

<b>Item No.</b> 10.2	<b>Classification:</b> Open	<b>Date:</b> 19 September 2017	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Council's own development Application 17/AP/0964 for: Full Planning Application  <b>Address:</b> BRAGANZA STREET WORKSHOP 42 BRAGANZA STREET AND LAND ADJACENT TO 26 BRAGANZA STREET, LONDON SE17 3RJ  <b>Proposal:</b> Demolition of existing buildings and erection of 5 new blocks, ranging from 3 to 5 storeys in height comprising 33 new homes (5 x intermediate and 28 x private)(Use Class C3) and one new 3 storey block comprising 428sqm of workspace (Use Class B1) with associated landscaping, disabled car parking, cycle parking and public realm works.		
<b>Ward(s) or groups affected:</b>	Newington		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 07/04/2017		<b>Application Expiry Date</b> 07/07/2017	
<b>Earliest Decision Date</b> 12/05/2017			

## RECOMMENDATIONS

1.
  - a) That planning permission be GRANTED subject to conditions, and the applicant entering into an appropriate legal agreement.
  - b) That in the event that the requirements of (a) are not met by 31<sup>st</sup> January 2018, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 141.

## BACKGROUND INFORMATION

2. This proposal forms part of Southwark council's home building programme where the ambition is to deliver 11,000 new council homes by 2043 and the first 1,500 by 2018. The programme is seeking to deliver homes through a combination of in-fill development and development on land owned by the council as well as making use of under-used or vacant sites. There will be a mix of affordable rent, intermediate and private sale homes across the whole project.

### Site location and description

3. The site, which has two distinct parts, measures 0.34 hectares. The main part at no. 42 Braganza Street comprises three buildings set around a central courtyard located behind the street frontage. It contains single and two-storey workshop buildings providing office and workshop space (Class B1), and a former conference hall which also faces onto Doddington Grove.



*The vehicle entrance into the site, with Keyworth Primary School beyond*

4. The smaller part of the application site is to the east of no. 26 Braganza Street at the junction with Gaza Street and provides 8 private parking spaces.



*Smaller part of the application site*

5. The site is within a mainly residential area, with two- and three-storey terraced houses along Braganza Street and mature street trees. The Army Reserves centre and Walworth Garden Farm are to the north-east. To the east and south-east is the Doddington Estate, with the five-storey Arnold House, Burns House and Colet House.
6. To the south and south-west of the application site are the two-storey houses on Doddington Grove, and the four-storey Victorian Keyworth Primary School with its playgrounds and new two-storey school building under construction between Gaza Street and Sharsted Street. To the west and north-west are the three-storey Royal British Legion building, two-storey Sumner Road Chapel Nursery (with outdoor play area), and the two- and three-storey houses along Sharsted Street.
7. The terrace of nos. 46-54 Braganza Street which adjoins the site is grade II listed.

Kennington Underground station and the terraced properties fronting Kennington Park Road are also grade II listed and within the Kennington Park Road Conservation Area.

8. The site is highly accessible by public transport, having a PTAL rating of 6a. Kennington Underground station is 150m to the north-west, with the bus services and cycle superhighway along Kennington Park Road. There is a cycle docking station on Doddington Grove. The site is within the urban density zone, flood zone 3, the air quality management area and a controlled parking zone. It is not within a conservation area, archaeological priority area, nor town centre, and there are no Tree Preservation Orders on the site nor nearby sites.

### Details of proposal

9. The proposal seeks to redevelop the site to provide 33 residential units in a mixture of flats, maisonettes and houses contained in five blocks of between three- and five-storeys. A sixth block would provide Class B1 floorspace over three-storeys. Four of the five blocks on the main part of the site would be set around a central garden courtyard that would include paving, planting, trees, seating and play equipment, with the vehicle access retained onto Braganza Street, and a new pedestrian entrance proposed onto Doddington Grove.
10. This application is part of the Southwark Regeneration in Partnership Programme (SRPP), which together with other programmes within the Council seek to deliver more affordable housing within the borough. The proposed housing mix is 5 x intermediate tenure and 28 x private tenure housing.
11. The scheme has been designed by Adam Khan Architects, and the landscaping by Levitt Bernstein.
12. The drawing below shows the location of proposed blocks A to F on the site.



13. The blocks would provide the following number, mix and tenure of units, in buildings of between three- and five-storeys as set out in the table below:

Block	Height(s)	Number of units	Mix	Tenure
A	3-storeys	3	1 x 2-bedroom maisonette 1 x 3-bedroom maisonette 1 x 3-bedroom house	All private
B	3- to 4-storeys	12	4 x 2-bedroom maisonettes 2 x 3-bedroom maisonettes 6 x 1-bedroom flats	All private
C	3- to 5-storeys	9	1 x studio 4 x 1-bedroom flats 1 x 2-bedroom maisonettes 3 x 3-bedroom maisonettes	5 x intermediate (4 x maisonettes and 1 x 1-bedroom flat) 4 x private
D	3-storeys	3	3 x 4-bedroom houses	All private
E	3-storeys	6	4 x 2-bedroom maisonettes 2 x 2-bedroom flats	All private
F	3-storeys	428sqm (GIA) B1	n/a	n/a

14. All blocks would be constructed in brickwork, with pre-cast concrete copings, coloured render to the recessed balconies, and PPC finish aluminium windows, entrance doors and balcony railings. All units would have private amenity space; the ground floor units would have private gardens, and the upper units would have balconies or roof terraces.
15. Six wheelchair adaptable units are proposed and three wheelchair car parking spaces near to the Braganza Street entrance to the site. The houses in Blocks A and E would have their own individual bin and cycle stores, while the other blocks would have a communal refuse storage in Block F and cycle stores within the blocks and gardens of the duplexes.
16. Block F would provide 428sqm GIA office floorspace (Class B1) in a three-storey building, with a pitched roof. The submitted floorplan show how this building could be subdivided into 8 smaller units or 3 larger units as this building would be fitted out to shell and core level only in order to provide flexibility for future occupiers. It would have ground floor cycle and refuse storage.
17. There is a concurrent planning application for the redevelopment of 161-179 Manor Place (ref. 17/AP/0907) which is 120m to the east of the Braganza Street site. The applications are linked in terms of wheelchair housing provision and affordable housing provision. The sites are in close proximity to each other and will come forward together with the same development partner. The Braganza Street application proposes only 15% affordable housing provision (as intermediate tenure) and so relies on the over-provision in the Manor Place scheme to achieve a policy compliant affordable housing provision across the two schemes. The Braganza Street proposal includes an additional 3 wheelchair adaptable units to make up for the shortfall within the Manor Place scheme.

### Amendments

18. As the proposal does not provide sufficient space for a refuse vehicle to turn around within the site, the proposed ground floor plan was amended to provide a holding area for the bins, located near the vehicle entrance on Braganza Street.
19. An updated flood risk assessment and drainage strategy were provided following consultation feedback. An updated daylight and sunlight report was provided to

address officer comments.

20. Drawings were reprovided that corrected minor errors in the drawing titles, but did not change the form or design of the proposed scheme.

### Planning history

21.

09/EQ/0150 Application type: Pre-Application Enquiry (ENQ) Mixed range of residential accommodation from 1 bed supported housing units to 4 bed town houses in four blocks located respectively in Braganza Street and Doddington Grove with blocks 2 and 3 forming a mews type development at the heart of the site Decision date 21/10/2009 Decision: Pre-application enquiry closed (EQC)
10/EQ/0131 Application type: Pre-Application Enquiry (ENQ) Construction of 28 dwellings and new access road from Doddington Grove. The development will consist of 7 no 1/2 bed and 21 3/4 bed houses Decision date 05/05/2011 Decision: Pre-application enquiry closed (EQC)
12/EQ/0207 Application type: Pre-Application Enquiry (ENQ) Demolition of existing workshops and erection of new housing development to provide 20 houses and 4 flats (details of design). Decision date 22/01/2013 Decision: Pre-application enquiry closed (EQC)
15/EQ/0386 Application type: Pre-Application Enquiry (ENQ) Mixed-use scheme including 33 new residential units and reprovided B1 commercial units Decision date 22/01/2016 Decision: Pre-application enquiry closed (EQC)

### Planning history of adjoining sites

22. Keyworth Primary School

15/AP/2963 – Planning permission granted for demolition of the existing dining hall and the erection of a new two storey detached school building to accommodate nine new classrooms, double height hall and kitchen, associated landscaping and re-planting are also proposed. Re-submission of application 14/AP/4715 with additional information on sustainability (decision dated 4/9/15). Under construction.

14/AP/4715 – Planning permission granted for demolition of the existing dining hall and the erection of a new two storey detached school building to accommodate nine new class rooms, double height hall and kitchen; associated landscaping and re-planting are also proposed (decision dated 28/4/15).

14/AP/1371 – Temporary planning permission granted for erection of a new temporary modular classroom block with disabled W/C, pupil W/C and store with new disabled access ramp (decision dated 25/6/14).

### KEY ISSUES FOR CONSIDERATION

#### Summary of main issues

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

- a) Principle of demolition and land uses
- b) Environmental Impact Assessment
- c) Design (including layout, scale, heights and landscaping)
- d) Heritage impacts including on the setting of nearby listed buildings
- e) Density
- f) Affordable housing
- g) Housing quality and mix
- h) Impact of on the amenity of occupiers of neighbouring properties
- i) Transportation and highways
- j) Trees and ecology
- k) Sustainability (including energy, flood risk, and contamination)
- l) Planning obligations and Community Infrastructure Levy (CIL)

## **Planning policy**

24. The statutory developments plans for the Borough comprise the National Planning Policy Framework 2012, London Plan 2016, Southwark Core Strategy 2011, and saved policies from the Southwark Plan (2007).

25. National Planning Policy Framework 2012

Section 1: Building a strong, competitive economy

Section 4: Promoting sustainable transport

Section 6: Delivering a wide choice of high quality homes

Section 7: Requiring good design

Section 8: Promoting healthy communities

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

Section 11: Conserving and enhancing the natural environment

Section 12: Conserving and enhancing the historic environment.

