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| Item No. 10.1 | Classification: Open | Date: 18 December 2017 | Meeting Name: Planning Committee |
| Report title: | Development Management planning application: 16/AP/4458 for: Full Planning Permission Address: SHOPPING CENTRE SITE, ELEPHANT AND CASTLE, 26, 28, 30 AND 32 NEW KENT ROAD, ARCHES 6 AND 7 ELEPHANT ROAD, AND LONDON COLLEGE OF COMMUNICATIONS SITE, LONDON SE1 SE1 Proposal: Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures. | | |
| Ward(s) or groups affected: | East Walworth Cathedrals | | |
| From: | Director of Planning | | |
| Application Start Date 02/12/2016 | | Application Expiry Date 24/03/2017 | |
| Earliest Decision Date 19/01/2017 | | Draft Planning Performance Agreement | |

RECOMMENDATIONS

1.
 - a) That planning permission be granted, subject to conditions and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than 18 December 2018.
 - b) That environmental information be taken into account as required by Regulation 3(4) of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 (as amended).
 - c) That following the issuing of the permission, the director of planning place a statement on the statutory register pursuant to Regulation 24 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 which contains the information required by Regulation 21, and that for the purposes of Regulation 24(1)(c) the main reasons and considerations on which the planning committee's decision is based are as set out as in the report.

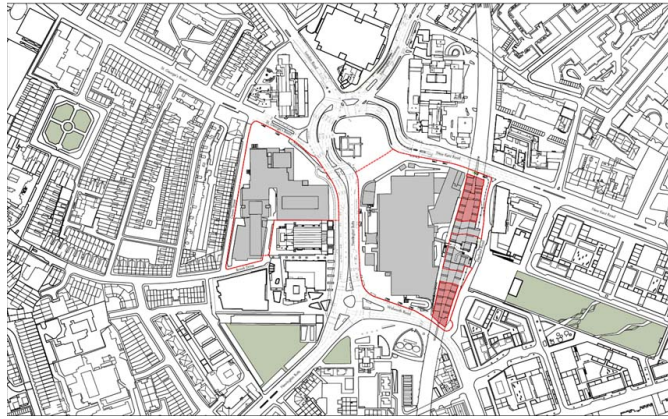
- d) In the event that the requirements of (a) are not met by 18 December 2018, that the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 713 of this report.

BACKGROUND INFORMATION

2. Two applications have been submitted by Elephant and Castle Properties Co. Ltd. The first is for full planning permission for a comprehensive redevelopment of Elephant and Castle shopping centre, 26, 28, 30 New Kent Road and arches 6 and 7 Elephant Road, and the London College of Communications (LCC) site. The existing London College of Communications building would be demolished, and it adjoins the northern elevation of the Metropolitan Tabernacle church, the façade of which is grade II listed. In light of this a second application for listed building consent for minor amendments to the northern elevation of the Tabernacle has been submitted, and this is considered in a separate report listed as item 10.2 on the committee agenda.

Site location and description

3. The site is located in the heart of the Elephant and Castle Opportunity Area which covers an area spanning 122 hectares. It extends just beyond St George's Circus to the north, New Kent Road to the east, Walworth Road as far as Burgess Park to the south, and Kennington Park Road to the west; the borough boundary with Lambeth is approximately 160m to the south-west. Located on what for centuries was the main road into London from the south, Elephant and Castle has long been a bustling south London centre and is a transport hub, served by both the Northern and Bakerloo Line underground lines, a railway station and numerous bus routes. The number of theatres and taverns which were established in the area gave it a reputation as the "Piccadilly Circus" of south London. However, the area was redeveloped in the 1960s following bomb damage during WWII, and a number of issues arose out of the redevelopment including a predominance of large, single use buildings, an environment dominated by heavy traffic, and disconnected public realm.
4. Elephant and Castle is undergoing a period of transformation, with significant redevelopment taking place. The local planning policy framework for managing the regeneration of the area is the adopted Elephant and Castle Supplementary Planning Document / Opportunity Area Planning Framework (SPD / OAPF). The SPD sets out a vision for the area which includes transforming it into an attractive central London destination, making it a more desirable place to live for existing and new residents, with excellent shopping, leisure, learning and cultural facilities, and significant new housing.
5. The site comprises two distinct areas located on opposite sides of Elephant and Castle. They are described in the submission as the east site and the west site, and they occupy a combined area of 3.56 hectares (ha). The east site comprises Elephant and Castle Shopping Centre, 26, 28, 30 and 32 New Kent Road and Arches 6 and 7 Elephant Road, and the west site is the London College of Communications (LCC) which sits under the University of the Arts London (UAL) umbrella. Both parts of the site sit within in the SPD central character area, and the east site sits within the SPD core area which is to be the main focus for development activity.



East and West Sites

East site

6. This part of the site measures 2.21ha and is bound by New Kent Road and a new area of public realm known as the Peninsula to the north (the entrance to the Bakerloo Line underground station is further north again), an elevated railway viaduct incorporating Elephant and Castle Railway Station to the east, Walworth Road to the south, and Elephant and Castle to the west. It contains a number of buildings, the largest of which is the shopping centre. The shopping centre is a 3-storey building which opened in 1965, and which incorporates Hannibal House, a 16-storey office block. The shopping centre sits above a basement car park and servicing area accessed via a ramp which passes beneath the viaduct from Elephant Road. It contains a range of retail and leisure uses including a supermarket, bowling alley and bingo hall, and it provides access to the railway station. There are currently around 65 businesses within the shopping centre and Hannibal House. Outside the shopping centre there are approximately 35 market stalls at lower ground floor level in an area known as The Moat, and 3 retail kiosks at ground floor level. The Northern Line ticket hall is located in front of the shopping centre, facing Elephant and Castle and the Peninsula.
7. Numbers 26-32 New Kent Road comprise the Charlie Chaplin public house, the Coronet Theatre, a newsagents and a dental surgery; there is understood to be a flat above the Charlie Chaplin and the newsagents. Four railway arches are included in this part of the site, the northern two of which provide access / egress to the shopping centre basement, and two arches to the south of the railway station which are occupied by Distriandina, a Colombian restaurant, and Elephant Mall which incorporates a number of uses including retail sales, a hair salon and English classes.

West site

8. This part of the site measures 1.35 ha and is bound by St George's Road to the north, Elephant and Castle to the east, Brook Drive, Pastor Street and the Metropolitan Tabernacle (a church with a grade II listed façade) to the south, and Oswin Street to the west. The LCC building is a part 4-storey, part 16-storey building completed in 1962, with some extensions added thereafter. It includes a small parking area comprising parking spaces on the northern part of the site which are accessed from Oswin Street.

Details of proposal

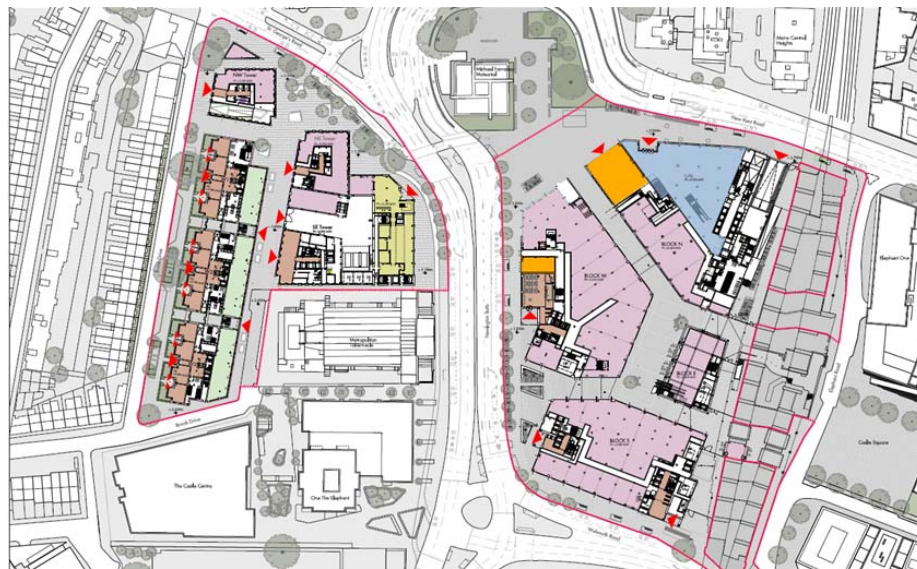
9. Elephant and Castle Properties Co. Ltd. has applied for full planning permission for a comprehensive, mixed use development on the site, following the demolition of all of the existing buildings and structures. The building heights would range from single storey to 35-storeys (maximum height of 124.5m AOD) above multi-level and single basements, and would provide a range of uses comprising retail (use Class A1-A4), office (use class B1), education (use class D1), assembly and leisure (use class D2), and 979 residential units (use class C3). There would be a new station entrance and station box for the Northern Line, together with a new means of access, public realm, landscaping, parking, cycle storage, plant and servicing areas, and a range of other associated and ancillary works and structures. The application is accompanied by an Environmental Statement (ES).
10. A breakdown of the existing and proposed floorspace is set out below:

Table 1

| Land use | Existing GIA sqm | Proposed GIA sqm | Net Difference GIA sqm |
|---|------------------|---|---|
| A1-A4 (A1 – retail, A2 – financial and professional institutions, A3 – cafes and restaurants, A4 – drinking establishments) | 15,132 | 18,234 This figure excludes the basement servicing area for the proposed shopping centre). | +3,102 |
| Flexible use A1-A4, B1 | 0 | 2,806 | +2, 806 |
| B1 (Business) | 10,669 | 2,806 (this forms part of the flexible A1-A4 or B1 space identified above) | Between -7,890 and -10,699 (total loss) depending on how much of the flexible space is occupied for B1 use. |
| C3 (Residential) | Not surveyed | 106,471 | Up to + 106,471 |
| D1 (Non-residential institutions) | 31,553 | 41,405 | +9,852 |
| D2 (Assembly / leisure) | 12,072 | 5,743 | -6,329 |
| Sui generis (LUL Station) | unspecified | 3,965 | |

East site

11. The development on this part of the site would be laid out as four plots, E1 to E4 which would be set around a new public square at the centre of the site, 'The Court'; this would be the main public / flexible event space for this part of the development. There would be two new streets leading to The Court; Station Route, which would connect the Peninsula with The Court and Elephant and Castle railway station, and Park Route which would connect Elephant and Castle with The Court. Railway arches 6 and 7 Elephant Road would be knocked through to connect Park Route with Elephant Park, which is a new park being delivered as part of the redevelopment of the Heygate Estate to the east of the railway viaduct. A third route would be created on the southern part of the site, connecting Walworth Road with The Court, running parallel with the railway viaduct. The plots would sit above a two-level basement which would be reached via a new access from New Kent Road. The basements would contain the London Underground station box, servicing areas, cycle parking, an energy centre, plant space, storage space, refuse storage and retail space.



Plan showing plot layouts

12. The shopping centre and leisure uses would predominantly be at ground, first and second floor levels within the plots which would be connected by footbridges, and there would be three residential towers above. A detailed breakdown of each plot is as follows:

Plot E1

13. This plot would be located on the northern part of the site with frontages to New Kent Road and the Peninsula, and set a minimum of 7m away from the railway viaduct. It would contain a 12-storey building (55.2m AOD) which would be the new home of the LCC which would move from its existing site on the opposite side of Elephant and Castle. It would incorporate the London Underground station box which would directly face the Peninsula, and which in the future would be fitted out by Transport for London (TfL) as a new Northern Line ticket hall. Part of the ground, first and second floors of this building facing Station route would comprise flexible retail space as part of the new shopping centre. Materials proposed comprise reconstituted stone, metal cladding, glazed curtain walling and black fritted glass.

Plot E2

14. This plot would be located on the western part of the site with frontages to the Peninsula and Elephant and Castle. It would contain 13,817sq.m GIA of retail space at ground, first and second floor levels, with the leisure space extending up to an equivalent of 6th floor level to accommodate a multi-screen cinema, potentially with up to 8 screens. Tower 1 would sit within this plot which would comprise 210 residential units and would be part 27, part 32-storeys high (maximum 124.45m AOD). The taller element would be located to the south, and it would contain a residential roof terrace at 28th floor level.
15. Materials proposed for this plot comprise brickwork, metal cladding and a metal screen to wrap around the cinema. The tower would be faced with brickwork, reconstituted stone, metal cladding for the window reveals, glazed balcony balustrades and a metal parapet frame at the top of the building. These materials would be used on all three towers on the east site.

Plot E3

16. This would be located on the southern part of the site with frontages to Elephant and Castle and Walworth Road, and set a minimum of 10m away from the railway viaduct. It would provide 4,709sqm (GIA) of flexible retail space at basement mezzanine, ground and first floor levels and would incorporate residential towers 2 and 3. These towers would provide 271 residential units starting at second floor level, and would be accessed from Elephant and Castle and Walworth Road. Tower 2 would be located closest to Newington Butts and would be 21-storeys high (80.25m AOD) with a roof terrace at 16th floor level. Tower 3 would be located next to the railway viaduct and would be 23-storeys high (86.425m AOD), with a roof terrace at 20th floor level.
17. Materials proposed for this plot comprise reconstituted stone, brick, glazing and metal elements.

Plot E4

18. This plot would be located on the eastern part of this site, set a minimum of 11m off the railway viaduct and would contain a 4-storey building (24.9m AOD) comprising 1,819sqm (GIA) of flexible retail and associated plant space on all levels, and a terrace on the top floor. There would be stairs and escalators on the southern side of the building, and would be connected to plots E1 and E3 by footbridges at first floor level. This building would be a glass and metal frame structure, with an exposed structural frame comprising steel columns and beams.
19. The knocking through of arches 6 and 7 Elephant Road would form part of this plot, and the new route would incorporate a small retail kiosk beneath arch 6 which would be constructed of metal cladding, with timber and glass bi-folding doors. The railway arches are owned by Network Rail and leased to the current occupiers. The applicant is pursuing an 'arch swap' with Network Rail, whereby the two arches which currently give access to the shopping centre and which are leased by the applicant would be given back to Network Rail in exchange for knocking through arches 6 and 7. At the time of writing there is no certainty as to whether this could be achieved, and this is considered in the transport section of the report. The arches which currently give access to the shopping centre have been included in the red line boundary for the planning application, although no details of works to be undertaken to them have been

provided.

