round this proposal could play a role in offering a variety of housing types, although it is not intended to replace general needs housing provided across the borough.
164. It is also recognised that the proposed development would have some significant adverse impacts upon daylight and sunlight to flats in Batwa House, although this is largely because the existing site is mostly yard, and the building on it is of limited height. Most of the rooms affected would be bedrooms, and in townscape terms the maximum 8-storey height is considered to be acceptable and would be in accordance with emerging policy in the draft AAP.
165. On balance therefore, whilst it is recognised that the proposal presents a number of issues, given the benefits arising in relation to job creation and the delivery of new affordable housing and in the light of the emerging policy context, the application is recommended for approval.

Community impact statement

166. In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.

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

Consultations

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

Consultation replies

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

Summary of consultation responses

169. 14 representations and a petition containing 49 signatures have been received from neighbouring occupiers objecting to the application on the following grounds:

- Lack of pre-application consultation with adjoining industrial estate
- Planning Statement affords too much weight to the emerging planning policies/application is premature
- Proposal would not contribute to the delivery of the Surrey Canal green route
- No infrastructure would be delivered
- Lack of justification for the B1 accommodation proposed/commercial unit at 8 Varcoe Road is vacant
- Density/overdevelopment of the site/overcrowding
- Units too small
- Concerns regarding CPZ exemption as time scales are unknown, costs should be shared between developments and low car ownership is only assume
- Openable, habitable windows next to industrial estate could harm its operations
- Loss of daylight and sunlight and inadequate daylight and sunlight report
- Would hinder redevelopment potential of adjoining industrial site
- Building too high and too close to Batwa House
- Building should be limited to 4 -storeys or 15m
- Flanks of building should be improved
- Reduced access to Batwa House
- Increased traffic and lack of parking
- Increased noise, anti-social behaviour, fly-topping, crime and pest potential
- Loss of privacy and impact on use of balconies at Batwa House
- Impact upon existing shops, transport, GP and dentist surgeries
- Access to scaffold yard
- Impact on water pressure and drainage
- Is an existing lack of children's play-space leading to anti-social behaviour and the proposal will aggravate this
- Construction impacts including the attraction of vermin
- Reduction in solar gain to Batwa House, resulting in increased heating costs
- Loss of a view and impact upon property prices - **officer response** - these are not material planning considerations and cannot be taken into account.

170. 40 representations have been submitted in support of the application on the following grounds:

- Welcome the provision of affordable housing
- Will help people into home ownership
- Large demand for housing in Southwark
- The plans would make a good use of the site and would be sensitive to the local area
- Will allow local people to stay in the area
- First time buyers are ineligible for social housing.

Re-consultation responses (re-consultation undertaken on additional/revised documents submitted)

171. 1 x further support:

- Welcome the plans to provide 57 affordable intermediate homes where there is huge demand.

172. 1 x further support:

- Welcome the plans to provide 57 affordable intermediate homes where there is huge demand.

173. Environmental protection team - conditions recommended.

174. Flood and drainage team - revised details acceptable.

175. Local economy team - details of employment provisions provided.

176. Ecology officer - conditions recommended.

177. Highways development management team - highways requirements provided.

178. Environment Agency - No objections, subject to contamination conditions. Flood resilience measures should be incorporated into the development.

179. Thames Water - Conditions and informatives recommended.

180. Transport for London - proposals unlikely to have any significant impact upon TfL assets or services when taken in isolation. The site is within the Old Kent Road opportunity area where significant growth is anticipated. The council is consulting on a revised CIL charging regime to fund transport infrastructure to support growth. May be appropriate to seek additional section 106 funding towards strategic transport capacity, particularly the proposed Bakerloo line extension.

181. Metropolitan Police - if the application proceeds it should be able to achieve Secured by Design certification and a condition to this effect should be imposed.

182. Natural England - no comments. The application has not been assessed for impacts on protected species; standing advice and the council's own ecology advice should be referred to.

Human rights implications

183. 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.