26. The London Plan 2016

Policy 3.3 Increasing housing supply

Policy 3.4 Optimising housing potential

Policy 3.5 Quality and design of housing developments

Policy 3.6 Children and young people's play and informal recreation facilities

Policy 3.8 Housing choice

Policy 3.9 Mixed and balanced communities

Policy 3.10 Definition of affordable housing

Policy 3.11 Affordable housing targets

Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes

Policy 3.13 Affordable housing thresholds

Policy 4.2 Offices

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.7 Renewable energy

Policy 5.9 Overheating and cooling

Policy 5.10 Urban greening

Policy 5.11 Green roofs and development site environs

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage

Policy 5.14 Water quality and waste water infrastructure

Policy 5.15 Water use and supplies

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.5 Funding Crossrail and other strategically important transport infrastructure

Policy 6.9 Cycling

Policy 6.10 Walking  
Policy 6.13 Parking  
Policy 7.1 Lifetime neighbourhoods  
Policy 7.2 An inclusive environment  
Policy 7.3 Designing out crime  
Policy 7.4 Local character  
Policy 7.5 Public realm  
Policy 7.6 Architecture  
Policy 7.8 Heritage assets and archaeology  
Policy 7.14 Improving air quality  
Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes  
Policy 7.19 Biodiversity and access to nature  
Policy 7.21 Trees and woodlands  
Policy 8.2 Planning obligations  
Policy 8.3 Community Infrastructure Levy.

27. Greater London Authority Supplementary Guidance

Housing SPG (March 2016)  
Play and Informal Recreation SPG (September 2012)  
Sustainable Design and Construction SPG (April 2014).

28. Core Strategy 2011

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

29. 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 NPPF. 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.

Policy 1.4 Employment Sites Outside the Preferred Office Locations and Preferred Industrial Locations  
Policy 1.5 Small Business Units  
Policy 2.5 Planning Obligations  
Policy 3.1 Environmental Effects  
Policy 3.2 Protection of Amenity  
Policy 3.3 Sustainability Assessment  
Policy 3.4 Energy Efficiency  
Policy 3.6 Air Quality  
Policy 3.7 Waste Reduction  
Policy 3.9 Water

Policy 3.11 Efficient Use of Land  
Policy 3.12 Quality in Design  
Policy 3.13 Urban Design  
Policy 3.14 Designing Out Crime  
Policy 3.15 Conservation of the Historic Environment  
Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites  
Policy 3.28 Biodiversity  
Policy 4.2 Quality of residential accommodation  
Policy 4.3 Mix of Dwellings  
Policy 4.4 Affordable Housing  
Policy 4.5 Wheelchair Affordable Housing  
Policy 5.1 Locating Developments  
Policy 5.2 Transport Impacts  
Policy 5.3 Walking and Cycling  
Policy 5.6 Car Parking  
Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired.

30. Southwark Supplementary Planning Documents

2015 Technical Update to the council's Residential Design Standards (SPD, 2011)  
Design and Access Statements (SPD, 2007)  
Development Viability (SPD, 2016)  
Draft Affordable Housing SPD (2011)  
Sustainable Design and Construction (SPD, 2009)  
Sustainable Transport (SPD, 2010)  
Section 106 Planning Obligations and CIL (SPD, 2015)  
Sustainability Assessment (SPD, 2009).

**Principle of demolition and land uses**

31. Core Strategy policy 10 “Jobs and businesses” seeks to increase the number of jobs in the borough, and protects business floorspace in certain areas (the Central Activities Zone, town and local centres, strategic cultural areas, action area cores, on classified roads and within Preferred Industrial Locations). Southwark Plan policy 1.4 “Employment sites outside the Preferred Office Locations and Preferred Industrial Locations” of the Southwark Plan protects established Class B use where the site meets the same criteria as Core Strategy policy 10. Southwark Plan policy 1.5 “Small business units” encourages the re-provision of small units in the redevelopment of employment sites.
32. The Kennington Enterprise Centre on the site currently contains Class B1 commercial space totalling 2030sqm internal area, but due to the vacant units and short term tenants only 350sqm is occupied by long-term tenants. The demolition would be a loss of Class B1 commercial floorspace, and the proposed office floorspace proposed in the application results in an overall reduction of 1,600sqm. The applicant has sought to provide a similar area of Class B1 in Block F to that currently occupied by long-term tenants, and has stated that all the tenants will be given the right to return, and efforts would be made to relocate the charity organisations.
33. As the site is not on a classified road, is not in a designated Preferred Industrial Location, the Central Activities Zone, town or local centre, nor action area core, it does not meet any of the criteria of policies 1.4 of the Southwark Plan nor Core Strategy policy 10; therefore there is no policy protection for the existing commercial uses. While not required by planning policies, the proposed Class B1 floorspace within Block F (428sqm GIA providing 323sqm net internal area of workspace) is welcomed, and would be flexible to allow subdivision by floor or divided further to



provided smaller units, as encouraged by Southwark Plan policy 1.5. Being of lesser quantum than the existing floorspace in this out of town centre location, the proposed floorspace would not cause harm to the vitality and viability of the designated town centres and local centres. The quality of the proposed workspace is acceptable with good daylight provision and outlook.

34. The site next to 26 Braganza Street has no open space designation and is currently used for private parking with each space secured by a locked chain and posts. There is no policy protection for private parking, and so no in principle objection to its loss.
35. The buildings within the site are of limited architectural or historic merit and no objection is raised to their demolition.
36. The redevelopment of both parts of the site for housing would contribute towards the borough's housing targets, and as one of the Southwark Regeneration in Partnership Programme sites, the scheme would assist the council in providing new housing and new affordable housing. Given the residential character of the area, the redevelopment of the site for residential use is acceptable in principle, and would accord with London Plan policy 3.3 "Increasing housing supply" and Core Strategy policy 5 "Providing new homes".

### **Environmental impact assessment**

37. The scale of development proposed here does not reach the minimum thresholds established in the Town and Country Planning (Environmental Impact Assessment) Regulations 2015 that would otherwise trigger the need for an environmental impact assessment. The proposal's location and nature do not give rise to significant environmental impacts in this urban setting, nor when the cumulative impacts are considered with other developments in the area, and an EIA is not required.

### **Design (including layout, scale, height and landscaping)**

38. Core Strategy policy 12 "Design and conservation" requires development 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. Policies 3.12 "Quality in design" and 3.13 "Urban design" of the Southwark Plan seek a high quality of architectural and urban design, and policy 3.14 "Designing out crime" states that development should be designed to improve community safety and crime prevention. The architects have sought to achieve a small-scale cohesive character across the proposal which responds to its context and provides high quality, tenure blind housing.

#### Site layout

39. The basic approach and layout of this redevelopment by infilling the Braganza Street and Doddington Grove gaps in the street frontages and creating a backland "mews" on the larger site is supported.
40. Block A would continue the row of terrace housing along the southern side of Braganza Street, although the front building line has been staggered to allow the corner Royal British Legion building to retain its prominence in the street and to allow the large street tree to be retained. Block E would continue the building line and ridge height of Doddington Grove. The layout of these two blocks is acceptable.
41. The layout of the mews site is a pragmatic one based on back-to-back building separation distances with the existing buildings and neighbouring properties. This produces an informal layout of Blocks B, C, D and F which is appropriate for a mews

development. The building-to-building distances within the mews are quite tight, and at 11.8m the separation is just short of the 12m sought by the Residential Design Standards SPD, but appropriate to its mews character. The existing vehicle access would be retained for the wheelchair parking, and a new pedestrian route through the site would be created.

42. The ground floor elevations of the blocks interact well with the public realm. The mews space would be divided into several subsidiary spaces (the entrance way, entrance square, central mews garden space) appropriate to their position within the layout, and with accordingly different landscaping concepts, and this is capable of creating an attractive sequence of spaces and experiences.

#### Scale, height and massing

43. The Design and Access statement states that the “*underlying strategy is to respect the lower scale of surrounding streets and increase the mass of development at the centre of the site whilst breaking down the massing to achieve a more picturesque quality*”. In general, this strategy is successful. The perimeter infill buildings of Blocks A and E are modest and would fit in well with the prevailing townscape in the area.
44. The taller five-storey part of Block C would be set well within the site, reducing its impact on the streetscene, and would not impose itself on the surrounding townscape, whilst the varying heights of the central blocks would produce an attractive “picturesque” quality.



*Visual showing the view from the Braganza Street entrance looking south Block C on the left-hand side, Block B in the centre at the back and Block F at the centre front*



*View of Block A from Braganza Street with the Royal British Legion building beyond*



*View of Block E from the junction of Braganza Street and Doddington Grove*

#### Detailed design

45. A consistent use of materials and architectural language is proposed across the blocks with precast concrete copings (in a Portland Stone colour), grey-brown brickwork in a broken and stretcher bonds, painted aluminium framed windows, steel railings to windows and balconies, painted aluminium doors with precast concrete canopies.



*Detail of a typical elevation*

46. The utilitarian nature of the design concept is appropriate for what might be expected within a backland mews development. However the design is lifted above the ordinary by well considered detailing that extends to the specification of brick bonding patterns, stonework coping, and recessed entrances. The result would be restrained but high quality architecture which demonstrates the craft of building. This aspect is strongly supported. Although very plain, the proposed street buildings are carefully proportioned such that they appear as modernist versions of adjacent Georgian buildings, which is supported.
47. Conditions are recommended requiring the submission of material samples, and listing the detailed drawings provided as approved drawings, in order to ensure that the intended quality is carried through to completion.
48. The scheme would achieve a secured by design silver standard, and may achieve a gold standard now that a gate is proposed to Doddington Grove access. A condition is proposed regarding Secured by Design.

#### Landscaping and public realm

49. The landscaping across the main site would include feature trees and sett paving in the landscaping leading from the shared surface where the parking would be located at the entrance to Braganza Street, to an entrance “square” in front of Block C, through to the central mews courtyard. The pedestrian access to the centre of the site would be located between Block E and no. 10 Doddington Grove. Seating, lighting and play equipment are proposed in the main courtyard area.



*Landscaping masterplan for the site*

50. From the information on the materials, finishes, planting and play equipment included in the design and access statement and drawings, the proposed landscaping is considered to be high quality, accessible and of a suitable scale for the redevelopment to provide amenity for future residents and as a publicly accessible amenity. Further information would be required by a condition.

Conclusion on design

51. The layout, scale, heights and detailed design of the proposed buildings are considered to be appropriate for this site and for the streetscene, with high quality architecture. The quality of the detailed design would be secured by recommended conditions for the materials and detailed drawings. The area of landscaping across the main site and quality of planting, surfacing and play equipment shown are acceptable and would be secured by suggested conditions. The proposal has successfully addressed the design policies 7.3, 7.4, 7.5 and 7.6 of the London Plan, policy 12 of the Core Strategy and 3.12, 3.13 and 3.14 of the Southwark Plan.