Table 2: East site summary

| Land use | Quantity |
|---------------------------------|--|
| A1-A4 | 17,132 sqm |
| D1 | 41,405 sqm |
| D2 | 2,895 sqm |
| Transport infrastructure | 3,965sqm |
| Residential | 481 units (12 x studios, 174 x 1-beds, 232 x 2-beds and 63 x 3-bed |



East Site Elevations

West site

20. This part of the site would be laid out as three plots, W1, W2 and W3, which would sit either side of Pastor Street which currently terminates at the rear of the Metropolitan Tabernacle. Pastor Street would be extended northwards to meet St George's Road, effectively creating a new central street through the site. The west site would be served by a single level basement accessed via a one-way ramp at the northern end of Oswin Street. The basement would predominantly sit beneath plot W1 and would contain 34 accessible parking spaces, cycle parking, an energy centre, refuse storage and plant space. The west site would contain three residential towers.

Plot W1

21. This plot would be located on the northern-most part of the site closest to St George's Road and would contain two buildings; a single-storey retail pavilion facing St George's Road (9.35m AOD) and a 20-storey tower (W1) measuring a maximum of 71.9m AOD which would sit to the south of the retail pavilion. At ground floor level the tower would contain 312sqm (GIA) of retail space, a residential entrance from Oswin Street and the entrance to the basement, and there would be 96 flats above, from first floor level upwards. There would be a communal terrace at 15th floor level facing north and west.
22. The retail pavilion would be predominantly glazed, with a flat, metal roof. Tower W1 would be faced with brick set within a pale, reconstituted stone grid, with glazing and

grey metal in between. The top of the tower would be capped with a taller storey framed by masonry and decorative metalwork.

Plot W2

23. This plot would be located immediately north of the Tabernacle, facing onto Elephant and Castle, St George's Road and the Peninsula. It would be located 4m from the northern elevation of the Tabernacle, increasing to 15m owing to the stepped footprint of this neighbouring building. It would contain a mixed-use building including two residential towers (W2 and W3) which would provide a total of 286 residential units. The towers would be separated by communal amenity space at first floor level.
24. Plot W2 would incorporate a 3-storey cultural venue with frontages to Elephant and Castle and the Peninsula. It would provide 2,848sm (GIA) of floorspace and would have capacity for 500 people in what would be the main auditorium at first floor level, and a 300 person capacity in a smaller space on the ground floor. There would be 790sqm (GIA) of flexible retail space within this building, together with residential entrances, plant space and an internal service yard which would be accessed from Pastor Street.
25. Tower W2 would be located on the northern part of this plot and tower W3 on the southern part; both towers would be set back from the Elephant and Castle frontage to align with Pastor Street. Tower W2 would be 24 storeys high (84.7m AOD) with a communal roof terrace at 18th floor level facing north and west. Tower W3 would be 35 storeys high (119.76m AOD) with a communal roof terrace facing north and east, set back from the boundary with the Tabernacle.
26. Materials proposed within this plot comprise stone cladding for the cultural venue, and a pale reconstituted stone, brick, glazing and metal elements for the towers.

Plot W3

27. This plot would comprise an 8-storey building (24.8m AOD) in the form of a linear block located on the western part of the site, running parallel with Oswin Street. It is described in the submission as the Mansion Block, and at ground and upper ground floor levels it would have a back-to-back arrangement of uses, with residential units fronting Oswin Street and 2,860sqm (GIA) of flexible retail / office space fronting Pastor Street; the upper floors would be entirely residential, containing 116 residential units. The Mansion Block would be set back a minimum of 11m from Oswin Street (from the edge of the carriageway), and three inset loading bays and pocket parks would be provided along this street.
28. Materials proposed for this building comprise pale reconstituted stone, two contrasting bricks, and metal elements in a bronze colour.

Table 3: West site summary

| Land use | Quantity |
|--------------------|--|
| A1-A4 | 1,102 sqm |
| A1-A4, B1 | 2,860sqm |
| D2 | 2,484 sqm |
| Residential | 498 residential units (4 x studios, 142 x 1-beds, 296x 2 beds, 54 x 3-beds and 2 x |

Phasing

29. The development would be delivered in two broad phases over approximately nine and a half years. The submission advises that work on the east site would start first, with enabling works due to commence in March 2018. The ES assumes that the shopping centre would be demolished in 2018/2019, although there is no certainty on this at present as it would be dependent on vacant possession of the site and funding for the development being secured. Indicative phasing shows that the basement would be constructed first, followed by plots E1 to E4 in that order, with completion due in October 2022. In June 2023 the LCC would decant into their new building on the east site, with this process due to be completed by July 2023. Enabling works on the west site would commence in July 2023, with completion due in September 2027. Given the size and complexity of the proposed development there could be some changes to the proposed phasing.

Amendments

30. A number of amendments have been made to the application and additional / revised information submitted as follows:

Address

31. The application form gives the site address as Elephant and Castle Shopping Centre and the LCC site, and consultation on the application has been carried out on this basis. The applicant subsequently confirmed that 26, 28, 30 and 32 New Kent Road and railway arches 6 and 7 Elephant Road should be included in the east site address, although they were already included in the redline planning application boundary and supporting plans. The address has been updated on the Council's website to include these additional properties.

Correction to original description of development

32. *Phased, mixed-use redevelopment..... comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 34 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements.....* This change is simply to correct an error on the description of development given on the application form. No changes have been made to the height of the proposed development.

33. East site

- provision of a pedestrian route to the west of the viaduct next to plot E3, connecting Walworth Road with The Court;
- omission of 13 accessible car parking bays from the basement;
- revision to the proposed mix of cycle parking stands;
- provision of a community police office within the basement (note – the Police have subsequently confirmed that this is no longer required);
- changes to landscaping at the Elephant and Castle entrance to Park Route comprising the omission of one of three planters and the removal of bench seating from the two remaining planters;
- relocation of cycle parking within the public realm;

- reduction in the footprint of plot E4 at ground floor level;
- omission of indicative layouts to the Northern Line station box.

34. West site

- facing material for the proposed cultural venue changed from Corten steel to cast stone;
- relocation of the main entrance to the cultural venue from the east elevation of the proposed building to the north elevation, facing the Peninsula.

35. Additional information received

- submission of a Draft Local Business Support and Relocation Strategy;
- submission of a Basement Impact Assessment;
- submission of larger details showing the impact upon strategic view 23A.1;
- additional archaeology information;
- revised and additional accommodation schedules;
- additional wind microclimate information relating to the Metropolitan Tabernacle and amendments to public realm planters;
- additional drainage information relating to the Metropolitan Tabernacle;
- additional acoustic information;
- equalities addendum;
- affordable housing addendum;
- additional transport information relating to the east site servicing access;
- revised sustainability document;
- additional overshadowing information relating to West Square;
- additional waste management information;
- submission of verified views relating to the Metropolitan Tabernacle;
- additional daylight and sunlight information relating to the Metropolitan Tabernacle;
- EIA update letter;
- submission of updated bat activity survey;

Relevant Planning history

Elephant and Castle Shopping centre

36. A number of temporary planning permissions have been granted for change of use of vacant office space within Hannibal House to education use, together with change of use applications for units within the shopping centre and external kiosks.
37. 16-AP-0719 - Expansion of existing Cycle Hire Docking Station adjacent to Strata Tower to provide a maximum of 20 additional docking points. Planning permission was GRANTED in March 2016.
38. 15/AP/4122 Application type: Scoping Opinion (EIA) (SCP)
Request for EIA Scoping Opinion for the redevelopment of the shopping centre and London College of Communications site at Elephant and Castle.
Decision date 25/11/2015 Decision: Scoping Opinion - EIA Regs (SCP)

Pre-application advice

39. 14/EQ/0259 Application type: Pre-Application Enquiry (ENQ)
Redevelopment of shopping centre
Decision date 14/12/2016 Decision: Pre-application enquiry closed (EQC)
40. Pre-application advice was provided in advance of the submission of this application, details of which are held electronically by the Local Planning Authority. A number of meetings were held with the applicant and discussions centred around the design of the proposal, transport impacts including servicing, affordable housing, impacts upon existing businesses, and impacts upon the amenity of neighbouring properties.

Relevant planning history of adjoining sites

Skipton House, 80 London Road, Perry Library, 250 Southwark Bridge Road, Keyworth Street Hostel, 10 Keyworth Street.

41. 15-AP-5125 - Demolition of the existing buildings and creation of basement (plus mezzanine) and the erection of buildings ranging from Ground Floor plus 7 to ground floor plus 39 stories (maximum building height of 146.3m AOD) comprising retail uses (Use Classes A1/A3/A4) and fitness space (Use Class D2) at ground floor, multifunctional cultural space (Use Classes D1/D2/Sui Generis) at basement and ground floor levels, and office use (Use Class B1) and 408 residential units (Use Class C3) on upper levels, new landscaping and public realm, a publically accessible roof garden, ancillary servicing and plant, cycle parking and associated works. The Planning committee resolved to grant planning permission on 12th July 2016, but the s106 agreement has yet to be completed.

The Heygate Estate and surrounding land

42. 12-AP-1092 - Outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 2,300 (min) and 2,469 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works. Planning permission was granted, following the completion of a s106 agreement, on 27/03/2013.
43. A number of reserved matters applications have since been approved in relation to this outline planning permission and building works are well underway on site. Applications are predominantly residential-led, unless otherwise stated below:

| Application reference | Plot | Decision |
|-----------------------|-------------------------|-------------------------|
| 13/AP/3581 | Plot H6 | Granted, February 2014 |
| 13/AP/3582 | MP1 Public Realm | Granted, February 2014 |
| 13/AP/3583 | Plot H13 | Granted, February 2014 |
| 13/AP/3584 | Plot H10 | Granted, February 2014 |
| 14/AP/3438 | Plot H2 | Granted, December 2014 |
| 14/AP/3439 | Plot H3 | Granted, December 2014 |
| 15/AP/2572 | Plot H12 ("Energy Hub") | Granted, October 2015 |
| 16/AP/1697 | Park Phase 1 | Granted, August 2016 |
| 17/AP/0693 | Plot H4 | Granted, May 2017 |
| 17/AP/2269 | Plot H5 | Granted, September 2017 |

KEY ISSUES FOR CONSIDERATION

Summary of main issues

44. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use
 - Equality implications
 - Environmental impact assessment
 - Design, heritage assets and tall buildings including views
 - Density
 - Affordable housing
 - Mix of dwellings
 - Wheelchair accessible housing
 - Quality of accommodation
 - Trees and landscaping
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area
 - Noise and vibration
 - Transport
 - Air quality
 - Ground conditions and contamination
 - Water resources and flood risk
 - Sustainable development implications
 - Archaeology
 - Wind microclimate
 - Health Impact Assessment
 - Ecology
 - Socio-economic impacts
 - Planning obligations (S.106 undertaking or agreement)
 - Mayoral and Borough community infrastructure levy (CIL)
 - Statement of community involvement
 - Other matters.
45. An overall assessment of the merits of the proposal appears at the end of the report.

Legal context

46. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan, the Core Strategy, and the Saved Southwark Plan.
47. There are also specific statutory duties in respect of equalities and heritage assets which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

48. Planning Policy Designations (Proposals Map)

- Elephant and Castle Opportunity Area;
- Elephant and Castle Major Town Centre;
- Central Activity Zone;
- Proposal Site 39P 'Elephant and Castle Core Area' which identifies a large area of land at the centre of Elephant and Castle for comprehensive, mixed-use redevelopment (east site only);
- Archaeological Priority Zone;
- Air Quality Management Area;
- Area where a minimum of 35% affordable and 35% private housing is required.

49. The site sits within zone 1 and has a Public Transport Accessibility Level (PTAL) of 6b (excellent). It is located in Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding.

50. Elephant and Castle sits in the background of townscape view 23A.1 looking from the Serpentine Bridge in Hyde Park to Westminster (London View Management Framework 2012).

National Planning Policy Framework (the Framework)

51. National planning policy is set out in the National Planning Policy Framework ('NPPF') which was adopted on 27 March 2012. The NPPF focuses on a presumption in favour of sustainable development, of which there are three strands; economic, social and environmental. The core planning principles include, amongst others, the requirement to 'drive and support development'.