184. This application has the legitimate aim of providing a commercial unit and 57 flats. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2324-49 Application file: 16/AP/5235 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquires telephone: 020 7525 5403 Planning enquires email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5410 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Victoria Lewis, Team Leader	
Version	Final	
Dated	7 July 2017	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director, Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team	7 July 2017	

Consultation undertaken

Site notice date: 20/01/2017

Press notice date: 19/01/2017

Case officer site visit date: 20/01/2017

Neighbour consultation letters sent: 17/01/2017

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

EDF Energy
Environment Agency
Health & Safety Executive
London Fire & Emergency Planning Authority
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

17 St Andrews Close London SE16 3BD	Flat 23 Batwa House SE16 3BF
18 St Andrews Close London SE16 3BD	Flat 24 Batwa House SE16 3BF
15 St Andrews Close London SE16 3BD	60-61 Verney Road London SE16 3DH
16 St Andrews Close London SE16 3BD	Flat 40 Batwa House SE16 3BF
19 St Andrews Close London SE16 3BD	Flat 41 Batwa House SE16 3BF
3 Turnberry Close London SE16 3BE	West Newton House SE16 3DA
4 Turnberry Close London SE16 3BE	Flat 39 Batwa House SE16 3BF
1 Turnberry Close London SE16 3BE	Flat 42 Batwa House SE16 3BF
2 Turnberry Close London SE16 3BE	Flat 45 Batwa House SE16 3BF
14 St Andrews Close London SE16 3BD	62 Verney Road London SE16 3DA
7 St Andrews Close London SE16 3BD	Flat 43 Batwa House SE16 3BF
8 St Andrews Close London SE16 3BD	Flat 44 Batwa House SE16 3BF
5 St Andrews Close London SE16 3BD	103 Crown Place Apartments 20 Varcoe Road SE16 3AD
6 St Andrews Close London SE16 3BD	104 Crown Place Apartments 20 Varcoe Road SE16 3AD
9 St Andrews Close London SE16 3BD	101 Crown Place Apartments 20 Varcoe Road SE16 3AD
12 St Andrews Close London SE16 3BD	102 Crown Place Apartments 20 Varcoe Road SE16 3AD
13 St Andrews Close London SE16 3BD	105 Crown Place Apartments 20 Varcoe Road SE16 3AD
10 St Andrews Close London SE16 3BD	204 Crown Place Apartments 20 Varcoe Road SE16 3AD
11 St Andrews Close London SE16 3BD	205 Crown Place Apartments 20 Varcoe Road SE16 3AD
5 Turnberry Close London SE16 3BE	202 Crown Place Apartments 20 Varcoe Road SE16 3AD
2 Muirfield Close London SE16 3BG	203 Crown Place Apartments 20 Varcoe Road SE16 3AD
3 Muirfield Close London SE16 3BG	58 Verney Road London SE16 3DH
16 Turnberry Close London SE16 3BE	42 Verney Road London SE16 3DH
1 Muirfield Close London SE16 3BG	68 Verney Road London SE16 3DH
4 Muirfield Close London SE16 3BG	106 Crown Place Apartments 20 Varcoe Road SE16 3AD