**Heritage impacts including on the setting of nearby listed buildings**

52. The site is adjacent to and behind nos. 46-54 Braganza Street which are attractive grade II listed Georgian buildings, and the impact upon the setting of these listed buildings is a statutory consideration.
53. In considering the impact of a proposal on a heritage asset such as a listed building, the local planning authority must have regard to planning legislation in its determination of a planning application. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses. In this context, "preserving", means doing no harm.
54. The National Planning Policy Framework states at paragraph 131 that in determining a planning application, the local planning authority should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
55. Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Similarly Southwark Plan policy 3.15 "Conservation of the historic environment" requires development to preserve or enhance the special interest or historic character or appearance of buildings and areas of historical or architectural significance, and this is repeated in Core Strategy policy 12. Policy 3.18 "Setting of listed buildings, conservation areas and world heritage sites" states that permission will not be granted for developments that would not preserve or enhance the immediate or wider setting of a listed building, and important view of a listed building or the setting of a conservation area.
56. The existing workshop buildings do not positively contribute to the setting of the listed buildings. The proposed development takes cues from the listed Georgian terrace with its tall vertical windows of varied heights, front doors with large windows on the ground floor, quiet brickwork and light coloured decorative elements. The townscape assessment within the Design and Access Statement includes three visuals to show the proposed views along Braganza Street, looking from the entrance to the main part of the site, from the junction of Doddington Grove and Braganza Street, and a view from within the courtyard in the scheme.
57. The material provided with the application demonstrates that the scale and architecture of the proposed scheme is quite "polite" and would preserve the setting of these neighbouring listed buildings. Block C is set reasonably well within the site such that it would not loom or be overbearing on these listed buildings when viewed from the surrounding streets. The proposal is considered to accord with the NPPF by preserving the setting of the grade II listed buildings.
58. The site is not within the GLA viewing corridors or assessment areas. Due to the distance of the application site from the listed Kennington Underground station and the Kennington Park Road conservation area, the proposal would not affect the setting of these heritage assets.
59. The site is not within an archaeological priority zone, and from the records and information available, no further archaeological assessment, fieldwork or conditions are required in consideration of this application. The proposal would comply with the NPPF, 7.4 and 7.8 of the London Plan, Core Strategy policy 12 and policies 3.15 and 3.18 of the Southwark Plan.

## **Density**

60. London Plan policies 3.3 and 3.4 seek to increase housing supply and optimise housing potential through intensification and mixed use redevelopment. Table 3.2 of the London Plan suggests a density range of 200-700 units per hectare for an urban setting with a PTAL rating of 4-6. Core Strategy policy 5 "Providing new homes" sets the expected density range for new residential development across the borough. This site is within the urban density zone, where a density of 200-700 habitable rooms per hectare is anticipated. Southwark Plan policy 3.11 requires developments to ensure they maximise efficient use of land.
61. With a total site area of 3,340sqm and taking into account the commercial space, the

proposal has a density of 392 habitable rooms per hectare. This is in the middle of the 200-700 habitable rooms per hectare range for the urban zone and suggests an acceptable quantum of development is proposed.

### Affordable housing

62. London Plan policy 3.8 states that the provision of affordable family housing should be a strategic priority for borough policies, and policy 3.9 promotes mixed and balanced communities (by tenure and household income). Further detail on the definition of affordable housing, targets, and requiring the maximum reasonable amount of affordable housing on major schemes are included in policies 3.10, 3.11, 3.12, and 3.13 of the London Plan. Core Strategy policy 6 “Homes for people on different incomes” requires as much affordable housing on developments of 10 or more units as is financially viable, and at least 35%. Saved policy 4.4 “Affordable housing” of the Southwark Plan seeks at least 35% of all new housing as affordable within the urban density zone.
63. This scheme will be delivered through the Southwark Regeneration in Partnership Programme whereby a number of sites have been packaged together to be delivered by a development partner. This scheme forms part of Lot A (along with the Manor Place site forming Lot A1) which will be tendered to be on site in early 2018.

Tenure	Intermediate habitable rooms (units)	Private habitable rooms (units)	Total
Studio	0 (0)	1 (1)	1 (1)
1 bedroom	2 (1)	18 (9)	20 (10)
2 bedroom	4 (1)	42 (11)	46 (12)
3 bedroom	15 (3)	15 (3)	30 (6)
4 bedroom	0 (0)	18 (4)	18 (4)
<b>Total habitable rooms (units)</b>	<b>21 (5)</b>	<b>94 (28)</b>	<b>115 (33)</b>

64. Five intermediate tenure units are proposed (1 x 1-bedroom flat, 1 x 2-bedroom maisonette, and 3 x 3-bedroom maisonettes) which is 15% of the number of proposed dwellings. In terms of habitable rooms, the affordable units would contain 21 habitable rooms (representing 18.2% of the habitable rooms). Policy allows for one less affordable habitable room to be required for each affordable unit which complies with the wheelchair design standards (in this case two such units are proposed). Even so, a 23 habitable room provision would be only a 20% affordable provision, and therefore the scheme is not providing a policy compliant affordable housing percentage.
65. The executive summary of the viability assessment shows that the scheme would generate a £7.023m surplus, showing that the scheme could support further affordable housing on-site. However, as mentioned above this application and that at 161-179 Manor Place are submitted to be considered together as linked applications, and form part of the wider SRPP project “lot A” of 8 sites across the north of the borough.
66. The applicant would like this application and the Manor Place planning application ref. 17/AP/0907 to be considered as linked applications. This Braganza Street application proposes 18% intermediate tenure by habitable rooms which is an under-provision of affordable homes. The Manor Place application proposes 53% of the habitable rooms as affordable housing in social rent and intermediate tenures, but also has a surplus of £791,000. The table below sets out the tenure mix for each

application and the cumulative figures. By combining the housing proposed by the two applications, a total of 40.4% affordable provision is proposed in terms of habitable rooms, and 59.6% as private tenure.

<b>Tenure</b>	<b>Social rent habitable rooms (units)</b>	<b>Intermediate rent habitable rooms (units)</b>	<b>Private habitable rooms (units)</b>	<b>Total</b>
Braganza Street	0 (0)	21 (5)	94 (28)	115 (33)
Manor Place	77 (19)	31 (9)	96 (28)	204 (56)
Total habitable rooms (units)	77 (19)	52 (14)	190 (56)	319 (89)
<b>Percentage of total habitable rooms (units)</b>	<b>24.1% (21.3%)</b>	<b>16.3% (15.7%)</b>	<b>59.6% (62.9%)</b>	<b>100% (100%)</b>

67. When taken together, the two schemes would comply with policies by exceeding the minimum 35% affordable housing provision in terms of the number of units and habitable rooms, at 40.4% affordable housing proposed by habitable room, and 37% by units. The affordable housing across the two schemes would be mostly concentrated in one core of the Manor Place site, which assists in managing the affordable housing and keeping the service charge levels low. Focusing most of the affordable housing provision on one site of these two linked applications is considered not to harm the policy aims of creating mixed communities, given the proximity of the two application sites and the varied context around the sites of privately owned properties and council owned housing.
68. The council intends to tender the two sites as a joint bid, and both would be developed by the same developer. Consideration would be given in the drafting of the unilateral undertaking of an appropriate mechanism to ensure the affordable housing within the Manor Place scheme is provided before the Braganza Street site is completed or occupied, to ensure the link between the two sites is maintained through the tendering and build phases; the Braganza Street proposal would not be allowed to go ahead alone without the Manor Place scheme (and its affordable housing) also being built.
69. However, these two schemes also generate a surplus of £7.8m. Instead of using this surplus to provide additional affordable housing on the Braganza Street and/or Manor Place sites, the Council as applicant would use this surplus to fund other SRPP projects that are in deficit. Two SRPP projects have been highlighted for using the surplus - the Albion Primary School residential development under consideration in ref. 17/AP/1234 (shown to be £7.33m in deficit), and the Rotherhithe Civic Centre commercial and residential development proposed in application ref. 17/AP/1255 (shown to be £3.4m in deficit).

These four planning applications for SRPP schemes propose the following percentages of affordable housing (by habitable room): 74% of the 50 units at Albion Primary School (50 units proposed), 100% at the Civic Centre (26 units proposed), 18% at Braganza Street (33 units proposed) and 53% at Manor Place (56 units proposed). When combined these four SRPP applications significantly exceed the 35% minimum affordable housing sought by policy, and as part of the wider SRPP proposals would provide an acceptable level of affordable housing. Also, the eight schemes within the wider SRPP "lot A" aim to deliver a total of 586 units of which 244 units (41%) would be affordable, and require cross-subsidising of the unviable or marginal sites by the more viable ones. For these reasons specific to these schemes as part of the council's wider project, the percentage of affordable housing proposed



within the Braganza Street and Manor Place applications are considered acceptable. It should be noted that the freehold of the various developments within the SRPP programme will be retained by the Council and built out in accordance with development agreement/s at the consented level of affordable housing.

71. Policy 4.4 of the Southwark Plan seeks a 70%/30% split between social rented and intermediate units. This Braganza Street application proposes only intermediate tenure affordable housing. Across the two applications the split of affordable tenure by habitable room is 60% social rent 40% intermediate, implying too much intermediate tenure is proposed. If the “additional” intermediate tenure within the 5.4% affordable provision above the 35% minimum policy requirement is excluded, the schemes would be one social rent habitable room away from achieving the 70%/30% split and so are very close to being policy compliant. The applicant is investigating how social rent provision could be increased on the Manor Place scheme (by changing the tenure of one unit from intermediate to social rent) and an update will be provided on this at the committee meeting. As these two schemes forms part of the wider SRPP project to provide predominantly affordable housing, the tenure split is acceptable in this instance.

### Housing quality and mix

72. London Plan policy 3.5 requires housing developments to be of the highest quality internally, externally and in relation to their context, and policy 3.8 encourages a choice of different sizes and types of dwellings. Policy 4.2 of the Southwark Plan provides guidance on what constitutes good residential development and states that planning permission will be granted for mixed use schemes where they achieve good quality living conditions including high standards of accessibility, privacy and outlook, natural daylight, ventilation, amenity space, safety and security and protection from pollution. The Residential Design Standards and Sustainable Design and Construction SPDs provide detailed guidance. Policy 4.3 of the Southwark Plan and Core Strategy policy 7 set out the preferred housing mix of at least 60% 2 or more bedrooms, and at least 20% 3-, 4- or 5- bedroom units in the urban zone.

#### Mix and unit size

73. This application proposes the following unit size mix:

Unit size	Number of units	Percentage
Studio	1	3%
One bedroom	10	30%
Two bedroom	12	36%
Three bedroom	7	21%
Four bedroom	3	9%
<b>Total</b>	<b>33</b>	<b>100</b>

74. The percentage of studio units (3%), of two-bedrooms or larger (66%), and of three-bedrooms or larger (30%) accord with the policy requirements.
75. All units would meet or exceed the minimum internal size standards for the flats and houses, and wheelchair houses as set out in the Residential Design Standards SPD.

#### Accessibility

76. London Plan policy 3.8 provides specific targets for inclusive accessibility requiring 90% of new housing to meet Building Regulation requirement M4(2) ‘accessible and

adaptable dwellings and 10% should meet Building Regulation requirement M4(3) 'wheelchair user dwellings', that is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The submitted Design and Access Statement describes the considerations that have gone into the access and circulation arrangements and layout of proposal.