Section 1 'Building a strong, competitive economy'

Section 2 'Ensuring the vitality of town centres'

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'

National Planning Practice Guidance

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

53. The London Plan 2016

Policy 2.9 – Inner London

Policy 2.10 - Central Activities Zone – Strategic Priorities

Policy 2.11 - Central Activities Zone – Strategic Functions
Policy 2.12 - Central Activities Zone – Predominantly Local Activities
Policy 2.13 - Opportunity Areas and Intensification Areas
Policy 2.15 - Town Centres
Policy 3.1 - Ensuring Equal Life Chances For All
Policy 3.3 - Increasing housing supply
Policy 3.5 - Quality and design of housing developments
Policy 3.6 - Children and young people's play and informal recreation facilities
Policy 3.7 - Large residential developments
Policy 3.8 - Housing choice
Policy 3.9 - Mixed and balanced communities
Policy 3.10 - Definition of affordable housing
Policy 3.11 - Affordable housing targets
Policy 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.13 - Affordable housing thresholds
Policy 3.16 - Protection and enhancement of social infrastructure
Policy 4.2 - Offices
Policy 4.3 - Mixed use development and offices
Policy 4.4 - Managing industrial land and premises
Policy 4.6 - Support for and enhancement of arts, culture, sport and entertainment provision
Policy 4.7 - Retail and Town Centre Development
Policy 4.8 - Supporting a Successful and Diverse Retail Sector
Policy 4.9 – Small shops
Policy 4.12 - Improving Opportunities for All
Policy 5.1 - Climate Change Mitigation
Policy 5.2 - Minimising Carbon Dioxide Emissions
Policy 5.3 - Sustainable Design and Construction
Policy 5.5 - Decentralised Energy Networks
Policy 5.6 - Decentralised Energy in Development Proposals
Policy 5.7 - Renewable energy
Policy 5.8 - Innovative energy technologies
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 Wastewater Infrastructure
Policy 5.15 - Water Use and Supplies
Policy 5.21 - Contaminated land
Policy 6.9 - Cycling
Policy 6.10 - Walking
Policy 6.13 - Parking
Policy 7.1 - Building London's Neighbourhoods and Communities
Policy 7.2 - An inclusive environment
Policy 7.3 - Designing out crime
Policy 7.4 - Local character
Policy 7.5 - Public Realm
Policy 7.6 - Architecture
Policy 7.7 - Location and design of tall and large buildings
Policy 7.8 - Heritage assets and archaeology
Policy 7.11 – London view management framework
Policy 7.12 – Implementing the London view management framework

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

54. GLA Supplementary Planning Guidance (SPG)

Culture and Night Time Economy (April 2017 – draft)
Affordable Housing and Viability (November 2016 – draft)
Housing SPG (March 2016)
Central Activities Zone (March 2016)
Social Infrastructure (May 2015)
Town Centres (July 2014)
Sustainable Design and Construction SPG (April 2014)
Play and Informal Recreation (September 2012)
London View Management Framework SPG (2012)
Planning for Equality and Diversity in London (October 2007)

55. Core Strategy 2011

Strategic policy 1 - Sustainable development
Strategic policy 2 - Sustainable transport
Strategic policy 3 - Shopping, leisure and entertainment
Strategic policy 4 - Places for learning, enjoyment and healthy lifestyles
Strategic policy 5 - Providing new homes
Strategic policy 6 - Homes for people on different incomes
Strategic policy 7 - Family homes
Strategic policy 9 - Student 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

56. Southwark Plan 2007 (July) - saved policies

1.1 - Access to employment opportunities
1.4 - Employment sites outside the preferred office locations and preferred industrial locations
1.5 - Small businesses
1.7 - Development within town and local centres
1.11 - Arts, culture and tourism uses
2.1 - Enhancement of community facilities
2.2 - Provision of new community facilities
2.3 - Enhancement of educational facilities
2.4 - Educational deficiency - provision of educational establishments
2.5 - Planning obligations
3.2 - Protection of amenity
3.3 - Sustainability assessment
3.4 - Energy efficiency
3.6 - Air quality

- 3.7 - Waste reduction
- 3.9 - Water
- 3.11 - Efficient use of land
- 3.12 - Quality in design
- 3.13 - Urban design
- 3.14 - Designing out crime
- 3.15 - Conservation of the historic environment
- 3.16 - Conservation areas
- 3.17 – Listed buildings
- 3.18 - Setting of listed buildings, conservation areas and world heritage sites
- 3.19 - Archaeology
- 3.20 - Tall buildings
- 3.21 - Strategic views
- 3.28 - Biodiversity
- 4.2 - Quality of residential accommodation
- 4.3 - Mix of dwellings
- 4.4 - Affordable housing
- 4.5 - Wheelchair affordable housing
- 4.7 - Non self contained housing for identified user groups
- 5.1 - Locating developments
- 5.2 - Transport impacts
- 5.3 - Walking and cycling
- 5.4 - Public transport improvements
- 5.6 - Car parking
- 5.7 - Parking standards for disabled people and the mobility impaired

57. Supplementary Planning Documents (SPDs)

Development Viability SPD (2016)
 Technical Update to the Residential Design Standards SPD (2015)
 Section 106 Planning Obligations/CIL SPD (2015)
 Elephant and Castle Opportunity Area Planning Framework/SPD (2012)
 Affordable housing SPD (2008 - Adopted and 2011 - Draft)
 Residential Design Standards SPD (2011)
 Sustainable Transport SPD (2010)
 Sustainable design and construction SPD (2009)
 Sustainability assessments SPD (2009)
 Statement of Community Involvement (2008)

58. Conservation Area Appraisals

Elliott's Row Conservation Area Appraisal (2013)

The New Southwark Plan

59. Work is under way to prepare a New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark plan and the 2011 Core Strategy. The Council is currently undertaking informal consultation on the submission version of the NSP, with formal consultation likely to begin early 2018. It is anticipated that the plan will be adopted in 2018 following an Examination in Public (EIP). As the NSP is in draft form and is still subject to consultation, it can only be attributed limited weight at present.
60. Draft proposal site designation NSP46 within the NSP encompasses the east site, all of the railway arches along Elephant Road, and the LCC site. Required uses are

employment uses (identified as A1, A2, A3, A4, B1, D1, D2) – to at least the existing level of provision, open space (at least 15% of development site area), and a new tube station entrance. Other acceptable uses are residential and hotel uses. The indicative capacity is given as 2,570 new homes, 14,288sqm of employment uses, 24,307sqm of education floorspace for the LCC, and 6,060sqm of open space. The vision for the site includes the creation of a new 'Low Line' public route along the railway viaduct.

Draft New London Plan

61. Members should also be aware that the draft New London Plan was published on 30 November 2017. However, given that the plan process leading to the adoption of a new London Plan is only just beginning, this should be given very limited weight.

Principle of the proposed development in terms of land use

62. The NPPF sets out the Government's strong commitment to delivering sustainable development. It advises that there are three elements to sustainable development, economic, social and environmental. Sustainable development is the principal theme underpinning both London-wide and Southwark plan policies, where the regeneration of areas such as the Elephant and Castle is of high priority.
63. The site is within the Elephant and Castle Opportunity Area and the London Plan considers Opportunity Areas to be *"the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport accessibility. Typically they can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two, along with other supporting facilities and infrastructure"* (paragraph 2.58). Accordingly, policy 2.13 of the London Plan states that opportunity areas should seek to optimise residential and non-residential out-put and densities, provide necessary social and other infrastructure to sustain growth, and where appropriate, contain a mix of uses. Table A1.1 (Annex 1) of the London Plan gives an indicative employment capacity of 5,000 jobs and a minimum of 5,000 new homes to be delivered in the Elephant and Castle Opportunity Area over the plan period, and table A1.1 further notes that:

"The Area is undergoing major transformation with significant investment in housing and potential for new retail provision integrated with a more efficient and attractive transport interchange. There is scope to create a series of connected public open spaces complemented by environmental and traffic management improvements. Resolution of these and rail related issues are crucial to the successful redevelopment of this southern gateway to central London."

64. The site also sits within the central activities zone (CAZ), the strategic priorities and functions for which are set out in policies 2.10 and 2.11 of the London Plan; this includes enhancing and promoting the roles of the CAZ based on a rich mix of local and strategic uses.
65. At borough level, the Core Strategy identifies the Elephant and Castle Opportunity Area as one of the Southwark's growth areas where development will be prioritised. Strategic Targets Policy 2 seeks to deliver 4,000 net new homes and 5,000 net new jobs in the opportunity area, and around 45,000sqm of additional shopping and leisure space. The Council's vision for the opportunity area is set out in the Core Strategy, and the first paragraph of the vision reads as follows:

“Elephant and Castle has potential for redevelopment into an attractive central London destination. We will facilitate regeneration of the Elephant and Castle into a more desirable place for both existing and new residents. There will be excellent shopping, leisure facilities and cultural activities. London South Bank University and London University of the Arts will develop further as important centres of learning. Elephant and Castle will continue to be highly accessible from other places in Southwark and London...”

66. The saved Southwark Plan pre-dates the Core Strategy and was adopted in 2007. It identifies a number of proposal sites including 39P which includes the east site but not the west. It sets out a broad range of town centre uses which are required, including a range of D class uses, new homes, new retail, B1 floorspace and a highly efficient transport hub.
67. The Elephant and Castle SPD expands upon the Core Strategy and provides a framework to guide development over the next 15 years (until 2027). The opportunity area is divided into character areas and as stated the site forms part of the central character area. The strategy for this area is to:
 - Use development opportunities to redevelop or remodel the shopping centre and expand its appeal to a larger catchment.
 - Provide a range of unit sizes and affordable retail units which are made available to existing occupiers displaced by development from across the opportunity area.
 - Provide a range of arts, cultural, leisure and entertainment uses, including food and drink uses which make a positive contribution to the evening economy.
 - Support the growth of the London College of Communication.
 - Strengthen links between the shopping centre and Walworth Road ensuring that it becomes a key shopping axis.
 - Require developments to be mixed use and introduce active uses at ground level wherever possible.
 - Ensure that development opportunities provide opportunities for existing and future Small and medium sized businesses.
 - Transform leisure opportunities by building a new leisure centre.
 - Make significant improvements to the interchange between buses, tube and rail and increase capacity in the Northern Line station.
 - Replace subways with surface level crossings.
 - Improve east-west pedestrian connections by providing direct links through the shopping centre site and railway viaduct.
 - Take opportunities to activate and soften key public spaces around the central area and provide a new civic space at the front of the shopping centre.
 - Ensure all development and public realm enhancements are of the highest quality to provide a positive perception of the area.
 - Use tall buildings to signal the regeneration of the area, help define gateways into the central area and create an interesting skyline. Potential sites for tall buildings include the shopping centre and leisure centre sites. However, they must not detract from heritage assets, including the view of the Palace of Westminster from the Serpentine Bridge.
 - Provide the potential to link key sites, including the shopping centre and leisure centre, within a district CHP/communal heating network.
68. With regard to land use, guidance note SPD21 advises as follows.
69. A redevelopment/remodelling of the shopping centre will be supported. Proposals for

the shopping centre site should:

- Support the objective of consolidating the Elephant and Castle as a major town centre.
 - Improve the retail offer by providing a range of types of retail, including comparison goods floorspace.
 - Provide a range of unit sizes and affordable retail units which are made available to existing occupiers displaced by development.
 - Increase the number of employment opportunities on the site and ensure that there is no net loss of non-residential floorspace.
 - Provide a range of arts, cultural, leisure and entertainment uses, including food and drink uses which make a positive contribution to the evening economy.
 - Introduce residential use as part of mixed-use development where feasible.
 - Provide space for an increase in the capacity of the Northern Line ticket hall.
70. The above sets out the strong support for a high density, mixed-used development on this large brownfield site at all levels of planning policy. The proposed development would fully accord with the principle of accommodating large-scale development within opportunity areas, and would deliver many of the key objectives set out in the SPD for the central character area, and these are discussed below in the relevant sections of this report.

Provision of retail floorspace

71. The London Plan identifies Elephant and Castle as a district town centre; district centres are defined as typically containing 10,000-50,000sqm of retail, leisure and service floorspace. It notes that the centre has a high potential for growth, with the potential to change to a major town centre where retail, leisure and service floorspace is generally over 50,000sqm. Policy 2.15 of the London Plan 'Town Centres' sets out the strategic requirements for town centres including sustaining and enhancing the vitality and viability of the centre, accommodating economic and / or housing growth in appropriate locations, and supporting and enhancing the competitiveness, quality and diversity of town centre retail, leisure, employment, arts and cultural uses.
72. Strategic policy 3 of the Core Strategy 'Shopping, leisure and entertainment' already identifies Elephant and Castle as a major town centre owing to the potential increase in retail floorspace expected over the next 20 years. It advises that there is currently 69,000sqm of retail floorspace within the centre, and that the Council will enable the provision of around 45,000sqm of additional shopping and leisure floorspace at Elephant and Castle / Walworth Road, focusing on the provision of new non-food shopping and strengthening its role as a major town centre.
73. This is reinforced through the Elephant and Castle SPD, guidance note SPD1 of which advises that the Council will work with the landowner to transform the shopping centre through redevelopment or remodelling, supporting the introduction of new large 'anchor tenants' and promoting a wider mix of retail uses to strengthen the appeal of the town centre to a wider catchment.
74. There is currently 15,132sqm (GIA) of retail floorspace on the east site which includes the shopping centre, the railway arches, and the newsagents on New Kent Road. There are also approximately 35 market stalls and 3 retail kiosks outside the shopping centre. Concerns have been raised following public consultation on the application that no breakdown of the existing retail uses has been provided and that it not clear

whether the proposal would comply with saved policy 1.7 of the Southwark Plan which requires A class floorspace to be retained.

75. The proposal would deliver between 3,102 and 5,908sqm of additional retail floorspace within use classes A1-A4, depending on whether the flexible space were occupied by retail uses. It is noted that on the east site there would be around 1,500sqm less retail floorspace than existing, but this should be considered in the light of the proposed relocation of the LCC from the west site to the east site, taking up floorspace which could otherwise have been used for retail purposes. Moving the LCC to a more prominent and accessible location on the east site is considered to be a significant positive aspect of the scheme, and the improvements to the public realm and pedestrian permeability on the east site with the creation of two new streets are also noted. Across both parts of the site there would be an increase in retail floorspace which would be in accordance with the London Plan, the Core Strategy, the Saved Southwark Plan, and the Elephant and Castle SPD. Although figure 5 in the Elephant and Castle SPD identifies the west site as being predominantly for educational uses including halls of residents, all of the uses proposed on this part of the site would be appropriate town centre uses in policy terms.
76. The majority of the retail and leisure floorspace would be located on the east site within a new shopping centre. It would have excellent connections to retail coming forward on the redeveloped Heygate Estate and along Walworth Road, the retail frontage of which is being extended northwards towards the shopping centre to create a continuous retail street. The Elephant and Castle SPD seeks to reinforce the continuity of the retail frontage on Walworth Road, and the proposal would help to deliver this. New retail would also be provided on the west site and as this too forms part of the town centre, this would be acceptable in principle.
77. Responses to public consultation on the application suggest that the existing shopping centre could be refurbished rather than demolished and the site redeveloped. In reality however, refurbishment would be less likely to deliver the significant public realm improvements which the SPD requires in and around the site, or connections through it. Moreover, the existing shopping centre is dated and of a poor quality. There has been little investment in it in recent years, owing to the long term intention of the current and previous owners for a wholesale redevelopment of the site. The SPD anticipates significant regeneration as the best solution to the site.
78. The Elephant and Castle SPD advises that the proportion of shops which sell comparison goods (music, clothes, books etc.) at Elephant and Castle is very low compared to other UK town centres, and that it appeals to a fairly small catchment area. The SPD advises that in general, Southwark's town centres are not meeting the needs of the borough's residents. Only around 16% of available expenditure in the borough for comparison goods is actually spent in the borough, with many people travelling to the West End, Croydon and Lewisham to shop. Comparison expenditure in the borough has further decreased since the SPD was adopted, and a retail study completed on behalf of the Council in June 2015 (the Southwark Retail Study) advises that just under 50% of comparison goods spend is made outside the borough. The redevelopment of the site to include a new shopping centre presents an opportunity to claw some of this back, and although the uplift in retail floorspace would not be significant, the floorspace would be of a higher quality and could be designed to suit the needs of modern, comparison retailers.
79. Concerns have also been raised following public consultation that the lack of investment in the shopping centre has adversely affected trade and that it is being

deliberately run down. Whilst there may be some validity to this observation, the Council is not the landlord for the shopping centre, and is therefore very limited in what it can do to improve this situation. However, as set out in the equality implications section of this report it is recommended that measures to support the shopping centre and its traders prior to its closure be secured through the s106 agreement.