7 Muirfield Close London SE16 3BG
8 Muirfield Close London SE16 3BG
5 Muirfield Close London SE16 3BG
6 Muirfield Close London SE16 3BG
15 Turnberry Close London SE16 3BE
8 Turnberry Close London SE16 3BE
9 Turnberry Close London SE16 3BE
6 Turnberry Close London SE16 3BE
7 Turnberry Close London SE16 3BE
10 Turnberry Close London SE16 3BE
13 Turnberry Close London SE16 3BE
14 Turnberry Close London SE16 3BE
11 Turnberry Close London SE16 3BE
12 Turnberry Close London SE16 3BE
Flat 6 1 Barkworth Road SE16 3BY
109 Verney Road London SE16 3DA
Flat 4 1 Barkworth Road SE16 3BY
Flat 5 1 Barkworth Road SE16 3BY
111 Verney Road London SE16 3DA
Flat 2 101 Verney Road SE16 3DA
Flat 3 101 Verney Road SE16 3DA
113 Verney Road London SE16 3DA
Flat 1 101 Verney Road SE16 3DA
Flat 3 1 Barkworth Road SE16 3BY
Flat 3 43 Credon Road SE16 3AA
Flat 4 43 Credon Road SE16 3AA
Flat 1 43 Credon Road SE16 3AA
Flat 2 43 Credon Road SE16 3AA
41 Credon Road London SE16 3AA
Flat 1 1 Barkworth Road SE16 3BY
Flat 2 1 Barkworth Road SE16 3BY
45 Credon Road London SE16 3AA
3 Barkworth Road London SE16 3BY
Flat 4 101 Verney Road SE16 3DA
7 Ryder Drive London SE16 3BB
8 Ryder Drive London SE16 3BB
5 Ryder Drive London SE16 3BB
6 Ryder Drive London SE16 3BB
9 Ryder Drive London SE16 3BB
3 St Andrews Close London SE16 3BD
4 St Andrews Close London SE16 3BD
1 St Andrews Close London SE16 3BD
2 St Andrews Close London SE16 3BD
4 Ryder Drive London SE16 3BB
103 Verney Road London SE16 3DA
80 Verney Road London SE16 3DB
Flat 5 101 Verney Road SE16 3DA
Flat 6 101 Verney Road SE16 3DA
Flat 1 Arundel Court SE16 3DB
2 Ryder Drive London SE16 3BB
3 Ryder Drive London SE16 3BB
64 Verney Road London SE16 3DH
1 Ryder Drive London SE16 3BB
9 Muirfield Close London SE16 3BG
Flat 26 Arundel Court SE16 3DB
Flat 27 Arundel Court SE16 3DB
Flat 24 Arundel Court SE16 3DB
Flat 25 Arundel Court SE16 3DB
Flat 28 Arundel Court SE16 3DB
Flat 31 Arundel Court SE16 3DB
Flat 32 Arundel Court SE16 3DB
Flat 29 Arundel Court SE16 3DB
Flat 30 Arundel Court SE16 3DB
Flat 23 Arundel Court SE16 3DB
Flat 16 Arundel Court SE16 3DB
Flat 17 Arundel Court SE16 3DB
Flat 14 Arundel Court SE16 3DB
Flat 15 Arundel Court SE16 3DB
Flat 18 Arundel Court SE16 3DB
Flat 21 Arundel Court SE16 3DB
Flat 22 Arundel Court SE16 3DB
Flat 19 Arundel Court SE16 3DB
Flat 20 Arundel Court SE16 3DB
Flat 33 Arundel Court SE16 3DB
Unit 59 42-72 Verney Road SE16 3DH
38-40 Verney Road London SE16 3DH
34-36 Verney Road London SE16 3DH
Flat 36 Arundel Court SE16 3DB
Flat 37 Arundel Court SE16 3DB
201 Crown Place Apartments 20 Varcoe Road SE16 3AD
10 Varcoe Road London SE16 3DG
107 Crown Place Apartments 20 Varcoe Road SE16 3AD
108 Crown Place Apartments 20 Varcoe Road SE16 3AD
206 Crown Place Apartments 20 Varcoe Road SE16 3AD
309 Crown Place Apartments 20 Varcoe Road SE16 3AD
401 Crown Place Apartments 20 Varcoe Road SE16 3AD
307 Crown Place Apartments 20 Varcoe Road SE16 3AD
308 Crown Place Apartments 20 Varcoe Road SE16 3AD
402 Crown Place Apartments 20 Varcoe Road SE16 3AD
405 Crown Place Apartments 20 Varcoe Road SE16 3AD
406 Crown Place Apartments 20 Varcoe Road SE16 3AD
403 Crown Place Apartments 20 Varcoe Road SE16 3AD
404 Crown Place Apartments 20 Varcoe Road SE16 3AD
306 Crown Place Apartments 20 Varcoe Road SE16 3AD
209 Crown Place Apartments 20 Varcoe Road SE16 3AD
210 Crown Place Apartments 20 Varcoe Road SE16 3AD
207 Crown Place Apartments 20 Varcoe Road SE16 3AD
208 Crown Place Apartments 20 Varcoe Road SE16 3AD
301 Crown Place Apartments 20 Varcoe Road SE16 3AD
304 Crown Place Apartments 20 Varcoe Road SE16 3AD
305 Crown Place Apartments 20 Varcoe Road SE16 3AD
302 Crown Place Apartments 20 Varcoe Road SE16 3AD
303 Crown Place Apartments 20 Varcoe Road SE16 3AD
Flat 27 Batwa House SE16 3BF
Flat 6 8 Varcoe Road SE16 3DG
Flat 7 8 Varcoe Road SE16 3DG
Flat 4 8 Varcoe Road SE16 3DG
Flat 5 8 Varcoe Road SE16 3DG
Flat 8 8 Varcoe Road SE16 3DG
70-72 Verney Road London SE16 3DH
Flat 1 11 Barkworth Road SE16 3BY
Flat 9 8 Varcoe Road SE16 3DG
Flat 3 8 Varcoe Road SE16 3DG
Flat 6 6 Varcoe Road SE16 3DG
Flat 7 6 Varcoe Road SE16 3DG
Flat 4 6 Varcoe Road SE16 3DG
Flat 5 6 Varcoe Road SE16 3DG
Flat 8 6 Varcoe Road SE16 3DG
Flat 1 8 Varcoe Road SE16 3DG
Flat 2 8 Varcoe Road SE16 3DG
Flat 9 6 Varcoe Road SE16 3DG
2 Varcoe Road London SE16 3DG
74 Varcoe Road London SE16 3DG
76 Varcoe Road London SE16 3DG
6 Eagle Close London SE16 3DJ
7 Eagle Close London SE16 3DJ
Flat 1 4 Eagle Close SE16 3DJ
Flat 4 4 Eagle Close SE16 3DJ
Flat 5 4 Eagle Close SE16 3DJ
Flat 2 4 Eagle Close SE16 3DJ
Flat 3 4 Eagle Close SE16 3DJ
5 Eagle Close London SE16 3DJ
66 Verney Road London SE16 3DH
42 Credon Road London SE16 3AB
Allard House 18 Verney Road SE16 3DH
32 Verney Road London SE16 3DH
44 Credon Road London SE16 3AB
50 Credon Road London SE16 3AB
52 Credon Road London SE16 3AB
46 Credon Road London SE16 3AB
48 Credon Road London SE16 3AB
Flat 2 Batwa House SE16 3BA
Flat 20 Batwa House SE16 3BA
Flat 38 Batwa House SE16 3BF
Flat 21 Batwa House SE16 3BA
Flat 5 Batwa House SE16 3BA
Flat 6 Batwa House SE16 3BA
Flat 3 Batwa House SE16 3BA
Flat 4 Batwa House SE16 3BA
Flat 37 Batwa House SE16 3BF
Flat 30 Batwa House SE16 3BF
Flat 31 Batwa House SE16 3BF
Flat 28 Batwa House SE16 3BF
Flat 29 Batwa House SE16 3BF
Flat 32 Batwa House SE16 3BF
Flat 35 Batwa House SE16 3BF
Flat 36 Batwa House SE16 3BF
Flat 33 Batwa House SE16 3BF