77. Two flats can only achieve M4(1) standard as they are on the second floor of Block E (above the maisonettes) where no lift is proposed within this small block. All other units will be built to M4(2) standard and the six wheelchair dwellings will be built to M4(3) in accordance with the Residential Design Guidance SPD and London Plan policy 3.8. By linking this application with the Manor Place proposal, the Braganza Street proposals includes three "additional" wheelchair units to make up for the under-provision on the Manor Place scheme, and ensures that cumulatively the two schemes comply with policy. The Braganza Street site is better able to provide wheelchair units as ground floor units can be provided and on-site parking spaces can be provided, unlike the Manor Place site. The delivery of the units to these accessibility standards would be secured by condition, and the marketing of the intermediate wheelchair units in a planning obligation.
78. The houses and all but one maisonette would have their own ground floor entrance (one maisonette is at second in Block C) and level thresholds would be provided to all buildings, cycle stores and refuse stores. The proposal includes separate kitchen/dining rooms to all larger dwellings, storage accessed from dwelling circulation areas and has sought to maximise the number of living/kitchen/dining rooms fronting onto private amenity areas.
79. In terms of cores, 6 flats in Block B would share a core, seven sharing the core in Block C and two sharing the core in Block E.
80. The arrangement, size and accessibility of the proposed units are acceptable.

#### Daylight and sunlight

81. All habitable rooms in Blocks A, C, D and E would receive good levels and distribution of daylight. In Block B, the five ground floor kitchens to the maisonettes would have ADF values of 1.59% to 1.85% (below the 2% minimum) but good levels of daylight distribution, with the adjoining living rooms and bedrooms on the first floor receiving good daylight levels. The daylight and sunlight levels to the proposed units are considered to be of a good level.
82. All office rooms in Block F would receive good levels and distribution of daylight.

#### Aspect, outlook and privacy

83. All maisonettes, houses and flats would be dual or triple aspect, and none would be solely north facing. Two flats on the second floor of Block B would their secondary aspect provided by windows opening onto the walkway access on the southern side of the block (to give cross-ventilation and sunlight). These windows would have limited privacy however, with the small number of flats using this walkway (three) the amenity of these two flats is considered acceptable.
84. The windows and rear gardens of Blocks A and E are orientated in line with the building lines of Braganza Street and Doddington Grove, and as terraced houses these properties would have an acceptable level of privacy even once the mutual overlooking across the street and from upper level windows are considered.
85. Block B would face onto Blocks C and D across the central part of the site with a

separation distance of 11.8m. This is below the 21m sought between the rear elevations sought by the Residential Design Standards SPD, and below the 12m sought where fronting a highway, however as all units are dual or triple aspect and so benefit from alternative outlooks, the quality of residential accommodation is considered acceptable for future occupiers.

86. The separation distance between flats in the western end of Block B and the offices in Block F would be 8m, however the windows have been arranged to be staggered and not directly face square onto each other. The affected units in Block B would be triple aspect and so would enjoy good outlook.
87. The southern end of Block C would be 8m from Block F, although the windows of block C affected at ground, first and second floors would be hallway/stairwell windows or serve rooms that have a secondary outlook and windows.
88. The proposed residential units are considered to have acceptable levels of privacy and outlook.

#### Amenity space

89. The Residential Design Standards SPD sets the minimum amenity space requirement for new dwellings. All units would have some form of private amenity space. The maisonettes in Block A would have rear gardens and first floor terraces, and the house would have a rear 13sqm garden and a 21sqm roof terrace as well as a front garden area. Due to the location of the house it is not possible to provide it with a 50sqm rear garden at least 10m long; the proposal is considered to strike an appropriate balance between the layout of this terrace in the streetscene while providing a suitable quantum of private amenity space for this three-bedroom house.
90. Two houses in block D would have rear gardens of size and depth greater than the requirements of the SPD; the third house would have a 32sqm rear garden across the width of the house, and a first floor roof terrace of 16sqm. This is below the 50sqm and 10m depth sought by the SPD due to the arrangement of the site at this corner, but is considered a suitable quantum of amenity space especially with the location of the new courtyard in front of the house. The maisonettes in Block E would have private rear gardens of 33-45sqm. These amenity spaces would receive good levels of sunlight and daylight.
91. Ten flats in Blocks B and C and the two flats in Block E would have private amenity space smaller than the 10sqm sought, with a shortfall of 1-5sqm for these studio, one-bedroom and two-bedroom flats. The communal courtyard amenity space would provide more than the minimum needed to address this 54sqm shortfall and the 50sqm communal garden size, so that the scheme would comply with policy.
92. The submitted daylight and sunlight report shows some of the private gardens would receive limited sunlight on 21 March, particularly those to the north of the tall boundary wall with Keyworth School, however the central courtyard would receive good levels of sunlight. All the private gardens would receive much better sunlight levels on 21<sup>st</sup> June, with between 61% and 91% of the private garden areas receiving at least two hours of sunshine.
93. Overall, the quantum and quality of the private and communal amenity space across the scheme is acceptable.

#### Playspace

94. Policy 3.6 of the London Plan and Core Strategy policy 11 part 5 set out the

requirement for children's play. Using the GLA playspace calculator, a total of 70sqm of children's play space would be required (40sqm for under 5 year olds, 20sqm for 5 to 11 years and 10sqm for 12+). Play features for 0-5 year olds would be incorporated within the courtyard area, taking inspiration from the Surrey Zoological Garden which was located nearby, to include a slide, animal "footprints" laid flush with the setts, steel posts to form a "zoo playful cage". This area would be overlooked by the blocks. The drawings submitted showing these details would form part of the approved plans. The shortfall of 30sqm playspace for older children would need to be provided off-site, and funding would be secured through a planning obligation. Subject to this requirement, the proposal would comply with policy.

### **Impact on the amenity of occupiers of neighbouring properties**

95. Policy 3.1 "Environmental effects" of the Southwark Plan seeks to prevent development from causing material adverse effects on the environment and quality of life. Policy 3.2 "Impact on amenity" of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Similarly Core Strategy policy 13 "High environmental standards" seeks to avoid amenity and environmental problems.

#### Daylight and sunlight

96. A daylight, sunlight and overshadowing analysis has been provided with the application to demonstrate the impact of the proposed blocks on surrounding properties. This analysis was undertaken in accordance with the Building Research Establishment's 2011 guidelines, and considered the windows, gardens and playgrounds of following properties:

- 26 Braganza Street
- Royal British Legion building (34 Braganza Street)
- 1 Gaza Street (a children's nursery)
- 46-62 Braganza Street (no. 46, 48, 50, 52, 54, 56, 58, 60 and 62)
- 15-27 Braganza Street (no. 15, 17, 19, 21, 23, 25 and 27)
- 1-39 Doddington Grove (Arnold House)
- 10-20 Doddington Grove (no. 10, 12, 14, 16, 18 and 20)
- Keyworth Primary School (Victorian building)
- Keyworth Primary School's new building on Gaza Street

97. Three BRE tests were applied to the windows and assumed room arrangements of these properties; the vertical sky component (VSC), the no sky line (NSL) and annual probable sunlight hours (APSH). The overshadowing of the neighbouring garden areas were considered for 21 March and 21 June.

#### Assessment of daylight and sunlight impacts

98. The tables below summarise the results of the daylight (VSC and NSL) tests:

### **Daylight impacts to windows – Vertical Sky Component**

Address	Number of windows assessed	Passes VSC test	Fails the VSC test
26 Braganza Street	5	5 (100%)	0
Royal British Legion building (34 Braganza Street)	15	15 (100%)	0
1 Gaza Street	31	30 (97%)	1 (3%)
15-27 Braganza Street	65	50 (77%)	15 (23%)
46-62 Braganza Street	61	61 (100%)	0
1-39 Doddington Grove	50	50 (100%)	0
10-20 Doddington Grove	102	100 (98%)	2 (2%)
Keyworth Primary School Victorian building	40	40 (100%)	0
Keyworth Primary School new building	69	62 (90%)	7 (10%)
<b>Totals</b>	<b>438</b>	<b>413 (94.3%)</b>	<b>25 (5.7%)</b>

#### Daylight distribution impacts to rooms- No Sky Line test

Address	Number of habitable rooms assessed	Passes NSL test	Fails the NSL test
26 Braganza Street	5	5 (100%)	0
Royal British Legion building (34 Braganza Street)	12	10 (%)	2 (17%)
1 Gaza Street	13	12 (92%)	1 (8%)
15-27 Braganza Street	41	39 (%)	2 (5%)
46-62 Braganza Street	47	40 (%)	7 (15%)
1-39 Doddington Grove	29	29 (100%)	0
10-20 Doddington Grove	41	41 (100%)	0
Keyworth Primary School Victorian building	13	13 (100%)	0
Keyworth Primary School new building	10	10 (100%)	0
<b>Totals</b>	<b>211</b>	<b>199 (94.3%)</b>	<b>12 (5.7%)</b>

99. These results show that the proposal would have an acceptable impact on neighbouring properties:
100. No. 26 Braganza Street – all windows pass the VSC, NSL and APSH tests. The proposal would not cause noticeable overshadowing of the rear garden.
101. Royal British Legion building – all windows pass the VSC and APSH tests. Two rooms at first floor level facing onto block A across Gaza Street would have a 22% reduction in NSL which is slightly above the 20% reduction that is considered noticeable. As the proposal seeks to create a typical across-street relationship, and the VSC results show good levels of daylight reaching the window, the impact on these rooms is considered not to be a constraint on the proposed development. All rooms pass the sunlight test.