Retail impact and scale

80. Saved policy 1.7 of the Southwark Plan requires the impact of the scale, vitality and viability of new retail floorspace to be considered. It advises that in town centres the LPA will permit developments providing a range of uses including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment (Class B1) uses, where the following criteria are met:
- i. The scale and nature of the proposal is appropriate to the character and function of the centre and the catchment area it seeks to serve; and
 - ii. The proposal will not harm the vitality and viability of the centre; and
 - iii. A mix of uses is provided where appropriate; and
 - iv. Any floorspace currently in A Class use should be retained or replaced, unless the proposed use provides a direct service to the general public and the proposal would not harm the retail vitality and viability of the centre (where the proposal site is located within a protected shopping frontage, the proposal should comply with Policy 1.9); and
 - v. The proposal would not materially harm the amenities of surrounding occupiers; and
 - vi. Where developments which are likely to attract a lot of people are proposed, the site should be highly accessible by sustainable modes of transport; and
 - vii. The road network has sufficient capacity to take any additional servicing traffic generated by the proposal without causing adverse effects on the environment, traffic circulation, or air quality; and
 - viii. The development addresses the street, provides an active frontage on pedestrian routes and would not erode the visual continuity of a shopping frontage; and
 - ix. The proposal provides amenities for users of the site such as public toilets, where appropriate.
81. The Core Strategy and the Elephant and Castle SPD support the delivery of an additional 45,000sqm of retail and leisure floorspace in Elephant and Castle major town centre. Some 17,551sqm of retail floorspace has already been consented in the opportunity area and has either been completed or is under construction. This, together with the net increase on the application site would result in 26,321sqm of new retail floorspace within the opportunity area which would significantly strengthen the role of Elephant and Castle as a town centre in accordance with the Core Strategy and SPD vision.
82. Whether the 45,000sqm is still an appropriate quantum has been tested through the Southwark Retail Study which was undertaken on behalf of the Council as part of the evidence base for the NSP. The redevelopment of the shopping centre has been tested in terms of growth and its impact on surrounding centres and it is not anticipated that there would be any detrimental impact on the vitality and viability of other town centres as a result of the proposed development.

Location, size and mix of retail units

83. The location of the proposed retail units, predominantly in a new shopping centre on the east site including active retail frontages to Elephant and Castle and Walworth Road is considered to be acceptable. The retail on the west site would help to activate the Peninsula, St George's Road and the northern end of Oswin Street. The extended Pastor Street would be lined with active uses which would help to create a vibrant piece of townscape.
84. The retail units shown on the plans range from 30sqm to 776sqm, although they would be flexibly designed to enable the sizes to be modified to suit end-user requirements, and could include a large anchor store alongside smaller units.
85. Policy 4.9 of the London Plan 'Small shops' advises that in considering proposals or large retail developments the Mayor will and boroughs should, consider imposing conditions or seeking contributions through planning obligations where appropriate, feasible and viable, to provide or support affordable shop units suitable for small or intermediate retailers and service outlets and / or to strengthen and promote the retail offer, attractiveness and competitiveness of centres; the Mayor's Town Centre SPG defines small shops as those with a gross floor area typically up to 80sqm. There are currently 45 units within the shopping centre which are less than 80sqm.
86. Guidance note SPD1 of the Elephant and Castle SPD requires retail developments of over 1,000sqm to provide a range of shop and unit sizes, including affordable units. It requires at least 10% of new retail floorspace (GIA) be made available as affordable for small and medium-sized enterprises in the opportunity area which have been displaced as a result of development, new business start-ups or independent retailers (this is the SPD eligibility criteria). Suitable businesses should have 3 units or less, and rents should be discounted by not less than a total reduction of 40% below market rate averaged over a 5 year period. The SPD advises that a sequential approach will be adopted when considering affordable retail units, with the preference for them to be delivered on-site. If this is not feasible or viable then off-site provision should be considered. Where affordable units cannot be provided, the SPD advises that the Council will seek financial contributions through planning obligations to provide the mitigation necessary to support retail diversity in the town centre or the rest of the borough.
87. The proposed development would provide 18,234sqm of retail floorspace across both sites, resulting in a requirement for 1,823.4sqm of affordable retail space. There would also be 2,806sqm of flexible floorspace which could be used for retail and office purposes, and if it were all used for retail this would add a further 281sqm to the affordable retail requirement, taking the total to 2,109.4sqm.
88. The applicant does not propose to provide 10% on-site affordable retail space, and no information has been provided to demonstrate that it would not be feasible or viable. In this respect the proposal does not comply with the SPD guidance. The applicant instead proposes to provide 5% of the retail coming forward on the east site as affordable (857sqm), to make an in lieu of £753,384 to make up for the remaining 5% on the east site (based on the cost of delivering 857sqm of affordable retail space in Council-owned buildings in the opportunity area), and to provide 10% of the retail space coming forward on the west site as affordable. This approach would result in a total of 967sqm of on-site affordable retail space across both sites (or 1,248 sqm if the flexible space on the west site were used for retail purposes). Over both sites this would equate to 5.3% on-site affordable retail provision, which could increase to 6.8% with the west site flexible space included.

89. Concerns have been raised in response to public consultation on the application that because most of the proposed retail space would come forward on the east site, this approach would result in less on-site affordable retail space which is correct. The applicant's affordable retail proposal would fall short of expectations in the SPD, although there is considered to be an advantage in accepting an in lieu contribution in this instance because off-site affordable retail could potentially be delivered much more quickly than that which would come forward on the application site. This is considered further in the equality implications section of this report.
90. Clauses to secure an affordable retail strategy including its location, unit sizes and specification should be included in the s106 agreement. It is recognised that the on-site provision and in lieu contribution would not be sufficient to replace all of the small shops currently on the site, but within the wider opportunity area some 1,762sqm of affordable retail has already been consented. This comprises 411sqm in Elephant One and 1,351sqm on the redeveloped Heygate Estate. A further 153sqm would be secured at Skipton House following completion of the s106 agreement for that development. 81sqm of affordable retail has been provided at Strata and Dashwood House, although this has already been occupied by independent traders at the shopping centre.
91. With regard to the mix of units, the submission advises that the tenant mix for the proposed shopping centre would be heavily represented by convenience retailers, supported by modern fashion and comparison retailers. It would provide modern, fit-for-purpose retail space including facilities for click and collect, cafes and restaurants which would help to support the evening economy. To ensure that there would be an appropriate mix of A1-A4 uses a condition is recommended that a condition be imposed requiring 50% of the retail units to be used for A1 purposes, and an affordable retail strategy which should be secured through the s106 agreement could make provision for small units. A condition is also recommended requiring details of provision for public toilets to be submitted for approval. This is considered to be an appropriate site and development for such a facility, and the condition would address part ix of saved Southwark Plan policy 1.7.
92. Overall, notwithstanding that the affordable retail proposal would fall short of the Council's expectations in the Elephant and Castle SPD, the principle of providing additional retail space, its impact, scale and location are considered to comply with the provisions of the development plan. It would help to deliver a vibrant town centre and is welcomed.

Provision of D class floorspace

93. Paragraph 17 of the NPPF outlines the 12 core land-use planning principles that should underpin planning decision making and states this should '*deliver sufficient community and cultural facilities and services to meet local needs.*' Paragraph 27 recognises the role of cultural facilities in ensuring the vitality of city and town centres; and paragraph 70 states that in 'promoting healthy communities', planning decisions should '*plan positively for cultural buildings*' and '*guard against the loss of cultural facilities and services*'.
94. Policy 4.6 of the London Plan supports the enhancement of arts, culture, sport and entertainment facilities. It cross-refers to policy 4.7 of the London Plan which advises that these types of uses should be focussed on sites within town centres, and that they should be on sites with good existing or planned public transport, they should be accessible to all sections of the community including disabled and older people, and

should address deficiencies in facilities and provide a cultural focus to foster more sustainable local communities.

95. Policy 4 of the Core Strategy advises that there will be a wide range of well used community facilities that provide spaces for many different communities and activities in accessible areas. In the Core Strategy community facilities include medical and health centres, sports, leisure and recreation facilities, and facilities for the provision of education; these fall within use classes D1 (non-residential institutions) and D2 (assembly and leisure).
96. Saved policy 2.1 of the Southwark Plan advises that planning permission for a change of use from D class community facilities will not be granted unless the applicant can demonstrate that the facility is surplus to the requirements of the local community or that the replacement development meets an identified need, or that another locally accessible facility with similar or enhanced provision can meet the identified needs of the local community facility users. Although no change of use is proposed, this policy could be applied to proposals to demolish existing community facilities. Saved policy 2.2 of the Southwark Plan advises that planning permission will be granted for new community facilities provided they can be used by all members of the community, and they do not cause any loss of amenity to present or future occupiers; where a development would generate more than 20 vehicle trips at any one time, a Transport Assessment is required.
97. There is strong support in the Elephant and Castle SPD for new leisure uses. The vision for the opportunity area advises that there will be excellent shopping, leisure and cultural facilities, and Theme 1 of the SPD: Town Centre: Shopping, business and hotels seeks to improve the evening economy and the variety of the arts, cultural and entertainment offer by providing more cafes and restaurants as well as supporting leisure and cultural facilities.
98. At present there is 43,605sqm (GIA) of D class floorspace on the site which would increase to 47,148sqm, an increase of 3,543sqm which is welcomed. This would be acceptable in principle in relation to the town centre policies of the NPPF, the London Plan and Southwark's policies. It is recognised that there are changes to the leisure uses and a net reduction of leisure uses. Overall the D class floorspace increases but the leisure elements within that reduces. This is considered below against the aspirations of the SPD that leisure uses should be an important component of a town centre mix. The proposed new D class floorspace is set out below, and in order to ensure that it would be delivered, it is recommended that clauses be included in the s106 agreement requiring it to be completed before a proportion of the residential accommodation can be occupied. This is to ensure that there would be a vibrant, mixed use development as required by the Elephant and Castle SPD.

London College of Communications / education floorspace

99. The college serves over 5,800 full and part-time students and 454 (full-time equivalent) staff at its current home on the west site, and specialises in creative courses in fields such as journalism, publishing, films, television and sound, graphic communication and photography. It is an important asset to the opportunity area attracting large numbers of visitors in addition to the students, and forms part of a hub for the creative clustering which is apparent in the Elephant and Castle area. The college, together with London South Bank University which is located on London Road approximately 170m from the west site form Southwark's university quarter, providing excellent opportunities for learning and innovation.

100. Policy 4.10 of the London Plan advises that boroughs should give strong support to London's higher and further education institutions and their development, and strategic objective 1B of the Core Strategy 'Achieve educational potential' advises that Southwark will be a place that creates positive futures by building, redeveloping and improving educational facilities with good access for everyone. This is reinforced through strategic policy 4 of the Core Strategy and saved policy 2.4 of the Southwark Plan, the latter of which advises that planning permission will be granted for new educational establishments, especially in areas of demonstrated educational deficiency, provided opportunities are taken wherever possible to ensure that provision is made to enable the facility to be used by all members of the community.
101. The proposed development would deliver a new home for the LCC in a prominent position at the heart of the town centre. It would be closer to both tube stations making it more accessible for students, staff and visitors, and it would have excellent connections with the new Elephant Park. The proposed building has been designed in conjunction with the college to help to realise their ambitions for a new, modern and flexible educational facility in Elephant and Castle. The brief for the building includes making it more open and accessible to the local community, flexible space for exhibitions events and the Stanley Kubrick archive, and sufficient space to accommodate UAL's core university service at the site including its international language centre, training, conference and student union facilities.
102. The proposal would enable up to 500 college jobs which are currently undertaken at other UAL campuses across London to relocate to Elephant and Castle which is a significant positive aspect of the scheme. The building would incorporate a 3-storey exhibition space for student work and archive collections, and which could also be rented by the local community; it is recommended that this be secured through the s106 agreement.
103. The provision of this facility would help to secure the college's long-term future in the area, and is a significant positive aspect of the scheme. In order to ensure that there would be no loss of education floorspace during construction, it is recommended that a clause be included in the s106 agreement preventing the existing college from being demolished until / unless the new building is ready for occupation and has been handed over.

Proposed multi-screen cinema

104. The proposed cinema would be the main leisure offer within the proposed development. The Southwark Retail Study also considers demand for leisure uses until 2031, and advises that a significant proportion of cinema trips from residents in the borough (approximately 60%) 'leak' to other destinations; it advises that by 2031 there could be demand for 22 cinema screens in the borough. The socio-economic chapter of the ES advises that market research shows that there is significant demand for a 12-15 screen cinema in the catchment area of the proposed development.
105. At present the borough has 16 large cinema screens providing 3,735 cinema seats, together with three small, independent cinemas which are Roxy in Borough High Street, the Wave on Bermondsey Square, and East Dulwich Picture House on Lordship Lane; together these add a further 5 screens to provision in the borough. The proposal could add a further 8 screens which would meet the identified demand and help to retain more cinema trips in the borough.

106. The Elephant and Castle SPD seeks to increase the use of the area during the evenings and the proposed cinema would help to achieve this, and would complement the proposed food and drink uses within the new shopping centre.