Flat 34 Arundel Court SE16 3DB
Flat 35 Arundel Court SE16 3DB
Flat 38 Arundel Court SE16 3DB
Part First Floor Credon House SE16 3DA
Second Floor Credon House SE16 3DA
Flat 39 Arundel Court SE16 3DB
Flat 40 Arundel Court SE16 3DB
1 Varcoe Road London SE16 3DG
Flat 2 11 Barkworth Road SE16 3BY
12 Ryder Drive London SE16 3BB
17 Turnberry Close London SE16 3BE
Flat 3 11 Barkworth Road SE16 3BY
9a Barkworth Road London SE16 3BY
5 Barkworth Road London SE16 3BY
Flat 4 11 Barkworth Road SE16 3BY
Flat 5 11 Barkworth Road SE16 3BY
11 Ryder Drive London SE16 3BB
12 Muirfield Close London SE16 3BG
13 Muirfield Close London SE16 3BG
10 Muirfield Close London SE16 3BG
11 Muirfield Close London SE16 3BG
14 Muirfield Close London SE16 3BG
17 Muirfield Close London SE16 3BG
10 Ryder Drive London SE16 3BB
15 Muirfield Close London SE16 3BG
16 Muirfield Close London SE16 3BG
Flat 1 7 Barkworth Road SE16 3BY