102. No. 1 Gaza Street – one ground floor room of this nursery (which is apparently used as a sleeping area for infants, with the curtains drawn most of the time) that faces south onto Block F fails the VSC, NSL and APSH tests. There would not be noticeable overshadowing impact to the outdoor play area. The proposal would not significantly affect the overall amenity of this children’s nursery.
103. Nos. 15-27 Braganza Street – while 15 windows fail the VSC test these serve non-habitable rooms (hallways and bathrooms). All habitable rooms pass the VSC and APSH tests. Two ground floor rooms would fail the NSL test but would retain good levels of daylight distribution to these rooms. By establishing typical across-street relationship, the impact on daylight distribution to these properties opposite is not considered to be a constraint on the development of the smaller part of the application site.
104. Nos. 46-62 Braganza Street – all windows to the 5 houses nos. 46-54 pass the VSC and APSH tests, although 7 rooms fail the NSL test with up to a 42% reduction in the room area with visible sky: the overall daylight provision of these three-storey houses is considered to remain acceptable for the amenity of these properties. The sun-on-ground test results for the rear gardens show a positive result with a reduction in overshadowing compared with the existing buildings. All rooms to the flats in nos. 56-62 Braganza Street would pass the VSC, NSL and APSH tests and there would be a reduction in overshadowing to the gardens.
105. Nos. 1-39 Doddington Grove – all rooms in Arnold House pass the VSC, NSL and APSH tests.
106. Nos. 10, 12, 14, 16, 18 and 20 Doddington Grove – all rooms pass the VSC, NSL and APSH tests. There would be no noticeable overshadowing impact to the rear gardens.
107. Keyworth Primary School main building – all rooms would pass the VSC, NSL and APSH tests. The proposal would not have a noticeable overshadowing effect to the play areas around the school buildings.
108. Keyworth Primary School new building – 7 windows serving 3 rooms would experience a noticeable reduction in VSC. These ground floor windows are located under a canopy and so receive low VSC results of less than 5%; all rooms would pass NSL indicating a good level of daylight overall. The loss of sunlight to these three rooms is a high percentage change as they currently receive very low levels of annual sunlight (only 2 to 4 hours) due to the canopy. Such an impact is considered not to cause harm to the overall amenity of this new school building, nor to be a constraint on the proposed development.

#### Privacy and outlook

109. The Residential Design Standards SPD requires developments to achieve a minimum of 12m at the front of the building and any elevation that fronts onto a highway, and a minimum of 21m at the rear of the building.
110. The western-most part of Block A would generally align with the footprint of the existing adjacent terraced houses, although the ground floor would project 2.2m further beyond the rear wall. This projection would not be overbearing, and a condition to require screening of the first floor roof terrace is proposed in the interest of neighbour privacy. The eastern most part of Block A would be set 9m from the boundary so that its projection (5m beyond no. 26’s rear wall) would not be intrusive to this neighbour, and screening to the second floor roof terrace would be required by

condition.

111. Block B would be set 3m from the southern boundary of the site with Keyworth Primary School (and the boundary wall rebuilt to a height of 3.3m), with windows to the first floor and above 4m from the boundary overlooking the school grounds and set 15m from the north-facing windows of the school. In terms of the overlooking of the school, the council must have regard to its safeguarding duty of protecting children and vulnerable adults. The school is set behind the houses along Doddington Grove and Sharsted Grove and so is already overlooked from the east and west. When compared with the existing overlooking from surrounding properties in this urban area, the additional overlooking from Block B at a distance of 15m is considered not to be harmful to the privacy and overall amenity of the school. The cycle store for Block B would be set on the rear boundary with nos. 10-14 Doddington Grove, with the proposed first and second floors set 3.5m back. When compared with the massing of the existing building in this corner of the site, the proposal is considered to have an acceptable impact to these Doddington Grove properties.
112. The three-storey northern end of Block C would be set on the boundary with nos. 46 and 48 Braganza Street's rear gardens, and 15m from the rear windows, with the higher parts of Block C set further from the boundary. The two windows proposed to the flank wall would be obscure glazed (and secured by condition). At this distance and when compared with the existing two-storey building along the boundary, this would not have an overbearing impact. The proposed bin store would be sited mainly alongside the flank wall of the Royal British Legion building and part of the outdoor area of the nursery; its siting and massing would not affect the outlook of neighbouring properties.
113. The rear windows of Block D would be 30m from the rear windows of nos. 46-54 Braganza Street and 15m from the garden boundary, although the first floor roof terraces would reduce these distances by 2m. This separation is considered sufficient to prevent an intrusive impact or material loss of privacy for these neighbours.
114. Block E would be set 16m from the rear windows of nos. 56-62 Braganza Street, and 4m from the flank of no. 10 Doddington Grove. The north-facing side windows shown at first and second floors (secondary windows) would be required to be obscure glazed to protect neighbour privacy, and the terrace at the northern end would require screening along its northern side to prevent views into the rear gardens of the Braganza Street properties. When compared with the massing of the existing building, the proposed Block E is considered not to have an overbearing impact on the outlook of the Doddington Grove and Braganza Street properties, and with the proposed conditions would not cause a material loss of privacy.
115. Block F would be set away from residential properties, but would have glass block openings facing the new school building on Gaza Street (22m to the west) and windows towards the nursery building to the north. With the restricted views through glass blocks, distance to the new school, and the current commercial use of the site looking onto the nursery, the proposed relationship with these educational sites is considered to be acceptable.

#### Pollution

116. The redevelopment of the site from Class B1 use and car parking to mainly residential with a reduced element of Class B1 is considered not to raise pollution risks for neighbouring properties. The proposed residential use sited next to existing residential use would be a neighbourly relationship, and Block F's location next to adjoining non-residential uses is appropriate. The proposal does not raise noise or

disturbance concerns for neighbouring properties when compared with the existing uses of the application site.

117. Conditions are recommended regarding internal noise levels for the residential properties, plant noise, servicing hours, air quality mitigation, boiler NOx emissions, lighting, land contamination, a construction environmental management plan to protect future and neighbouring occupiers from pollution during the construction and operational phases. Subject to these conditions the proposal would comply with policies 7.14 and 7.15 of the London Plan, 13 of the Core Strategy, and 3.1, 3.2, and 3.6 of the Southwark Plan.

## **Transportation and highways**

118. The London Plan policies in chapter 6 seek to ensure major developments are located in accessible locations, and support improvements to sustainable transport modes. Core Strategy policy 2 "Sustainable transport" encourages sustainable transport to reduce congestion, traffic and pollution. Policies 5.1 "Locating developments", 5.2 "Transport impacts", 5.3 "Walking and cycling", 5.6 "Car parking" and 5.7 "Parking standards for disabled people and the mobility impaired" seek to direct major developments towards transport nodes, provide adequate access, servicing, facilities for pedestrians and cyclists, and to minimise car parking provision while providing adequate parking for disabled people.
119. There are currently 20 parking spaces across both parts of the site, while the proposal provides just 3 spaces which would be disabled parking spaces. A Transport Statement has been provided with adequate evidence to support the proposal. The site has a PTAL rating of 5/6a due to the close proximity of Kennington Underground station and walking distance to bus services. There is no transport policy objection subject to the planning obligations and conditions suggested, and highways approvals where relevant.

### Parking

120. Evidence for the implications of losing the on-site parking spaces has been provided using parking surveys during May 2016. The proposed development would be car free except for the provision of three wheelchair accessible parking spaces. Evidence has been provided to demonstrate that parking pressure on the site is not significant. All new dwellings would be made permit free, and a condition for this is proposed. There are five car club spaces located within 500m walking distance and zip car membership is proposed for new eligible residents (to be secured by a planning obligation).

### Cycle Parking

121. The cycle parking proposals are satisfactory, and the detailed design would be conditioned. Future residents and staff would have ready access to the Santander Cycles docking station (which houses 35 bikes) in nearby Doddington Grove.

### Servicing and delivery, and site access

122. The smaller site would have no vehicle access and would be serviced from Braganza Street. The main part of the site has an existing vehicular access which would be retained in the redevelopment to provide access to the three wheelchair parking spaces. There would not be sufficient space within the site for a refuse collection vehicle to turn, so an enclosure has been added next to the vehicle entrance for the bins to be taken to on collection days by the site management. Further details of the appearance of the enclosure and the management arrangements would be required



by a suggested condition, and the landscaping details would need to confirm the heights of planting and boundaries within the visibility splays of the vehicle entrance, and show adequate manoeuvring space to the wheelchair parking spaces following comments from the Highways team.

123. A construction environmental management plan would be required by condition. The necessary highway works to Braganza Street and Doddington Grove to repave the footways, remove the redundant crossover, construct the retained crossover to standard and install yellow lines, relocate a lighting column, would be secured by a planning obligation. Subject to these requirements, the proposal would comply with the transport policies within the Core Strategy and saved Southwark Plan.

### **Trees and ecology**

124. Policies 5.10 and 5.11 of the London Plan encourage urban greening, and green walls and roofs, and policy 7.19 seeks positive contributions to biodiversity. Core Strategy policy 11 "Open spaces and wildlife" requires new developments to avoid harming protected species and to improve habitat. Policy 3.28 "Biodiversity" of the Southwark Plan encourages the inclusion of features which enhance biodiversity, and does not permit developments that would damage habitats or populations of protected species.
125. A semi-mature low amenity cherry tree and a group of elder and sycamore saplings are proposed for removal. These are not a constraint to development and their loss can be more than adequately mitigated via new landscaping (further details of which would be secured by condition). There are several mature trees on the street and in rear gardens that adjoin the site, therefore a tree protection measures condition is recommended.
126. The existing buildings have the potential to support foraging and roosting bats and additional bat survey work was undertaken during the course of this application. This additional survey found no bat roosts on the site, and no further surveys are required.
127. The proposal accord with planning policies by incorporating green roofs, bat boxes, and bird boxes as ecology improvements, and further details would be secured by condition to ensure compliance with Core Strategy policy 11 and policy 3.28 of the Southwark Plan.

### **Sustainability**

128. Core Strategy policy 13 "High environmental standards" requires developments to meet the highest possible environmental standards, to minimise greenhouse gas emissions, increase recycling, minimise water use, mitigate flood risk and reduce air and land pollution. Southwark Plan policies 3.3 "sustainability assessment", 3.4 "energy efficiency", 3.6 "air quality", 3.7 "waste reduction" and 3.9 "water" similarly relate to sustainability measures in developments, and the London Plan policies in chapter 5 address the same topics. The Sustainability Assessments SPD, and Sustainable Design and Construction SPD provide further information.

### Energy

129. Policy 5.2 of the London Plan requires residential buildings to be zero carbon, and commercial buildings to achieve Building Regulations compliance.
130. An outline energy statement has been submitted, which shows how the development would achieve a 36% reduction in carbon emissions beyond Building Regulations Part L 2013 through energy efficiency measures, and photovoltaic panels. A

contribution to the council's Carbon Off-set Fund of £53,604 would be required to achieve the zero carbon target of the London Plan for the residential elements of the proposal. This would be secured by a planning obligation.

#### BREEAM

131. The submitted BREEAM pre-assessment for office Block F shows that a "very good" rating can be secured, but that the targeted credits needed to achieve an "excellent" rating are dependent upon the fit out selection and may be difficult to obtain. A condition to secure at least a "very good" rating is proposed, to ensure compliance with policy 5.3 of the London Plan and Southwark Plan policy 3.4.