Proposed cultural venue

107. The second element of the new D class floorspace is the proposed cultural venue which would be located on the west site. It would be a multi-functional space which would occupy a prominent position in the area, with a frontage to Elephant and Castle and facing the Peninsula. The ground floor would comprise a lobby with ticketing and reception desk, a 300 capacity event space and ancillary spaces which could be used as recording studios and rehearsal space. At first floor level there would be a foyer, bar and entrance to the main performance space which would have capacity for 500 people. This facility would be acceptable in land use terms and would activate this prominent corner of the site. It is considered that this would be a very positive addition to the heart of the town centre.
108. Although there would be an increase in D class floorspace as a result of the proposal, with the exception of the LCC, all of the proposed D class uses would be different from those which currently exist at the site. There would also be less leisure floorspace than at present. Overall D1 floorspace would increase from 31,533sqm to 41,405sqm, an increase of 9,852sqm through the new LCC building, and D2 floorspace would decrease from 12,072sqm to 5,743sqm, a decrease of 6,329sqm. The reduction in leisure floorspace has been raised as a concern during public consultation on the application, both in terms of the reduced quantum and the provision of a narrower range of leisure activities than currently exists. It is acknowledged that this reduction is a disadvantage of the proposal given the aspirations of the SPD that leisure should be an important component of the town centre uses. Concerns have been raised that many elderly people use the bingo hall and younger people and children the bowling alley, and that these facilities would be lost (this is considered in the equality implications section of this report).
109. The loss of each of the existing D class uses is considered in turn below.

Bingo hall

110. The bingo hall in the shopping centre occupies 5,299sqm of floorspace and has capacity for approximately 2,000 players. It is open seven days a week and a survey of the facility found that it is used by approximately 650 customers per day. There is one other bingo hall in the borough, Gala Bingo in Surrey Quays Leisure Park which is approximately 2.4 miles from the site. The Southwark Retail Study advises that the borough could support two or three bingo facilities, which suggests that the existing provision meets the current and likely future demand.
111. The proposed development does not include a new bingo hall, therefore the proposal is likely to result in a shortfall against predicted demand. Demand for the bingo use would therefore either have to be met by Gala Bingo at the Surrey Quays Leisure Park if there is capacity, or outside of the borough. Some other bingo halls are listed below, and there could be others further afield:
- Mecca Bingo in Camden (3.6 miles from the site);
 - Mecca Bingo in Catford (4.8 miles from the site)
 - Gala Bingo in Stratford (5.2 miles from the site) and

- Gala Bingo in Tooting (5.4 miles from the site).
112. The bingo hall is clearly a popular and well-used facility. An Equality Analysis undertaken by AECOM on behalf of the Council identifies that a high proportion of elderly people and people from Black, Asian and Minority Ethnic (BAME) backgrounds use the facility, and this is considered further in the Equality Implications section of this report.
113. Whilst the above is noted, there are not considered to be any development plan policy grounds for requiring the bingo use to be replaced. Although saved policy 2.1 of the Southwark Plan seeks to protect D class uses, it is worded in terms of requirements and need, rather than demand. Whilst there is clearly a demand for the facility, there is not a need for it in the same way that there may be a need for a dental or doctors' surgery. Comments have been raised during public consultation that the bingo hall is afforded protection under NSP policy 1, 'Social Regeneration'. However, as stated the NSP is in draft form and can only be attributed limited weight at present. The current wording of policy NSP1 would not in any event support retaining this use. Members are referred to the Equality Implications section of this report which identifies potential equalities issues which could arise from the loss of this facility.

Bowling alley

114. The Palace Superbowl within the shopping centre has 26 lanes and is open 11am to 11pm daily. A survey of the facility suggests that it is used by around 440 people per week, and the operator has advised that there are currently one hour waiting times for bowling at the weekends.
115. There is another bowling facility in the borough, the Hollywood Bowl which is also in Surrey Quays Leisure Park and has 28 lanes. The Southwark Retail Study advises that by 2031 there could be demand for 29 lanes and there are currently 54. As such the report concludes that the existing bowling facilities in the borough are more than adequate to meet demand for the foreseeable future. Following the loss of the bowling at Elephant and Castle there would only be 28 lanes, one short of the predicted demand. This is not considered to be a significant shortfall, although it is noted that people would have to travel further afield. However, with the improvements to the Northern Line ticket hall, travel to this alternative facility by tube should be easier.

Coronet Theatre

116. The Coronet Theatre is a 3-storey building which was constructed as a theatre in 1879. A review of its planning history reveals that it was converted to a cinema in the 1930s, and went on to be used as a nightclub in around 2000 following the granting of a lawful development certificate for that use (reference: 00/AP/1315). The building appears to have been operating as a nightclub ever since, and has a capacity of 2,800. It hosts around three events per month, and a review of its website for August this year listed four events which all appear to be club nights. The venue is operating on a short term lease which is understood to expire in January 2018.
117. Objections to the application on the grounds of the loss of the Coronet have been received from the Theatres Trust, the Cinema Theatre Association and neighbouring residents. Reasons for objecting include that the Coronet remains a viable and valuable operation, that cities need a range of facilities and venues, and that it is identified as one of only four remaining music venues in the area. The objections advise that the Council should be satisfied that there is no longer a demand for this

type or size of cultural facility in the area.

118. The Coronet is identified as a grassroots music venue in a 2015 GLA report 'London's Grassroots music venues rescue plan'. Grassroots music venues are given a broad definition in this document, which includes venues with a fixed or temporary stage, a defined audience space, sound booth, ticket hatch, equipment to facilitate live music, and employing people in roles such as sound engineers, bookers, promoters and stage managers. The rescue plan advises that between 2007 and 2015 London lost 35% of its grassroots music venues, and the plan is referenced in the Mayor's draft 'Culture and night time economy' SPG.
119. Nightclubs are classed as Sui Generis uses, which means that they do not sit within any particular use class; theatres are also classed as Sui Generis. Whilst there are no policies in the saved Southwark Plan or Core Strategy which specifically protect Sui Generis uses, there is strong protection at all levels of planning policy for a range of cultural, leisure and entertainment uses in town centres, and the NPPF definition of main town centre uses includes nightclubs and theatres. The Mayor's Central Activities Zone SPG advises that arts, cultural, tourism and entertainment activities are integral to the function and distinctive character of the CAZ and its mix of daytime, evening and night time uses. The town centre policies in both the Core Strategy and the Southwark Plan seek to provide a range of leisure uses, of which nightclubs form a part.
120. No information has been provided regarding the demand for this type and size of venue in the area, and the proposal does not include a replacement nightclub. The GLA in its stage 1 report notes that the venue is a large-scale and positive contributor to the local night time economy, and that its displacement is disappointing in some respects. The Theatres Trust considers that the Southwark Playhouse and a proposed 350 seat capacity auditorium in Skipton House should not be considered as mitigation for the loss of the Coronet, because Southwark Playhouse replaces an existing theatre and is only in the area on a temporary basis, and the space planned for Skipton House has no clear purpose, no operator, and could not be a live music venue of the nature of the Coronet. The Trust considers that any replacement should be a fit-for-purpose facility of an equivalent size, and that the proposed cultural venue would not be a suitable replacement.
121. The proposed cultural venue would clearly not be a replacement for the existing nightclub in terms of its size, and the applicant has advised that it is not intended as such in any event. It would be of a much smaller scale than the Coronet, and would incorporate music rehearsal and recording studios with events every night, to complement the creative uses at the LCC.
122. The GLA stage 1 report concludes that the benefits arising from the proposal including the delivery of a new shopping centre, a new building for the LCC, new leisure floorspace, transport infrastructure and a significant quantum of new housing would outweigh the loss of the nightclub. It advises that the proposed uses would complement other night time uses coming forward in the vicinity including at Skipton House and a new theatre on Newington Butts as part of the 360 Tower development. Whilst it is recognised that the loss of this facility would impact upon the local night-time economy, the proposal would provide a modern leisure offer in the form of a cinema and cultural venue, and the lower floors of the LCC building would be publically accessible and capable of delivering a cultural function for the area. The nearest alternative nightclub is Corsica Studios, an independent arts, live music and club venue which has operated from Arches 4 and 5 Elephant Road for the last 15 years and has capacity for 500 people. Corsica Studios is also identified as a

grassroots music venue in the Mayor's draft Culture and night time economy SPG, and although not a grassroots venue, the Ministry of Sound nightclub is approximately 320m from the site on Gaunt Street.

123. In the event that planning permission is granted, the Theatres Trust, supported by the Cinema Theatre Association, has recommended that a number of obligations be secured in relation to the proposed cultural venue. These include that the operator be involved in its design, the implementation of a management plan detailing the programme and minimum number of public facing performances, provision of funding for fitting the venue out, that the bar and ancillary spaces be managed by the venue operator, and that the venue is leased at an affordable rent.
124. The intended phasing for the proposed development is such that the proposed cultural venue would not come forward for at least 8 years, therefore it is not considered to be appropriate to expect an operator to have been secured at this stage. The applicant has advised that the design of the building has been informed by dialogue with prospective occupiers as well as in-house specialists at the project architects (Allies and Morrison) who have experience of working on similar projects across London including the Festival Hall. The servicing of the venue, access, layout and technical and performance requirements have all been taken into account and reflected in the plans, but it has been flexibly designed so that changes could be made to suit end-user requirements in the future.
125. It is however, considered appropriate to secure the provision of a Cultural and Operational Management Plan, and a clause to this effect has been included in the draft s106 agreement; this could include details of the management of ancillary facilities such as the bar. Regarding fit-out costs and reduced rents, the applicant has advised that these have not been factored into the scheme viability; as set out below in the affordable housing section of this report, the applicant's offer in respect of affordable housing and other contributions is considered to be the maximum that the development could viably support.
126. Although there would be no loss of a theatre arising from the proposed development, there are other theatres in the opportunity area. This includes Southwark Playhouse which is approximately 330m to the north-east on Newington Causeway, although it is noted that this is a temporary location and it is understood that the theatre will move back to its former home in London Bridge. In addition there is a 713sqm theatre being delivered as part of the 360 Tower development on the site of the former London Park Hotel; this is some 200m to the west of the Coronet.

Dental surgery

127. This is located at 32 New Kent Road is understood to have 3 dentists. Policy 3.16 of the London Plan seeks to protect and enhance social infrastructure, and advises that proposals which would result in the loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted; it requires the suitability of the space for other forms of social infrastructure to be considered. This is reinforced through saved policy 2.1 of the Southwark Plan.
128. The proposed development does not include any replacement floorspace for the existing dental surgery (it is noted that paragraph 4.47 of the ES erroneously advises that a health centre is proposed in plot W2). Chapter 7 of the ES which considers socio-economic impacts advises that in 2014-2015 there were 19 dentists and 9 dental

practices within 1.5km of the site. Of these practices, eight were accepting both fee paying and fee exempt patients. The ES advises that the patient per dentist average in Southwark is 20% lower than the national average and 6% lower than London as a whole, suggesting that there is a degree of surplus capacity. In light of this officers raise no objections to the loss of the existing dental surgery in this instance, particularly given the significant increase in D class floorspace overall.

The School of Management Sciences and a language school

129. Are understood to be located in Hannibal House and railway arch 7 Elephant Road respectively. As stated the proposal would result in additional education floorspace on the site, and it is intended that the LCC international language school would be incorporated into the new LCC building.

Community organisations

130. The ES advises that there are five community organisations on the east site, although only one of these, Community Action Southwark Volunteering Centre which is located in the shopping centre, is fully accessible to the public. The other four are described in the ES as non public-facing offices. Again, although no replacement floorspace is proposed for these organisations, the overall quantum of D class floorspace would increase which in policy terms would be acceptable. The ES advises that Community Action Southwark has plans to relocate less than a mile away. The remaining four organisations include charities, and these are considered in the equality implications section of this report.

Conclusion on D class floorspace

131. Although there would be a reduction in leisure floorspace on the site and a narrower range of leisure facilities, the overall quantum of D class floorspace would increase. The bingo and bowling are clearly very popular facilities, but in land use terms there is no requirement to replace these specific uses and there is not considered to be any conflict with the development plan in this respect. That said it is acknowledged that the reduction in leisure is a disadvantage when assessed against the aspiration of the SPD that leisure should be an important component of the town centre uses. There would also undoubtedly be temporary, adverse effects on leisure provision during the construction period following the demolition of the existing facilities, but this would be temporary in nature.

Office space (use class B1)

132. Policy 4.2 of the London Plan seeks to consolidate and strengthen the diverse office markets in London by promoting their competitive advantages, focussing new development on viable locations with good public transport, and enhancing the business environment through mixed use redevelopment.
133. Strategic policy 10 of the Core Strategy seeks to protect existing business floorspace in certain locations including the CAZ, town centres and action area cores, and proposal site designation 39P in the saved Southwark Plan requires a minimum of 45,000sqm of B1 space within the opportunity area. Saved policy 1.4 of the Southwark Plan also affords protection to existing business space in certain locations, but it also allows it to be replaced with A class or other town centre uses where sites are in a town centre. This is repeated in policy SPD4 'Jobs and Businesses' of the Elephant and Castle SPD.

134. There is currently 10,699sqm (GIA) of office floorspace in Hannibal House, approximately 2,000sqm of which (9 office suites) are vacant. The submission advises that much of it is of poor quality and dated, does not suit modern occupiers' space standards or layout requirements, and would require significant upgrading to meet modern requirements. The office space supports FTE 638 jobs.
135. The proposed development would include 2,860sqm of flexible floorspace on the west site which could be used for A1-A4 and B1 purposes. The submission advises that it would be flexibly designed to support new business and potential spin out companies from the LCC, and the applicant has advised that up to 10% of any new B class floorspace on this part of the site would be affordable. This would use the same SPD definition as for affordable retail, and would be available to small and medium businesses within Hannibal House which would be displaced, new business start-ups, registered charities and businesses which employ less than 10 staff. Concerns have been raised during public consultation that the proposal would only provide *up to* 10% of this space as affordable, but as this is not a policy requirement there is no scope to require that 10% be provided.
136. If all of the flexible space were used for B1 purposes there would be a loss of 7,809sqm of B1 floorspace as a result of the proposal. If it were all used for retail purposes there would be a total loss of office floorspace on the site, although it is noted that the LCC building would incorporate an element of office floorspace as the new UAL headquarters. However, the proposal would provide 83, 616sqm of new town centre uses comprising retail and D class floorspace, significantly more than the existing office space. The uplift in town centre uses would be 15,760, also well in excess of the existing office floorspace. As such the loss of the office space would be permissible under saved policy 1.4 of the Southwark Plan, no loss of B class floorspace s106 contribution would be required. As NSP46 includes education and retail as employment space, there would be no conflict with this draft policy either.
137. Notwithstanding the above, proposal site designation 39P does require 45,000sqm of B class floorspace within the designation area and currently only 2,959sqm has been completed or consented. However, more widely, 19, 367sqm of B1 floorspace has been completed or consented in the opportunity area since it was designated in 2004. There is also a resolution to grant planning permission for a further 28,638sqm of B1 floorspace at Skipton House which would bring the total to 50,964 of completed or consented B1 floorspace in the opportunity area. Based on employment densities this could support around 4,000 jobs, a significant contribution towards the 5,000 new jobs given in the London Plan as the indicative employment capacity for the opportunity area.