Flat 7 Arundel Court SE16 3DB
Flat 8 Arundel Court SE16 3DB
Flat 5 Arundel Court SE16 3DB
Flat 6 Arundel Court SE16 3DB
Flat 9 Arundel Court SE16 3DB
Flat 12 Arundel Court SE16 3DB
Flat 13 Arundel Court SE16 3DB
Flat 10 Arundel Court SE16 3DB
Flat 11 Arundel Court SE16 3DB
Flat 4 Arundel Court SE16 3DB
9 Barkworth Road London SE16 3BY
105 Verney Road London SE16 3DA
Flat 2 7 Barkworth Road SE16 3BY
Flat 3 7 Barkworth Road SE16 3BY
107 Verney Road London SE16 3DA
Flat 2 Arundel Court SE16 3DB
Flat 3 Arundel Court SE16 3DB
105a Verney Road London SE16 3DA
107a Verney Road London SE16 3DA
Flat 6 4 Eagle Close SE16 3DJ
G07 Crown Place Apartments SE16 3AD
G08 Crown Place Apartments SE16 3AD
G05 Crown Place Apartments SE16 3AD
G06 Crown Place Apartments SE16 3AD
G09 Crown Place Apartments SE16 3AD
211 Crown Place Apartments 20 Varcoe Road SE16 3AD
G10 Crown Place Apartments SE16 3AD
G04 Crown Place Apartments SE16 3AD
409 Crown Place Apartments 20 Varcoe Road SE16 3AD
410 Crown Place Apartments 20 Varcoe Road SE16 3AD
407 Crown Place Apartments 20 Varcoe Road SE16 3AD
408 Crown Place Apartments 20 Varcoe Road SE16 3AD
501 Crown Place Apartments 20 Varcoe Road SE16 3AD
G02 Crown Place Apartments SE16 3AD
G03 Crown Place Apartments SE16 3AD
502 Crown Place Apartments 20 Varcoe Road SE16 3AD
G01 Crown Place Apartments SE16 3AD
East Newton House SE16 3DA
Flat 1 Batwa House SE16 3BF
Ground Floor And Part First Floor Credon House SE16 3DA
32-40 Verney Road London SE16 3DH
Flat 22 Batwa House SE16 3BF
Flat 25 Batwa House SE16 3BF
Flat 26 Batwa House SE16 3BF

Flat 34 Batwa House SE16 3BF
Flat 7 Batwa House SE16 3BA
Flat 25 Batwa House SE16 3BF
Flat 18 Batwa House SE16 3BA
Flat 19 Batwa House SE16 3BA
Flat 2 6 Varcoe Road SE16 3DG
Flat 3 6 Varcoe Road SE16 3DG
Flat 1 6 Varcoe Road SE16 3DG
Flat 17 Batwa House SE16 3BA
Flat 10 Batwa House SE16 3BA
Flat 11 Batwa House SE16 3BA
Flat 8 Batwa House SE16 3BA
Flat 9 Batwa House SE16 3BA
Flat 12 Batwa House SE16 3BA
Flat 15 Batwa House SE16 3BA
Flat 16 Batwa House SE16 3BA
Flat 13 Batwa House SE16 3BA
Flat 14 Batwa House SE16 3BA
Varcoe Road London SE16 3DG
Varcoe Road London SE16 3DG
62 Verney Road London SE16 3DA
60-61 Verney Road London SE16 3DH
Unit 59 41-72 Verney Road SE16 3DH
66 Verney Road London SE16 3DH
Batwa House Varcoe Road SE16 3BF
Unit 401, Crown Place 20 Varcoe Rd SE16 3AD
Unit 406, Crown Place Apartments, 20 Varcoe Road London SE16 3AD

House Of Commons London SW1A 0AA

46-50 Verney Road London SE16 3DH
52-56 Verney Road London SE16 3DH
55 Spring Gardens Manchester M2 2BY
By Email
By Email

Flat 30 Lock House Tavern Quay, Rope Street SE16 7FB
51 Great Malborough Street W1F 7JT

Re-consultation: 21/06/2017

Consultation responses received

Internal services

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

Statutory and non-statutory organisations

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

Neighbours and local groups

Batwa House Varcoe Road SE16 3BF
Batwa House Varcoe Road SE16 3BF
Batwa House Varcoe Road SE16 3BF
By Email
By Email
Email representation
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Flat 28 Batwa House SE16 3BF
Flat 28 Batwa House SE16 3BF
Flat 28 Batwa House SE16 3BF

Flat 30 Lock House Tavern Quay, Rope Street SE16 7FB
Flat 30 Lock House Tavern Quay, Rope Street SE16 7FB
Flat 32 Batwa House SE16 3BF
Flat 40 Batwa House SE16 3BF
Flat 40 Batwa House SE16 3BF
Flat 41 Batwa House SE16 3BF
Flat 41 Batwa House SE16 3BF
Flat 44 Batwa House SE16 3BF
Flat 6 6 Varcoe Road SE16 3DG
G03 Crown Place Apartments SE16 3AD
House Of Commons London SW1A 0AA
Unit 401, Crown Place 20 Varcoe Rd SE16 3AD
Unit 406, Crown Place Apartments, 20 Varcoe Road London SE16 3AD
105 Crown Place Apartments 20 Varcoe Road SE16 3AD
404 Crown Place Apartments 20 Varcoe Road SE16 3AD
407 Crown Place Apartments 20 Varcoe Road SE16 3AD
51 Great Malborough Street W1F 7JT