#### Flooding and drainage

132. The site is within flood zone 3, but benefits from flood defences. No flood mitigation measures are considered necessary and no bedrooms are proposed on the ground floors of any of the blocks.
133. The proposal would result in an overall reduction in the footprint of buildings on the site, and creation of garden areas and central landscaping would introduce more soft landscaping on the site. The revised drainage strategy addressed the queries from the Flood and Drainage Scheme, and provides a suitable level of sustainable drainage measures.
134. The revised flood risk assessment has addressed the Environment Agency's earlier objection, and shows that the proposal has taken sufficient consideration of the flood risk to future residents and surrounding properties. Conditions are proposed to ensure compliance with the flood and drainage documents.
135. The proposal would comply with London Plan policies 5.12 and 5.13, Core Strategy policy 13, and saved policy 3.9 of the Southwark Plan.

#### Contamination

136. A soil investigation report was provided which details the results of the intrusive soil investigations. An area of contaminated soil was identified in the small car park part of the site, so it is proposed to replace the top metre of soil and replace it with clean fill, and for the soft landscaping to be finished with 30cm of clean topsoil. A condition to require further details of the contamination and any necessary remediation is included in the proposal to ensure compliance with policies 3.2 of the Southwark Plan and 13 of the Core Strategy.

#### **Planning obligations and Community Infrastructure Levy (CIL)**

137. 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. In this instance it is estimated that a Mayoral CIL payment and Southwark CIL payment would be payable in the event planning permission is granted.
138. The Mayoral CIL is levied in Southwark at £35 per sqm and Southwark CIL at £200 per square metre in this location for residential, and £0 per square metre for office; both CIL charges are subject to indexation. However, affordable housing relief is

available and in the event that planning permission is granted an application should be made to secure this prior to the commencement of development. The estimates are as follows (once affordable housing relief is applied): Mayoral CIL £32,768 and Southwark CIL £161,220. Payment of the Mayoral CIL would accord with policy 8.3 of the London Plan.

139. The development would either be delivered by the council or by a private developer pursuant to a development agreement. As the council owns the land, it is necessary for the council to enter into a unilateral undertaking confirming that the planning obligations will be paid and/or provided. A unilateral undertaking is a type of planning agreement that will bind the land in the same way that a section 106 agreement does. A unilateral undertaking is considered appropriate here because the council cannot covenant with itself, which would be necessary if a section 106 agreement was required. Should the land be disposed of in the future, the unilateral undertaking to be provided would require any successor in title to enter into a section 106 agreement in the usual way. This is the approach the council has adopted on all Hidden Home, Direct Delivery and SRPP schemes.
140. The following table sets out the required site specific mitigation and the applicant's position with regard to each point:

<b>Planning obligation</b>	<b>Mitigation</b>	<b>Applicant's position</b>
Affordable housing	Provision of 5 affordable units to be provided (1 x 1-bedroom flat, 1 x 2-bedroom maisonette and 3 x 3-bedroom maisonettes) as intermediate tenure, with the eligibility criteria and income thresholds defined. Linking this application to the Manor Place planning application ref. 17/AP/0907 to ensure the total affordable housing and wheelchair housing provision are provided across the two sites.	Agreed
Carbon offset Green Fund	Payment of £53,604 (indexed) based on the shortfall of 29.78 tones of carbon per year over a 30 year period.	Agreed
Car club	Provision of three years membership for each eligible resident	Agreed
Car parking	A car parking management plan detailing the management and allocation of off-street wheelchair parking bays	Agreed
Children's play space	Payment of £4,530 (indexed) to address the 30sqm shortfall of play-space for children aged 5-12+ years.	Agreed
Employment and enterprise	Local procurement and supply chain measures for the construction phase and end use.	Agreed
Highway works	Section 278 agreement to: <ul style="list-style-type: none"> <li>• Repave the footway fronting the development including new kerbing on Braganza Street, Gaza Street and Doddington Grove using materials in accordance with Southwark's Streetscape Design Manual (concrete paving slabs and granite kerbs).</li> <li>• Construct the vehicle crossover on Braganza Street to current SSDM</li> </ul>	Agreed

	<p>standards.</p> <ul style="list-style-type: none"> <li>• Reinstate redundant vehicle crossover on Braganza Street as footway.</li> <li>• Upgrade pedestrian crossing at Gaza Street's junction with Braganza Street to current standards</li> <li>• Repair any damages to the highway within the vicinity of the development resulting from construction vehicles.</li> <li>• Relocate existing street lighting column on Gaza Street.</li> <li>• Install a length of parking restrictions (double yellow lines) across the vehicular entrance on Braganza Street.</li> </ul>	
Administration charge (2%)	Payment to cover the costs of monitoring these necessary planning obligations (2% of £58,134 = £1,162.68).	Agreed

141. These obligations are necessary in order to make the development acceptable in planning terms, and to ensure the proposal accords with policies 2.5 of the Southwark Plan, Core Strategy policy 14, London Plan policy 8.2, and the Section 106 Planning Obligations and CIL SPD.

142. In the event that a satisfactory legal agreement has not been entered into by 31<sup>st</sup> January 2018 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 planning obligations agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2015) and the Planning Obligations and Community Infrastructure Levy SPD (2015).”*

#### **Other matters**

143. None

#### **Conclusion on planning issues**

144. The existing workshops and private parking uses on the site are not protected by planning policies. The proposed redevelopment of this brownfield site would accord with policies in the NPPF, London Plan, Core Strategy and saved Southwark Plan. The proposed housing would form part of the Southwark Regeneration in Partnership Programme across the borough, and would provide a high quality design and accommodation for future residents in a mix of private and affordable housing. While this scheme proposes less than a policy-compliant proportion of affordable housing, when the 53% affordable provision is considered in the nearby 161-179 Manor Place proposal as a linked SRPP scheme, the two proposals together provide 40.4% affordable housing. The surplus for these two schemes would be used to cross subsidise other SRPP projects that are otherwise unviable or marginal sites.

145. The contemporary design references the scale of the surrounding houses and elements of the listed buildings, and is an acceptable layout, scale and high quality, detailed design. The proposal would not cause harm to neighbour amenity, and

complies with policies in terms of transport, sustainability, and ecology impacts.

146. The application is recommended for approval subject to the conditions set out below, and completion of a unilateral undertaking to secure the obligations identified above (to provide necessary mitigation and ensure policy compliance).

### **Community impact statement**

147. 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.

### **Consultations**

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

### **Consultation replies**

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

#### Summary of responses from the consultation undertaken

150. 2 letters were received objecting to the proposal on the following summarised grounds:

**Objection:** The design of Block A is not in keeping and should be amended to have a pitched roof to match the rest of the Braganza Street terrace, and remove the roof terrace.

**Response:** It is not considered necessary for the design of block A to replicate the existing terrace. There is a variety of architectural styles in Braganza Street. The proposed height, layout and detailed design of block A are acceptable for the streetscene.

**Objection:** Overlooking to nos. 60-62 Braganza Street.

**Response:** The side windows to Block E would be conditioned to be obscure glazed. Windows to Block D are at sufficient distance to prevent a material loss of privacy.

**Objection:** Block A will cause loss of daylight and privacy.

**Response:** There would not be a noticeable loss of daylight or sunlight to neighbouring properties from this block. The existing terraced housing has mutual overlooking from first floor windows, which would be continued by the window arrangement of the proposed block. Screening to the roof terrace would be required by condition.

**Objection:** Impact of Block E on nos. 58-62 Braganza Street's garden by requiring the removal of the garden wall, impact on the wildlife during the building process.

**Response:** A construction management plan would be developed by the contractor

prior to construction, in consultation with neighbouring parties and to develop ways to minimise the impact of the construction on the neighbouring properties. The contractors and client will seek to protect trees and specific plants, and to minimise the impact on wildlife.

**Objection:** Questioning how many of the affordable units would be maintained by Southwark Council and not sold on.

**Response:** None would be maintained by the council but by a registered social housing provider with restrictions on their sale.

**Objection:** The new houses in block A should be restricted to prevent them being converted into flats or rented out.

**Response:** Converting a house into flats would require planning permission. It is not possible to condition a property to prevent a private house being rented out.

151. 3 letters of support were received with the following summarised comments:

**Comment:** The new buildings are attractive and will provide much needed new housing.

**Response:** N/a

**Comment:** Support but disappointed with the small proportion of social housing.

**Response:** The affordable housing within this scheme is below policy requirements, however the project is linked with the redevelopment of 161 Manor Place. A policy compliant 40% affordable housing (by habitable rooms) would be provided when the two schemes are combined.

**Comment:** Support overall but concerns of overlooking from a balcony of Block B to Doddington Grove.

**Response:** Screening would be required by a condition.

**Comment:** The gate should have a slow-closing, quiet mechanism to avoid disturbance, and consideration given to how to ensure this area does not become a new focal point for local children/youths. Concern that the cycle store roof may be used by people climbing into the Doddington Grove rear gardens.

**Response:** The proposal would be required to comply with the Secured by Design scheme. The potential for noise from a closing gate goes beyond the level of detail the planning system can consider, and is not a reason to refuse the application nor require details by condition.

**Comment:** Consideration of child safety is needed while the construction takes place.

**Response:** The construction environmental management plan would need to consider the impact of construction traffic on the safety of school children.

**Comment:** Concerns about the impacts on the boundary walls, whether they would need strengthening, what will replace it and what will be done to ameliorate the dirt and disruption during demolition.

**Response:** Party wall matters regarding the state of a boundary wall are not planning considerations. A construction management plan will be developed by the contractor

in consultation with neighbouring properties to try to minimise dirt and disruption. Some limited access might be needed and a separate boundary wall might be beneficial to neighbouring properties during the construction of the actual party wall.

#### Summary of the responses received to the reconsultation

152. One objection received:

**Comment:** Repeating the earlier objection to Block A and its height in comparison to no 26 Braganza, and the proposed roof terraces which would affect neighbour privacy and noise in area where no other houses have such terraces.

**Response:** As set out above, is not considered necessary for the design of block A to replicate the existing terrace and the proposed height and detailed design are considered acceptable. The terraces would have screening to restrict views out and their use by residential properties in a residential area is considered unlikely to result in a significant increase in noise to surrounding properties.

#### **Environment Agency**

153. The revised flood risk assessment is acceptable and addresses the EA's earlier objection. Sleeping areas have floor levels set above the modelled flood depths.

#### **Flood and Drainage Team**

154. The revised drainage strategy is acceptable.

#### **Highways**

155. Requested further information on the vehicle tracking movements for the disabled parking spaces and for a refuse vehicle. If permission is granted the developer must enter into a s278 agreement for works to the pavement and kerb on Braganza Street, Gaza Street and Doddington Grove, relocate a lighting column and upgrade the pedestrian crossing at Gaza Street, add yellow lines across the vehicle entrance. A CEMP should be required by condition.

#### **Local Economy Team**

156. The proposal does not meet the threshold for construction employment or end user employment obligations. LET hold the council's approved workspace provider list which can be shared with the applicant to allow them to consider which provider or providers they wish to approach for Block F.