Provision of residential units

138. Section 6 of the NPPF sets out the government's approach to the delivery of significant new housing including a plan-led approach based on a sound evidence base. There is a pressing need for housing across London, and policy 3.3 of the London Plan supports the provision of a range of housing types. It sets the borough a minimum target of 27,362 new homes between 2015-2025, and as stated table A1.1 (Annex 1) of the London Plan sets a minimum requirement for 5,000 new homes in the Elephant and Castle Opportunity Area. Strategic policy 5 of the Core Strategy reinforces the London Plan policy, and requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas.

139. There are currently three residential units on the site, one above the Charlie Chaplin public house, one above the newsagents and a flat within the Metropolitan Tabernacle. Concerns have been raised during public consultation that the proposed development would be too focussed on residential use, to the detriment of the provision of other uses including retail and leisure. Concerns have also been raised that planned and consented developments in the opportunity area would already provide in excess of 5,000 new homes, suggesting that the regeneration of the area is not being plan-led.
140. The proposed development would provide 979 residential units in a highly accessible location, and on a brownfield site at the heart of the opportunity area which is a focus for new development. 979 homes equates to 36 % of the borough's annual housing target and 20% of the minimum target for the opportunity area, a significant contribution to the borough's housing stock.
141. 5,650 new dwellings have either been constructed or consented in the opportunity area since it was designated. The London Plan sets 5,000 new homes as a minimum number which should be achieved or exceeded, and there is an ongoing need for new housing. There would be an increase in retail and D class floorspace as a result of the proposal, therefore it is not considered that the level of residential proposed would be to the detriment of the delivery of other town centre uses. The proposal would deliver a lively, mixed-use development including a significant quantum of much needed new housing in the heart of Elephant and Castle, including affordable housing. Moreover, the GLA stage 1 report notes that 'The proposal includes an excellent mix of uses for this part of the CAZ – including office, housing, educational and leisure space' (paragraph 23).

Provision of transport infrastructure

142. The proposed development would include the construction of a station box which would become a new ticket hall for the Northern Line. The station is currently served by two lifts and experiences passenger capacity problems as noted in the Elephant and Castle SPD. The SPD vision for the opportunity area includes a highly integrated and efficient public transport hub including an improved Northern Line station, with a new ticket hall and improved access to platforms. The inclusion of a station box to facilitate this would comply with guidance note SPD1 'Land uses' which requires the development to provide space for an increase in the capacity of the Northern Line ticket hall, as well as policy SPD22 'Transport and movement'. As such this would be acceptable in principle and is welcomed.

Land use conclusion

143. The land uses within the proposed development would deliver a number of the key development plan objectives for the area. This includes an increase in retail floorspace, with leisure and cultural facilities through the provision of a new shopping centre, a new multi-screen cinema and a cultural venue venue (albeit that there is a net reduction in leisure as discussed above). The SPD vision advises that London South Bank University and the London College of Communications will develop further as important centres of learning, and the new building for the LCC on the east site would help to facilitate this; the investment by the college within the heart of the opportunity area is seen as a significant positive aspect of the proposed development and would contribute to the vibrancy of the town centre. A significant quantum of new housing would be delivered which would comply with the London Plan which seeks to deliver a minimum of 5,000 new homes within the opportunity area, and the proposal

would facilitate the delivery of a new ticket hall for the Northern Line. Overall it is considered that the mix of uses proposed would comply with the development plan and the SPD vision for the opportunity area (notwithstanding the reduction in leisure uses discussed above), and would help to strengthen the role of Elephant and Castle as a major town centre.

144. It is recognised that there would be a temporary loss of retail, leisure and office space until the east site is completed, which would result in temporary, adverse impacts to local residents. The site is however, in close proximity to shops and services along Walworth Road including East Street Market, and is very close to the new Castle Leisure Centre which provides fitness and leisure opportunities. Construction management plans would need to ensure that people could safely access these facilities during construction, and the equality implications section of this report sets out how affordable retail space could be delivered close to the site which would provide shopping provision prior to the completion of the new shopping centre.

Equality implications

Legal context

145. The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender reassignment, pregnancy and maternity, race, religion, or beliefs and sex and sexual orientation. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
146. This section of the report examines the impact of the proposal on those with protected characteristics and with a particular focus on the Council's legal duties under s.149 of the Equality Act 2010. A range of issues are discussed below. One particular issue is the displacement of existing businesses. The proposed development would require the demolition of all the existing buildings on the site. With the possible exception of arches 6 and 7 Elephant Road, the landlocked nature of the east site and infrastructure constraints mean that it would not be possible for the demolition to be phased in such a way that businesses could continue to operate following demolition and construction work. As such, all of the existing businesses would have to relocate or cease prior to demolition works commencing. This raises a number of issues which are discussed in detail below along with other equality issues.

Available material

147. A number of documents have been submitted with the application which are relevant to equality implications, including the ES, the applicant's Equalities Statement and

Addendum and a draft Local Business Support and Relocation Strategy. Also of relevance is the Council's own Equality Analysis dated June 2016. This is based upon two surveys. The first was a survey of the existing businesses on all of the land within the east site including the shopping centre, Hannibal House and the market stalls, together with 15 railway arches to the east of the site which it advises form part of the site (only 4 of the arches form part of the application site). The second survey was of visitors to and users of the site, and both surveys were undertaken between 4th January and 9th February 2016. All businesses within the survey area were contacted to arrange interviews, and 86 businesses took part, including from Hannibal House, market stall holders and the railway arches. For visitors to and users of the site, an on-street survey was undertaken and 502 members of the public who were stopped at random participated. The survey found that 93% of business owners who responded to the survey were from Black, Asian and Minority Ethnicities (BAME). Within the shopping centre approximately 70% of the businesses are national chains and 30% are independents. All of the businesses within the site but outside the shopping centre are independents and there is a mix of charities and short-term office space in Hannibal House.

148. A number of consultation responses raise equality implications as concerns, and these too have been taken into account. The consultation responses raise concerns that no relocation / trader support strategy was submitted with the planning application (a draft strategy has subsequently been submitted), and that the applicant's Equalities Statement is insufficient and does not recommend any mitigation measures, inadequacies regarding a proposed database of relocation opportunities and lack of clarity regarding which businesses would be eligible for support. It is noted that Southwark Law Centre and the Elephant Amenity Network consider that the Council's Equality Analysis is not sufficient because it only includes the shopping centre, but that is not the case. As set out above it included all businesses within the east site red line including Hannibal House and the market stalls, and actually included a number of railway arches which do not fall within the red line. Officers are therefore satisfied that the scope of the analysis is acceptable. These groups have also raised concerns that a 9th May 2017 cabinet report entitled 'Elephant and Castle Shopping Centre Equalities Analysis and Mitigation Projects' incorrectly identifies the number of businesses in the shopping centre as 86, and does not include other parts of the site. There is indeed an error in the Cabinet report. There were 86 respondents to the equality survey (not 86 tenants), and this included six from Hannibal House, 18 from market stall holders and 9 from tenants of the railway arches.

Affected groups

149. Impacts upon the following groups sharing protected characteristics have been identified (NB: this does not include impacts regarding loss of the bingo hall, which is considered separately below):
- **Age** (older business owners who may find it difficult to relocate and impacts upon young people arising from the displacement of the Young Stroke Survivors charity)
 - **Race** (impact upon existing businesses, their employees and customers, and displacement of the Kurdish and Middle Eastern Women's Organisation)

Race

150. There is a high proportion of business owners, together with their employees and

customers from Black, Asian and Minority Ethnic (BAME) backgrounds; people of Latin American, Black African, Black Caribbean and Asian origin would be most vulnerable to the effects of the loss of their existing businesses premises.

Impacts on existing shops and businesses

151. This could include temporary effects during relocation, and the effects of changes to clustering of businesses offering services to a common customer set.
152. The Council's Equality Analysis advises that many respondents were unsure about the future affordability of business units which would be provided in the proposed development, and felt that they had received inadequate information about it including when it would start and how long it would take. The proposed development could impinge negatively on the ability of BAME business owners to run their business successfully for reasons including commercial rents in the proposed development being higher than existing rents, less suitable units for the types of businesses which they operate (especially market stalls), and they may be less engaged in the redevelopment process.
153. A business survey undertaken confirms that there is a strong desire among business owners across all ethnic groups to continue operating their businesses following the redevelopment of the shopping centre. The analysis notes that confidence about their ability to return to the new shopping centre is low, and the analysis assumes that with the exception of LCC, it is likely that the majority of existing businesses on the site would relocate elsewhere.

Impacts upon market stall operators

154. Market stall operators may experience temporary or permanent closure or disruption to business operations, financial or other barriers to re-opening at the new development or in the wider area.

Impacts on employees of existing businesses

155. Existing employees may experience temporary or permanent loss of income and / or employment until relocated, and/or where their employer closes/downsizes/relocates elsewhere.

Impacts on goods and services

156. The shopping centre provides a range of culturally diverse shops that provide convenience goods and services and acts as a hub to cater to a range of BAME groups, as well as the general public. The proposed development would result in the displacement of BAME owned businesses which comprise the majority of SMEs on the site, and which provide goods or services which serve the needs of people from a shared ethnic background. The Council's Equality Analysis identifies potential concerns about how businesses would retain their existing customer base if they were required to move out of Elephant and Castle, particularly those which have been at the site for a long time. The analysis advises that existing BAME groups currently feel well catered for in terms of access to culturally specific goods and services within the shopping centre, and that the proposed development would impact upon this. It does note however, that the local area provides a diverse mix of shops that provide a wide range of goods and services, and that the site is within easy walking distance of Walworth Road where similar services can be found.

Impacts on customers of existing shops / businesses owing to the loss of these facilities

157. Negative effects could include changes to access to culturally-specific goods and services, associated sense of belonging and cultural connections. In terms of specialist provision for customers, the equality analysis again notes that similar services and accommodation are available along Walworth Road.

Impacts on users of particular facilities, including the Coronet Theatre, passport interview office, Language Centre, the London School of Management and charities in Hannibal House (bingo and bowling are considered separately below)

158. The Council's Equality Analysis advises that users of these facilities could be adversely impacted as a result of the proposed development, particularly where there are limited comparable alternatives within a reasonable travel distance. There are two charities on the east site which provide help to those suffering from the effects of crime and young people affected by strokes. The analysis advises that closure/relocation of these charities may give rise to health inequalities to those with protected characteristics, for instance BAME groups or young people. Where usage patterns reflect patterns in protected characteristics this may give rise to equality effects which may include physical and mental health inequalities.
159. The equality analysis advises that there are 61 music and nightclub venues within a mile of the Coronet, and consequently concludes that there is a reasonable provision of these facilities in the locality. The nearest government passport office is at Victoria, some distance from the site. There are 9 language schools which offer English and other language tuition within a mile of the existing facility, and the UAL international language centre would be located in the new LCC building on the site.

Potential mitigation

160. As stated, the applicant has submitted a Draft Local Business Support and Relocation Strategy, together with an addendum to the Equalities Statement which sets out how the measures in the draft strategy would help to secure positive and mitigate against negative equality impacts. The applicant's mitigation measures are largely based on a 9th May 2017 cabinet report entitled 'Elephant and Castle Shopping Centre Equalities Analysis and Mitigation Projects'. Concerns have been raised following public consultation on the application that traders have not been involved in the preparation of the draft Local Business Support and Relocation Strategy. Whilst this is noted, re-consultation was undertaken on the draft document once it was received, and a number of changes made to it in response to feedback received. As set out below, this includes increasing Tree Shepherd funding to support all independent businesses within the red line, confirming contribution amounts for a relocation fund and off-site affordable retail contribution, and translation of a database of relocation opportunities into other languages if requested.
161. Concerns have been raised following public consultation that the applicant's draft Local Business Support and Relocation Strategy does not comply with policy P38 in the draft NSP or guidance in Appendix 1 of the draft Old Kent Road Area Action Plan. However, both are draft policies and can only be attributed limited weight at present, and Elephant and Castle has its own opportunity area planning framework / SPD. Concerns have also been raised that it does not refer to the Elephant and Castle Traders' Charter.

162. At its meeting on 30 January 2007 the Council's Executive received a report concerning business continuity at the centre and affirmed the Council's willingness to negotiate with other parties to develop a "business continuity charter". The intended purpose of the proposed charter was to guide the relevant stakeholders on the regeneration of the centre. Not long after that Executive recommendation the financial crash of 2007 occurred that resulted in a severe and prolonged down turn in the property market. Against this background the proposed charter was not developed any further by the parties and ten years later things have moved on:
- There is a different shopping centre owner that was not party to 2007 discussions;
 - The centre is to be redeveloped independently to the former Heygate Estate; in 2007 a single regeneration was envisaged;
 - The nature of the regeneration is very different it now includes a new Northern Line station and the University of Arts London site; and
 - Other major developments in the immediate area have now been completed.
163. It is therefore considered appropriate to adopt a fresh approach to the impact that planning application would have on the existing traders. The proposed mitigation measures do however, draw on some of the earlier proposals as they include an independent advisor, affordable retail units and a database of available premises as set out below.
164. As stated, age and race have been identified as potential groups which could experience adverse equality impacts. The same support would be available to help people within both of these groups, therefore the proposed mitigation set out below covers both of these protected characteristics.