#### **London Underground**

157. Has no objection.

#### **Metropolitan Police**

158. Condition recommended for Secured by Design.

#### **Natural England**

159. No comment on this proposal.

#### **Transport for London**

160. Has no objection.

### Human rights implications

161. 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.

162. This application has the legitimate aim of providing new homes and new office space through the redevelopment of a brownfield site. 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/1027-42 Application file: 17/AP/0964 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 1412 Council website: www.southwark.gov.uk

### APPENDICES

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

### AUDIT TRAIL

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Victoria Crosby, Senior Planner	
<b>Version</b>	Final	
<b>Dated</b>	5 September 2017	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>	7 September 2017	



# APPENDIX 1

## Consultation undertaken

**Site notice date:** 13/04/2017

**Press notice date:** 13/04/2017

**Case officer site visit date:** 13/04/2017

**Neighbour consultation letters sent:** 12/04/2017

### Internal services consulted:

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

### Statutory and non-statutory organisations consulted:

EDF Energy  
Environment Agency  
Historic England  
London Fire & Emergency Planning Authority  
London Underground Limited  
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:

26a Doddington Grove London SE17 3TT  
26b Doddington Grove London SE17 3TT  
36a Doddington Grove London SE17 3TT  
Flat 97 Dickens House SE17 3SZ  
Flat 98 Dickens House SE17 3SZ  
Flat 99 Dickens House SE17 3SZ  
43c De Laune Street London SE17 3UR  
43a De Laune Street London SE17 3UR  
Flat 119 Dickens House SE17 3SZ  
Flat 120 Dickens House SE17 3SZ  
Flat 121 Dickens House SE17 3SZ  
Flat 116 Dickens House SE17 3SZ  
Flat 117 Dickens House SE17 3SZ  
Flat 118 Dickens House SE17 3SZ  
Flat 122 Dickens House SE17 3SZ  
Flat 126 Dickens House SE17 3SZ  
Flat 127 Dickens House SE17 3SZ  
Flat 96 Dickens House SE17 3SZ  
Flat 123 Dickens House SE17 3SZ  
Flat 124 Dickens House SE17 3SZ  
Flat 125 Dickens House SE17 3SZ

114 Alberta Street London SE17 3RT  
116 Alberta Street London SE17 3RT  
118 Alberta Street London SE17 3RT  
108 Alberta Street London SE17 3RT  
110 Alberta Street London SE17 3RT  
112 Alberta Street London SE17 3RT  
12 Braganza Street London SE17 3RJ  
14 Braganza Street London SE17 3RJ  
16 Braganza Street London SE17 3RJ  
73 Braganza Street London SE17 3RD  
9 Braganza Street London SE17 3RD  
10 Braganza Street London SE17 3RJ  
18 Braganza Street London SE17 3RJ  
26 Braganza Street London SE17 3RJ  
46 Braganza Street London SE17 3RJ  
20 Braganza Street London SE17 3RJ  
22 Braganza Street London SE17 3RJ  
24 Braganza Street London SE17 3RJ  
14 Ambergate Street London SE17 3RX  
18 Ambergate Street London SE17 3RX  
2 Ambergate Street London SE17 3RX

34 De Laune Street London SE17 3UU  
35 De Laune Street London SE17 3UU  
36 De Laune Street London SE17 3UU  
31 De Laune Street London SE17 3UU  
32 De Laune Street London SE17 3UU  
33 De Laune Street London SE17 3UU  
Flat 1 37a De Laune Street SE17 3UU  
26-28 Ambergate Street London SE17 3RX  
30-32 Ambergate Street London SE17 3RX  
54-56 Ambergate Street London SE17 3RX  
37b De Laune Street London SE17 3UU  
34-40 Braganza Street London SE17 3RJ  
24 Ambergate Street London SE17 3RX  
24 De Laune Street London SE17 3UU  
29 De Laune Street London SE17 3UU  
30 De Laune Street London SE17 3UU  
Flat 1 53 De Laune Street SE17 3UR  
23 De Laune Street London SE17 3UU  
76 Colet House Doddington Grove SE17 3SY  
77 Colet House Doddington Grove SE17 3SY  
78 Colet House Doddington Grove SE17 3SY  
73 Colet House Doddington Grove SE17 3SY  
74 Colet House Doddington Grove SE17 3SY  
75 Colet House Doddington Grove SE17 3SY  
79 Colet House Doddington Grove SE17 3SY  
83 Colet House Doddington Grove SE17 3SY  
84 Colet House Doddington Grove SE17 3SY  
85 Colet House Doddington Grove SE17 3SY  
80 Colet House Doddington Grove SE17 3SY  
81 Colet House Doddington Grove SE17 3SY  
82 Colet House Doddington Grove SE17 3SY  
63 Burns House Doddington Grove SE17 3SX  
64 Burns House Doddington Grove SE17 3SX  
65 Burns House Doddington Grove SE17 3SX  
60 Burns House Doddington Grove SE17 3SX  
61 Burns House Doddington Grove SE17 3SX  
62 Burns House Doddington Grove SE17 3SX  
66 Colet House Doddington Grove SE17 3SY  
70 Colet House Doddington Grove SE17 3SY  
71 Colet House Doddington Grove SE17 3SY  
72 Colet House Doddington Grove SE17 3SY  
67 Colet House Doddington Grove SE17 3SY  
68 Colet House Doddington Grove SE17 3SY  
69 Colet House Doddington Grove SE17 3SY  
Flat 106 Dickens House SE17 3SZ  
Flat 107 Dickens House SE17 3SZ  
Flat 108 Dickens House SE17 3SZ  
Flat 103 Dickens House SE17 3SZ  
Flat 104 Dickens House SE17 3SZ  
Flat 105 Dickens House SE17 3SZ  
Flat 109 Dickens House SE17 3SZ  
Flat 113 Dickens House SE17 3SZ  
Flat 114 Dickens House SE17 3SZ  
Flat 115 Dickens House SE17 3SZ  
Flat 110 Dickens House SE17 3SZ  
Flat 111 Dickens House SE17 3SZ  
Flat 112 Dickens House SE17 3SZ  
89 Colet House Doddington Grove SE17 3SY  
90 Colet House Doddington Grove SE17 3SY  
91 Colet House Doddington Grove SE17 3SY  
86 Colet House Doddington Grove SE17 3SY  
87 Colet House Doddington Grove SE17 3SY  
88 Colet House Doddington Grove SE17 3SY  
92 Colet House Doddington Grove SE17 3SY  
Flat 100 Dickens House SE17 3SZ  
Flat 101 Dickens House SE17 3SZ  
Flat 102 Dickens House SE17 3SZ  
93 Colet House Doddington Grove SE17 3SY  
94 Colet House Doddington Grove SE17 3SY  
95 Colet House Doddington Grove SE17 3SY  
Flat Ta Centre SE17 3RD  
Flat A 60-62 Braganza Street SE17 3RJ  
Flat B 60-62 Braganza Street SE17 3RJ  
44b De Laune Street London SE17 3UR  
First Floor Flat 45 De Laune Street SE17 3UR  
54b De Laune Street London SE17 3UR  
Flat C 60-62 Braganza Street SE17 3RJ  
Flat C 56-58 Braganza Street SE17 3RJ  
46a De Laune Street London SE17 3UR  
97 Alberta Street London SE17 3RU  
10 Ambergate Street London SE17 3RX  
12 Ambergate Street London SE17 3RX  
20 Ambergate Street London SE17 3RX  
4 Ambergate Street London SE17 3RX  
40 Ambergate Street London SE17 3RX  
42 Ambergate Street London SE17 3RX  
34 Ambergate Street London SE17 3RX  
36 Ambergate Street London SE17 3RX  
38 Ambergate Street London SE17 3RX  
77 Alberta Street London SE17 3RU  
79 Alberta Street London SE17 3RU  
81 Alberta Street London SE17 3RU  
120 Alberta Street London SE17 3RT  
73 Alberta Street London SE17 3RU  
75 Alberta Street London SE17 3RU  
83 Alberta Street London SE17 3RU  
91 Alberta Street London SE17 3RU  
93 Alberta Street London SE17 3RU  
95 Alberta Street London SE17 3RU  
85 Alberta Street London SE17 3RU  
87 Alberta Street London SE17 3RU  
89 Alberta Street London SE17 3RU  
2a Braganza Street London SE17 3RJ  
Building 3 Rooms 15 And 16 42 Braganza Street SE17 3RJ  
Building 1 Rooms 1 To 2 And 4 To 12 42 Braganza Street SE17 3RJ  
Flat 3 Braganza Street SE17 3RD  
Building 3 Room 14 42 Braganza Street SE17 3RJ  
Flat 1 122 Alberta Street SE17 3RT  
Ground Floor And Part First Floor Flat 50a De Laune Street SE17 3UR  
Building 3 Room 17 42 Braganza Street SE17 3RJ  
Building 3 Units 6 42 Braganza Street SE17 3RJ  
Building 3 Unit 8 42 Braganza Street SE17 3RJ  
Building 3 Units 9 To 12 42 Braganza Street SE17 3RJ  
Building 2 First Floor 42 Braganza Street SE17 3RJ  
Building 2 Ground Floor 42 Braganza Street SE17 3RJ  
Building 3 Unit 14 42 Braganza Street SE17 3RJ  
Building 3 Unit 4 42 Braganza Street SE17 3RJ  
Building 3 Room 13 42 Braganza Street SE17 3RJ  
Building 3 Room 3 42 Braganza Street SE17 3RJ  
Building 3 Units 3 And 5 42 Braganza Street SE17 3RJ  
Building 3 Unit 2 42 Braganza Street SE17 3RJ  
Building 3 Unit 1 42 Braganza Street SE17 3RJ  
29 Braganza Street London SE17 3RD  
31 Braganza Street London SE17 3RD  
33 Braganza Street London SE17 3RD  
23 Braganza Street London SE17 3RD  
25 Braganza Street London SE17 3RD  
27 Braganza Street London SE17 3RD  
35 Braganza Street London SE17 3RD  
43 Braganza Street London SE17 3RD  
7 Braganza Street London SE17 3RD  
37 Braganza Street London SE17 3RD  
39 Braganza Street London SE17 3RD  
41 Braganza Street London SE17 3RD  
8 Doddington Grove London SE17 3TT  
49b De Laune Street London SE17 3UR  
Flat 2 122 Alberta Street SE17 3RT  
49a De Laune Street London SE17 3UR  
22 Ambergate Street London SE17 3RX  
17 Braganza Street London SE17 3RD  
19 Braganza Street London SE17 3RD  
21 Braganza Street London SE17 3RD  
11 Braganza Street London SE17 3RD  
13 Braganza Street London SE17 3RD  
15 Braganza Street London SE17 3RD  
Flat 30 Arnold House SE17 3SU  
Flat 31 Arnold House SE17 3SU  
Flat 32 Arnold House SE17 3SU  
Flat 28 Arnold House SE17 3SU  
Flat 29 Arnold House SE17 3SU  
Flat 3 Arnold House SE17 3SU  
Flat 33 Arnold House SE17 3SU  
Flat 37 Arnold House SE17 3SU  
Flat 38 Arnold House SE17 3SU  
Flat 39 Arnold House SE17 3SU  
Flat 34 Arnold House SE17 3SU  
Flat 35 Arnold House SE17 3SU  
Flat 36 Arnold House SE17 3SU