Appointment of an independent business advisor

165. The applicant's draft local business support and relocation strategy provides details of the appointment of Tree Shepherd, an independent business advisor. This responds directly to a recommendation in the Council's Equality Analysis that an independent panel should be appointed to provide advice on matters relating to relocation and business support. It advises that existing shopping centre tenants should be involved in the selection and appointment of panel members.
166. Tree Shepherd has been appointed by and reports to the Council, but is funded by the applicant. The Tree Shepherd appointment was initially on the basis that they would provide support to 25 businesses, and a number of responses following the re-consultation exercise queried the basis for this and why all businesses could not be included.
167. The 25 businesses is based on those businesses currently operating in the shopping centre which have fewer than three units, and which were operating there before it was purchased by the applicant in 2013. The rationale for this was that those who moved into the shopping centre after this time did so in the knowledge that it would be demolished, and were only granted short leases. However, this approach has subsequently been amended. The applicant has agreed to provide additional funding so that Tree Shepherd support would be available to all businesses within the red line, including those within the shopping centre, Hannibal House, the railway arches, the market stalls and kiosks. Tree Shepherd has been based at unit 231 of the shopping centre since August this year and the scope of services is as follows.

168. Phase 1 (pre-implementation)

- To produce information packs (in English and Spanish) outlining the support on offer;
- To publicise and hold a series of interactive information workshops;
- To make introductory door-to-door visits to businesses
- To match businesses with advisors for one-to-one confidential advice sessions;
- To conduct an initial business health check and needs analysis with each trader;
- To manage a database of commercial property available in the local area and publicise this to traders;
- To build trust and create well-attended events that act as a forum for the Shopping Centre Management Team and tenants to work together;
- To staff unit 231 Monday to Friday, 9am to 5pm to use as a base for walkabouts, to give traders the opportunity to drop in for informal visits, holding confidential one-to-one advice sessions, and running small group business workshops.

169. Phase 2 (post-implementation)

- To continue with phase 1 activities;
- To establish and manage a panel of specialist professional advisors including solicitors, surveyors and accountants whose services are available to tenants;
- To assist traders to review and assess alternative business models and / or premises options;
- To support the Council in administering the relocation fund.

170. Throughout the project

- Clear communications;
- Continuing needs analysis and personalised tailored support.

171. The Tree Shepherd appointment would support all existing businesses within the red line planning application boundary, which includes older business owners, business owners from BAME backgrounds, and charities operating from Hannibal House. Offering support to these businesses would in turn help to support their employees. Although the traders were not directly involved in the appointment which has been raised as a concern by Southwark Law Centre and Elephant Amenity Network, Tree Shepherd project staff were introduced to traders individually prior to their appointment, as part of the selection process.

172. It is difficult to be precise as to the exact number of BAME owned businesses which would be affected by the proposed development, because if permission is granted, existing businesses could cease or relocate of their own accord prior to closure of the shopping centre. Tree Shepherd are in place now and can support the businesses through this process, and they would remain in place for a year after the closure of the shopping centre to offer ongoing support.

173. Concerns have been raised that information given to Tree Shepherd by existing businesses may not be confidential because they are funded by the applicant. However, as set out above in relation to the services which Tree Shepherd provides, all information is treated as confidential.

Database of relocation opportunities

174. The Council's Equality Analysis recommends that the developer prepares a relocation strategy, together with a database of relocation opportunities within the area, with the objective of enabling businesses which wish to do so to relocate to alternative premises in Elephant and Castle. As stated a draft Local Business Support and Relocation Strategy has been submitted. It is not yet known when the shopping centre would close, and it is recommended that the strategy be implemented at least 6 months prior to its closure. The s106 agreement should obligate the developer to notify the Council and traders of when the shopping centre would close, and to provide evidence to the Council of a valid contract for the redevelopment before it can be demolished.
175. The draft strategy details a proposed database of relocation opportunities which would be set up and maintained by the developer and would be available to businesses via Tree Shepherd.
176. Details would include vacant retail units in the opportunity area, affordable retail units being delivered through other development sites, and market stall opportunities including in the new market square to the east of the site and in East Street Market. The database would differentiate between affordable and market retail units, and would be available to all existing businesses within the red line including shopping centre traders, kiosks holders and market stall holders within the red line, including the charities and businesses in Hannibal House.
177. The applicant has advised that the database would be available 7 weeks after planning permission is granted, would be available in different languages, and could be posted to people if requested. It would also detail the eligibility criteria for affordable retail coming forward as part of other developments, as set out in their respective s106 agreements. The Council will seek to use its role under the s106 agreement to coordinate the marketing and selection of tenants for the affordable retail units on nearby developments with the relocation of businesses from the site.
178. Concerns have been raised during public consultation on the application that the database would only give a broad indication of the area where vacant units would be identified, and ignores the desire of traders to remain close to the current location and clustered. Whilst this is noted, the Council has a role in agreeing the size and location of affordable retail units coming forward on the redeveloped Heygate Estate, because the s106 agreement requires an affordable retail unit strategy to be submitted for approval. It is expected that the affordable units available to relocating traders will be located on a single street at Elephant Park. In addition, the completed affordable units nearby at Elephant One are clustered. The Council is also formulating plans to deliver its own affordable workspace near to the site which could enable clustering to take place, and this is considered further below. The Council has no control over private retail units coming forward in the opportunity area.

Provision of on-site affordable retail and a contribution towards off-site affordable retail

179. As stated in the land use section of this report, between 5.3% affordable retail space would be provided on the site. There is the potential for a further 110sqm to be provided on the west site, although this would be flexible space which could be used for B1 purposes. To make up for the 4.7% on-site shortfall, a contribution of £753,384 would be provided towards off-site provision. This contribution has been calculated on

the basis of how much it would cost to deliver 857sqm of retail space (i.e. the on-site shortfall) at Council-owned off-site locations.

180. At present 6, 512sqm of floorspace within the red line is occupied by independent businesses. Of this, 2,507sqm is office space occupied by tenants of Hannibal House. The remaining 4,005sqm is occupied by businesses in retail premises, which would be eligible for affordable retail space under the SPD. Although the Elephant and Castle SPD permits affordable retail space to be offered to eligible businesses within the opportunity area which have been displaced by development, it is recommended that in the first instance the on-site provision be offered to eligible businesses within the planning application red line. An affordable retail strategy should be secured through the s106 agreement, which should include a specific requirement to provide details of measures to ensure that those sharing in protected characteristics can fully engage with the process.
181. Objections received during public consultation on the application seek the provision of 10% affordable retail should be provided on site, and a contribution towards off-site provision in addition.
182. The Elephant and Castle SPD does allow for on-site, off-site and an in-lieu contribution for affordable retail space. No information has been provided demonstrating that providing 10% on-site would not be feasible or viable, and the applicant has not proposed any off-site provision. As such, the application would not comply with guidance note SPD1 in this respect. Whilst this is disappointing, there are considered to be advantages to securing a contribution instead. It would enable the Council to potentially deliver its own affordable retail space within the opportunity area sooner than that which would come forward on the application site, and the Council would control the rents and could potentially provide greater flexibility to business owners.
183. The Council is currently considering two projects to deliver its own affordable retail space, one at disused garages beneath Perronet House, and the other at a garage block on Arch Street. Both sites are within 120m of the site, close to the existing customer base. The Council is undertaking feasibility studies and consultation on these projects, which in the first instance would only be available to existing independent businesses within the planning application red line boundary. These projects have the potential to deliver approximately 750sqm of retail space and could be completed by the end of 2019, significantly sooner than on-site affordable retail on the east site which would be unlikely to be ready for around 5 years after implementation; the affordable retail on the west site would not be completed for around nine and a half years. They would also enable businesses to cluster, something which a number of businesses have expressed a desire to do. A number of other developments in the vicinity are also delivering their own affordable retail space (details of which are set out below), and these too could potentially present opportunities for businesses to cluster.
184. The applicant's in-lieu contribution could be put towards these projects, and would be required prior to the closure of the shopping centre. It is noted however, that these projects are at feasibility stage, and it is not certain whether they will be delivered – planning permission would have to be secured for them in any event. If they do not come forward, the contribution could be spent on other measures to support existing businesses affected by the proposed development. This could include discounts towards rents or other occupation costs on units elsewhere in the opportunity area.

Relocation fund

185. The applicant has also offered a financial contribution to provide a relocation fund for affected traders. Officers requested £634,700 for the fund, related to the number and type of businesses within the red line, and this amount has been agreed by the applicant.
186. The applicant has also agreed that it could be administered without any predetermined restrictions on length of occupancy or statutory compensation, and that it would be available to all businesses within the red line, not just the shopping centre, including Hannibal House, the market stalls and kiosks, and the businesses within the railway arches. Allocation of the funds as to which businesses should receive funding and how much would be overseen by the Council in conjunction with Tree Shepherd.
187. Factors which could inform how funds are allocated could include how long businesses have been trading at the site and the viability and needs of the business, although the Council would consult with traders further on the principles and processes for allocating the fund which would then feed into the s106 agreement. The fund could be put towards the cost of professional services such as solicitors and surveyors, advertising to ensure that customers know where businesses are relocating to, capital expenses such as shop fronts or fit out, and compensation for loss of trade during relocation.

Affordable workspace (use class B1)

188. As set out in the land use section of the report, the applicant proposes to deliver 10% of any B1 floorspace coming forward on the west site as affordable, although it is noted that the quantum could be very limited and the long timescale for delivery is such that the charities would probably have relocated beforehand in any event. Notwithstanding this, it is proposed that this space be available in the first instance to small and medium-sized independent businesses and charities displaced from Hannibal House, followed by new business start-ups and businesses which employ less than 10 full-time staff. It is again noted that the charities would have access to Tree Shepherd support and the database of relocation opportunities.

Other equality measures

189. The Design and Access Statement contains a section on 'Access and Inclusivity' which sets out measures which would be incorporated into the development to assist people with mobility impairments, visual impairments, deaf people (what measures?), older people and small children. Measures which would be incorporated include level access to buildings with non-slip paving suitable for people with visual impairments, escalators and lifts within the shopping centre and lifts for the residential units, good lighting, seating and resting places, contrasting manifestations on glazing to the proposed LCC building, wheelchair accessible and adaptable residential units and space for parking mobility scooters. All of the car parking on the west site would be wheelchair accessible.
190. Positive equality impacts

New employment and training opportunities

191. As stated the proposed development would create 1,230 construction jobs over the 10 year build programme, and an increase of between 395 and 572 jobs in the completed development. Clauses within the s106 agreement should include measures to ensure

that those sharing protected characteristics are able to fully benefit from these.

Provision of new housing including affordable housing

192. Particular groups with significant housing need which are strongly represented in the local population include BAME groups, women, families with children and young people. These groups could stand to benefit from the proposed housing, and as noted in the affordable housing section of this report the affordable housing would include rents equivalent to social rent.

Improved and more accessible public realm, streetscape and transport

193. This could particularly benefit disabled people, with physical measures such as level surfaces, resting places and high quality lighting incorporated into the design. There would be improved access to the Northern Line and overground station, and The Court would create a place for social interaction. There would be improved connections to the wider area which would benefit older people, disabled people, young people, women and children.

New shopping and other facilities

194. The majority of people living in the opportunity area are likely to benefit from the new shopping and other facilities.

Community cohesion

195. The analysis advises that delivery of improved open space including seating, shelter from the roads and access to amenities is likely to increase community cohesion and foster a sense of place. It notes that those sharing protected characteristics may face barriers in experiencing these benefits, such as a loss of community cohesion where a cluster of services they use is dispersed or lost. Older people who use the bingo hall may experience a loss of social inclusion if this facility were no longer available for them to visit regularly (see below).

Educational opportunities

196. The proposed development would deliver a new building for the LCC which may be particularly beneficial for young people and BAME groups by providing improved educational facilities in the heart of the opportunity area.

Creative hub benefits of LCC

197. Plans are being developed for the LCC archive collections to be made available to the public. These benefits would likely be widely shared in the Southwark/London area and may provide benefits to groups with protected characteristics, including in relation to cultural identity.

Night time economy

198. The Equality Analysis advises that an increased night time economy may particularly benefit young people through employment and leisure opportunities, although it could decrease feelings of safety for older residents. Whilst this is noted, the proposal would offer a range of day and night time uses and natural surveillance of the area. Improved routes and good lighting would be provided through and on the site.

Sharing of benefits

199. The Council's equality analysis advises that throughout the development process community engagement will be carried out and equality effects could be experienced. For example, local young people and BAME groups may face barriers to participating and be under represented, and older people could be over represented.

Affordable retail in the wider opportunity area

200. Queries have been raised during public consultation as to whether any of the new market square to the east of the shopping centre would be available to existing market stall holders in The Moat. No space within the market square has been specifically allocated for existing market stall holders, and the new market square does not fall within the application red line boundary. Stall holders would be able to apply to the operator for a pitch within the new square, and the operator would be licensed by the Council's Markets Team; details would be included in the database of relocation opportunities.
201. Also of note is affordable retail space coming forward on other sites within the opportunity area. The 10% requirement in the Elephant and Castle SPD relates to all applications which would provide 1,000sqm or more of new retail space, and affordable retail has been secured on the following other sites, which are within approximately 220m of the existing shopping centre equating to around a four minute walk, and close to significant numbers of new residents.

Elephant One

202. This development contains 411sqm of affordable space in the form of seven retail units and one restaurant unit. They are located at ground floor level on the eastern side of this building, to the north of the new market square and in very close proximity to the site.
203. The restaurant unit is on the podium level facing the new market square. The s106 agreement requires them to be made available to eligible businesses in the shopping centre in the first instance, although only to businesses which began trading there before 19th February 2004. These units are largely complete on site, and an application is pending to include shopfronts to the units and to remove the 2004 restriction (reference: 17/AP/3619).

Former Heygate Estate (Elephant Park)

204. There would be approximately 1,351sqm (GIA) of affordable retail on the redeveloped Heygate Estate which would be available in accordance with the SPD eligibility criteria. It is not yet known when the shopping centre would close, but it is expected that approximately 500sqm of the affordable retail on the former Heygate Estate would be available by 2019.
205. The combined amount of affordable retail coming forward from both of these developments will be 1,762sqm. A further 857sqm would come forward on the east site, potentially 110sqm on the west site, and 153sqm through the Skipton House redevelopment following completion of the s106 agreement. A further 81sqm of affordable retail space has previously been completed at two developments - the Strata building and Dashwood Studios - on Walworth Road and let to independent

business operators from the shopping centre. This amounts to 2,963sqm of consented affordable retail space in the opportunity area, which would increase to 3,820sqm once the 875sqm off-site space is delivered including the projects at Perronet House and Arch Street.