47a De Laune Street London SE17 3UR  
Flat D 60-62 Braganza Street SE17 3RJ  
Flat A 56-58 Braganza Street SE17 3RJ  
Flat B 56-58 Braganza Street SE17 3RJ  
First Floor And Second Floor Flat 4 Braganza Street SE17 3RJ  
46b De Laune Street London SE17 3UR  
47b De Laune Street London SE17 3UR  
5a Braganza Street London SE17 3RD  
5b Braganza Street London SE17 3RD  
56 Ambergate Street London SE17 3RX  
First Floor And Second Floor Flat 50 De Laune Street SE17 3UR  
40b De Laune Street London SE17 3UR  
42b De Laune Street London SE17 3UR  
41b De Laune Street London SE17 3UR  
First Floor And Second Floor Flat 51 De Laune Street SE17 3UR  
Flat B 52 De Laune Street SE17 3UR  
Flat B 39 De Laune Street SE17 3UR  
40c De Laune Street London SE17 3UR  
42c De Laune Street London SE17 3UR  
41c De Laune Street London SE17 3UR  
Flat B 51a De Laune Street SE17 3UR  
Second Floor Flat 45 De Laune Street SE17 3UR  
Flat C 39 De Laune Street SE17 3UR  
44c De Laune Street London SE17 3UR  
1 Gaza Street London SE17 3RJ  
54c De Laune Street London SE17 3UR  
Basement And Ground Floor 1c Braganza Street SE17 3RD  
Rear Of 1c Braganza Street SE17 3RD  
Flat A 51a De Laune Street SE17 3UR  
Flat A 39 De Laune Street SE17 3UR  
40a De Laune Street London SE17 3UR  
Ground Floor And First Floor Flat 50 De Laune Street SE17 3UR  
Ground Floor And First Floor Flat 51 De Laune Street SE17 3UR  
Flat A 52 De Laune Street SE17 3UR  
42a De Laune Street London SE17 3UR  
54a De Laune Street London SE17 3UR  
48b De Laune Street London SE17 3UR  
First Floor And Second Floor Flat 50a De Laune Street SE17 3UR  
41a De Laune Street London SE17 3UR  
44a De Laune Street London SE17 3UR  
Ground Floor Flat 45 De Laune Street SE17 3UR  
27 De Laune Street London SE17 3UU  
28 De Laune Street London SE17 3UU  
38 De Laune Street London SE17 3UR  
Flat 117a Dickens House SE17 3SZ  
25 De Laune Street London SE17 3UU  
26 De Laune Street London SE17 3UU  
54 Sharsted Street London SE17 3TN  
62 Sharsted Street London SE17 3TN  
64 Sharsted Street London SE17 3TN  
66 Sharsted Street London SE17 3TN  
56 Sharsted Street London SE17 3TN  
58 Sharsted Street London SE17 3TN  
60 Sharsted Street London SE17 3TN  
Flat 1 37 De Laune Street SE17 3UU  
Flat 2 37 De Laune Street SE17 3UU  
Flat 3 37 De Laune Street SE17 3UU  
48a De Laune Street London SE17 3UR  
School House Faunce Street SE17 3TR  
Flat 4 37 De Laune Street SE17 3UU  
61a Burns House Doddington Grove SE17 3SX  
61b Burns House Doddington Grove SE17 3SX  
95a Colet House Doddington Grove SE17 3SY  
Flat 5 37 De Laune Street SE17 3UU  
Flat 6 37 De Laune Street SE17 3UU  
Flat 22a Arnold House SE17 3SU  
Flat 3 37a De Laune Street SE17 3UU  
Building 3 Units 7 42 Braganza Street SE17 3RJ  
Flat 1 Keystone House SE17 3RT  
Flat 6 53 De Laune Street SE17 3UR  
43b De Laune Street London SE17 3UR  
Flat 2 37a De Laune Street SE17 3UU  
Flat 2 Keystone House SE17 3RT  
Flat 19 Arnold House SE17 3SU  
Flat 2 Arnold House SE17 3SU  
Flat 20 Arnold House SE17 3SU  
Flat 16 Arnold House SE17 3SU  
Flat 17 Arnold House SE17 3SU  
Flat 18 Arnold House SE17 3SU  
Flat 21 Arnold House SE17 3SU  
Flat 25 Arnold House SE17 3SU  
Flat 26 Arnold House SE17 3SU  
Flat 27 Arnold House SE17 3SU  
Flat 22 Arnold House SE17 3SU  
Flat 23 Arnold House SE17 3SU  
Flat 24 Arnold House SE17 3SU  
50 Burns House Doddington Grove SE17 3SX  
51 Burns House Doddington Grove SE17 3SX  
52 Burns House Doddington Grove SE17 3SX  
47 Burns House Doddington Grove SE17 3SX  
48 Burns House Doddington Grove SE17 3SX  
49 Burns House Doddington Grove SE17 3SX  
53 Burns House Doddington Grove SE17 3SX  
57 Burns House Doddington Grove SE17 3SX  
58 Burns House Doddington Grove SE17 3SX  
59 Burns House Doddington Grove SE17 3SX  
54 Burns House Doddington Grove SE17 3SX  
55 Burns House Doddington Grove SE17 3SX  
56 Burns House Doddington Grove SE17 3SX  
Flat 7 Arnold House SE17 3SU  
Flat 8 Arnold House SE17 3SU  
Flat 9 Arnold House SE17 3SU  
Flat 4 Arnold House SE17 3SU  
Flat 5 Arnold House SE17 3SU  
Flat 6 Arnold House SE17 3SU  
40 Burns House Doddington Grove SE17 3SX  
44 Burns House Doddington Grove SE17 3SX  
45 Burns House Doddington Grove SE17 3SX  
46 Burns House Doddington Grove SE17 3SX  
41 Burns House Doddington Grove SE17 3SX  
42 Burns House Doddington Grove SE17 3SX  
43 Burns House Doddington Grove SE17 3SX  
52 Sharsted Street London SE17 3TN  
33 Sharsted Street London SE17 3TP  
35 Sharsted Street London SE17 3TP  
46 Sharsted Street London SE17 3TN  
48 Sharsted Street London SE17 3TN  
50 Sharsted Street London SE17 3TN  
37 Sharsted Street London SE17 3TP  
45 Sharsted Street London SE17 3TP  
47 Sharsted Street London SE17 3TP  
49 Sharsted Street London SE17 3TP  
39 Sharsted Street London SE17 3TP  
41 Sharsted Street London SE17 3TP  
43 Sharsted Street London SE17 3TP  
50 Ambergate Street London SE17 3RX  
52 Ambergate Street London SE17 3RX  
58 Ambergate Street London SE17 3RX  
44 Ambergate Street London SE17 3RX  
46 Ambergate Street London SE17 3RX  
48 Ambergate Street London SE17 3RX  
6 Ambergate Street London SE17 3RX  
66 Ambergate Street London SE17 3RX  
68 Ambergate Street London SE17 3RX  
8 Ambergate Street London SE17 3RX  
60 Ambergate Street London SE17 3RX  
62 Ambergate Street London SE17 3RX  
64 Ambergate Street London SE17 3RX  
36 Doddington Grove London SE17 3TT  
1a Braganza Street London SE17 3RD  
1b Braganza Street London SE17 3RD  
30 Doddington Grove London SE17 3TT  
32 Doddington Grove London SE17 3TT  
34 Doddington Grove London SE17 3TT  
Flat 1 Arnold House SE17 3SU  
Flat 13 Arnold House SE17 3SU

22a Doddington Grove London SE17 3TT  
22b Doddington Grove London SE17 3TT  
Keyworth Primary School Faunce Street SE17 3TR  
Flat 3 Keystone House SE17 3RT  
Flat 39a Arnold House SE17 3SU  
38a De Laune Street London SE17 3UR  
68 Sharsted Street London SE17 3TN  
70 Sharsted Street London SE17 3TN  
72 Sharsted Street London SE17 3TN  
1 Braganza Street London SE17 3RD  
Flat 3 53 De Laune Street SE17 3UR  
Flat 4 53 De Laune Street SE17 3UR  
Flat 5 53 De Laune Street SE17 3UR  
3 Braganza Street London SE17 3RD  
2 Braganza Street London SE17 3RJ  
Flat 2 53 De Laune Street SE17 3UR  
54 Braganza Street London SE17 3RJ  
48 Braganza Street London SE17 3RJ  
50 Braganza Street London SE17 3RJ  
52 Braganza Street London SE17 3RJ  
8 Braganza Street London SE17 3RJ

Flat 14 Arnold House SE17 3SU  
Flat 15 Arnold House SE17 3SU  
Flat 10 Arnold House SE17 3SU  
Flat 11 Arnold House SE17 3SU  
Flat 12 Arnold House SE17 3SU  
41 Faunce Street London SE17 3TR  
10 Doddington Grove London SE17 3TT  
12 Doddington Grove London SE17 3TT  
35 Faunce Street London SE17 3TR  
37 Faunce Street London SE17 3TR  
39 Faunce Street London SE17 3TR  
14 Doddington Grove London SE17 3TT  
24 Doddington Grove London SE17 3TT  
28 Doddington Grove London SE17 3TT  
16 Doddington Grove London SE17 3TT  
18 Doddington Grove London SE17 3TT  
20 Doddington Grove London SE17 3TT

C/O Members Room x  
42 Fleming Road London SE17 3QR

**Re-consultation: 16/8/17**

## APPENDIX 2

### Consultation responses received

#### Internal services

Ecology Officer  
Economic Development Team  
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]  
Flood and Drainage Team  
Highways Development Management

#### Statutory and non-statutory organisations

Environment Agency  
Historic England  
London Underground Limited  
Metropolitan Police Service (Designing out Crime)  
Natural England  
Transport for London  
Thames Water - Development Planning

#### Neighbours and local groups

Flat D 60-62 Braganza Street SE17 3RJ  
12 Doddington Grove London SE17 3TT  
42 Fleming Road London SE17 3QR  
54 Braganza Street London SE17 3RJ  
72 Sharsted Street London SE17 3TN