Equality implications arising from the loss of the bingo hall

206. The Council's equality analysis notes that older people who use the existing bingo hall on the east site may experience a loss of social inclusion if this facility is no longer available for them to visit regularly. In light of this a separate survey has been undertaken in relation to the bingo hall, the findings of which are set out in a report 'Elephant and Castle Shopping Centre Redevelopment – Bingo Hall Survey Results: Final Report (February 2017). The survey found that this facility is predominantly used by older people, with 91% being over 45 and 48% being over 65 years of age. In terms of ethnicity, 62% of the user group identified themselves as being of Black / African / Caribbean / decent. In terms of frequency of visits, 94% of those interviewed visit at least once a week and 36% visit five days a week or more and 37% advised that they attend the bingo hall to socialise / get out of the house. 93% of those interviewed only use the bingo hall at the site – they do not visit other bingo halls. The report simply identifies which groups may be affected; it does not go as far as recommending any mitigation measures.
207. As stated the nearest bingo hall is at Surrey Quays Leisure Park, approximately 2.4 miles from the site. There are others further afield, and they are all approximately 25-30 minutes travel time from the site via public transport. Officers consider that there are no planning policy grounds for requiring the existing bingo hall to be replaced, and the overall quantum of D class floorspace on the site would increase.
208. The bingo hall operator could access Tree Shepherd support and the database of relocation opportunities, although it is noted that this would only identify retail premises. The applicant has advised that since 2014, 17 alternative locations have been suggested to the bingo operator, none of which have been accepted. It is also recommended that the s106 agreement contains obligations requiring the operator of the proposed cinema and LCC building on the east site to hold events which can include or be specifically provided for elderly persons or those from ethnic minorities to attend. This could include for example, a series of film screenings targeted at these groups, and should include measures to facilitate social interaction. The applicant has been asked to agree to a minimum number of hours for inclusion in the s106 agreement, but has advised that for viability and commercial reasons is unable to do so at the present time. The s106 agreement would therefore require details of the numbers of hours, frequency and types of events to be submitted for approval once operators for these facilities have been secured. It is not currently known what it may ultimately be possible to secure.
209. In addition to the above, the applicant has agreed to explore the feasibility of providing additional space within the proposed basement on the east site, and this would be secured through the s106 agreement. The removal of 13 spaces from the east site basement has freed up space which could be used for other purposes. This could include additional leisure space which could potentially be used as a bingo hall, or it could be for other uses which would appeal to people from BAME backgrounds and older people, and encourage social interaction. It is noted however, that this would only be provided if it is found to be feasible, and the Council would need to have a role through the s106 agreement in agreeing the scope and findings of the feasibility work, and appropriate marketing of the space if it were to come forward.

210. Given the uncertainty as to the quality of mitigation which could be provided for the loss of the bingo hall, Members must be aware that there could be adverse impacts upon people from BAME backgrounds and older people. This would include temporary impacts during construction when there would be no replacement leisure facilities available, although the s106 agreement should include a requirement for an information strategy to be submitted for approval. This should include details of how and when people would be informed of the date that the bingo hall would close, details of alternative bingo facilities, and details of how these can be accessed by public transport from the site. It is noted however, that although a cinema has been proposed, a bingo hall and cinema fall within the same use class therefore there would be no planning reasons why a bingo operator could not take on some of the leisure space within the proposed development.
211. Members must weigh the above in the balance with the other benefits and dis-benefits arising from the proposal. This is discussed further in the overall assessment section below.

Loss of the bowling alley

212. An equality analysis has also been undertaken in relation to the existing bowling alley, the findings of which are set out in a report 'Elephant and Castle Shopping Centre Redevelopment Equality Analysis – Bowling Alley Survey Results: Final Report' dated 17th August 2017. It identifies that the bowling alley caters for a mostly local clientele (89%), and it is used primarily by people of traditional working age, and from White English/Welsh/Scottish/Northern Irish/British' backgrounds. In light of this it is considered that there would not be any equality issues arising from the loss of this facility. It is noted that there is another bowling alley at Surrey Quays Leisure Park.

Affordable housing

213. Concerns have been raised by Southwark Law Centre and the Elephant Amenity Network that the type of affordable housing proposed, by excluding people who are economically inactive, would have adverse equality impacts as this could disproportionately impact, for example, upon people with disabilities or who are older. Economically inactive people would not be excluded from accessing social rent equivalent units. The other discount market rent units would be allocated in line with an intermediate housing list which the Council is currently developing. As part of this process an equality impact assessment of the intermediate housing list proposals would be undertaken, to ensure that it would not disproportionately impact upon those sharing protected characteristics.

Conclusion to equality implications

214. It is concluded that the proposed development could result in adverse equality impacts in relation to age and race, arising from the loss of the existing buildings on the site and impacts upon the businesses therein, and the loss of the bingo hall. It is considered that with the mitigation which would be put in place in relation to the existing businesses, the proposal would safeguard and promote the objectives protected by s.149 of the Equality Act as far as reasonably possible, given the nature of this major regeneration proposal which would undoubtedly bring about significant change. The quality of mitigation for the loss of the bingo hall is less certain at this stage for the reasons outlined above. The loss of this facility could therefore result in adverse equality impacts, particularly during construction, and Members will need to

keep this firmly in mind when determining the planning application.

Overall Assessment of Equality Implications

215. The proposed development would undoubtedly result in a significant change to the site. The public sector equality duty does not prevent change but it is important that the Council consider the acceptability of the change with a careful eye on the equality implications of that change give its duty under s.149 of the Equality Act 2010. The Council's duty is to have due regard to the objectives identified above when making its decision. In the present context, this means focussing carefully on how the proposed change would affect those with protected characteristics and ensuring that their interests are protected and equality objectives promoted as far as possible.
216. It is not proposed that there would be an automatic right of return for existing businesses operating at the site, and this has been raised as a concern in consultation responses. As set out in the land use section of this report there is a need to strengthen the role of Elephant and Castle as a major town centre, and to attract national, comparison retailers to address comparison spend 'leakage' to other boroughs and allowing all existing traders an automatic right to return could potentially undermine this. Guidance note SPD1 in the Elephant and Castle SPD therefore shares the requirement to provide affordable retail across all developments were 1,000sqm or more of new retail would be provided. Moreover, given the projected build period, it is likely that some businesses will either cease trading on or before closure of the shopping centre, or relocate to other parts of the opportunity area, borough or beyond.
217. There is clearly a potential for equality impacts to arise in relation to age and race, but it is considered that the mitigation proposed would be sufficient and reasonable. All existing independent businesses would be able to access Tree Shepherd support and the database of relocation opportunities. They would also be eligible to apply for financial support through the relocation fund. There would be 5.3% on-site affordable retail, and a contribution of £753,384 towards off-site affordable retail which would come forward in advance of that proposed on the application site. The proposal for the on-site affordable retail to only be offered to existing independent businesses within the red line in the first instance would go further than the SPD guidance which would allow it to be offered opportunity area wide. 10% affordable workspace is also proposed which could assist existing charities operating from the east site, and this too would be available to existing businesses in the red line in the first instance.
218. Overall it is considered that these measures would go some way to mitigating potential equality impacts, but given that some businesses may cease trading before the shopping centre closes or decide to relocate outside the opportunity area or borough, it is not possible to be precise regarding the potential impacts. If planning permission is granted, it is recommended that the measures outlined above be secured through the s106 agreement. The Southwark Law Centre and Elephant Amenity Network have commented that Members should make the final decision on any forthcoming s106 agreement rather than delegating this to officers. Whilst this is noted, this report details the matters to be secured in the 106 agreement and anything additional that the committee consider necessary can be identified in sufficient detail within any resolution. The detailed drafting will be agreed in the normal manner reflecting the committee's direction.
219. Southwark Law Centre and the Elephant Amenity Network have raised concerns that not all of the measures recommended in the Council's Equality Analysis would be

implemented. In addition to the measures outlined above and as relevant to the planning application, the Equality Analysis also recommends the preparation of a transition strategy to ensure that the relocation of existing leaseholder businesses would not negatively impact on the vibrancy and safety of the centre, ongoing equality and diversity monitoring including during construction, and the promotion of diverse ownership of businesses at future retail at the site. Tree Shepherd is currently working with the traders and shopping centre management on measures to increase footfall, and it is recommended that the other measures be secured through the s106 agreement.

220. The Equality Analysis also advises that measures should be taken to ensure that those sharing protected characteristics can share in the benefits which would arise from the proposed development. These benefits include construction jobs, jobs within the completed development, and the provision of on-site affordable retail. The s106 agreement would contain clauses to secure construction and completed development jobs for unemployed borough residents, and it is recommended that it includes a requirement to consider whether any specific measures are required to ensure that those sharing protected characteristics can fully engage with these opportunities. The same applies for the affordable retail provisions.
221. There are also specific adverse impacts from the loss of the Bingo hall which have been considered in detail above.
222. Based on the above assessments, officers consider that the proposal would safeguard and promote the interests of those with protected characteristics and promote the objectives protected by s.149 of the Equality Act as far as is reasonably possible given that a major regenerative project will inevitably create change to the existing situation.
223. Officers are satisfied that equality implications have been carefully considered in the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by s.149 of the Equality Act in determining whether planning permission should be granted for this regeneration proposal. Notwithstanding the efforts to mitigate, there are a number of adverse impacts which have been identified in this section. Members will need to keep those firmly in mind in determining the planning application. Officers have done so in making the overall planning assessment in this report.
224. It is concluded that the proposed development could result in adverse equality impacts in relation to age and race, arising from the loss of the existing buildings on the site and impacts upon the businesses therein, and the loss of the bingo hall. It is considered that with the mitigation which would be put in place in relation to the existing businesses, the proposal would safeguard and promote the objectives protected by s.149 of the Equality Act as far as reasonably possible, given the nature of this major regeneration proposal which would undoubtedly bring about significant change. The quality of mitigation for the loss of the bingo hall is less certain at this stage for the reasons outlined above. The loss of this facility could therefore result in adverse equality impacts, particularly during construction, and Members will need to keep this firmly in mind when determining the planning application.

Summary of equality impacts of the planning application

| Characteristic | Effect | Reason | Mitigation |
|----------------|----------|--|---|
| Age | Negative | Displacement of older business owners. Older | Measures in local business support and relocation strategy. |

| | | | |
|---------------------------------------|----------|--|---|
| | Negative | business owners may find relocation difficult. Large elderly community regularly use the bingo hall. | Information on closure, events in new cinema and LCC building, feasibility study for additional space in the east site basement which could be used for leisure purposes. |
| | Negative | Impact upon young people from closure of young stroke survivors charity. | Measures in local business support and relocation strategy. |
| | Positive | Increased access to open space and pedestrian routes would benefit older people and children. | |
| | Positive | Station box to facilitate and upgrade to the Northern Line Ticket Hall would provide a more accessible station for people of all ages. | |
| | Positive | Young people may benefit from the provision of affordable homes. | |
| | Positive | Young people may benefit from increased access to employment. | |
| Disability | Positive | Inclusive and accessible design principles have been considered and measures would be incorporated into the design. | |
| | Positive | 10% of the housing would meet the M4(3) wheelchair standards. | |
| Gender reassignment | Neutral | No effects identified. | |
| Marriage and civil partnership | Neutral | No effects identified. | |
| Pregnancy and maternity | Positive | Inclusive and accessible design principles have been considered and measures would be incorporated into the design. | |
| Race | Negative | There is a high proportion of business owners (and their employees and customers) from BAME | Measures in local business support and relocation strategy. |

| | | | |
|---------------------------|----------|--|--|
| | Negative | backgrounds who would be displaced from the site. There is a high proportion of Bingo Hall customers from BAME backgrounds. | Information on closure, events in new cinema and LCC, feasibility study for additional space in the east site basement which could be used for leisure purposes. |
| | Negative | Closure of charity which supports victims of crime which could be used by people from BAME backgrounds. | Measures in local business support and relocation strategy. |
| | Positive | Increased retail employment is, on average, expected to provide a disproportionate number of jobs to local ethnic minority residents, some of whom may otherwise face barriers to employment | |
| Religion or belief | Neutral | There are a number of business owners from minority religious beliefs who would be displaced from the site. Effects are not expected to differ depending on religion or beliefs. | |
| Sex | Neutral | No effects identified. | |
| Sexual orientation | Neutral | No effects identified. | |

Environmental impact assessment

225. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether they constitute Schedule 1 (mandatory) or Schedule 2 (discretionary) development in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended). In this case the proposed development falls under Schedule 2, Category 10b 'urban development project' of the EIA Regulations where the threshold for these projects is development including one hectare or more of urban development which is not dwellinghouse development, development including more than 150 dwellings, and development where the overall area of the development exceeds 5 hectares. The development would provide more than 1 hectare of development which is not dwellinghouse development, and would provide more than 150 dwellings. Notwithstanding this, an EIA is only required if it is likely to generate significant environmental effects having regard to the criteria set out in Schedule 3 of the Regulations, which include:

- the characteristics of the development;

- the environmental sensitivity of the location; and
 - the characteristics of the potential impact.
226. It is considered that the proposed development would generate significant environmental effects based upon a review of Schedule 3, and therefore an EIA is required.
227. Prior to the submission of the application the applicant requested a formal 'Scoping Opinion' under Regulation 13 of the EIA Regulations, to ascertain what information the Local Planning Authority considered should be included within the Environmental Statement (ES) (application reference 15/AP/4122).
228. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES including any further information, together with any representations made by consultation bodies and any other person about the environmental effects of the development.
229. The ES must assess the likely environmental impacts at each stage of the development programme, and consider impacts arising from the demolition and construction phases as well as the impacts arising from the completed and operational development.
230. It is not necessarily the case that planning permission should be refused if a development has the potential to have significant adverse impacts; it has to be decided whether any of the identified adverse impacts are capable of being mitigated, or at least reduced to a level where the impact would not be so significant or adverse as to warrant a refusal of planning permission.
231. It is noted that the EIA regulations were amended this year. However, the amendments came into force on 16th May this year, and for planning applications accompanied by an ES which were submitted before this date, the 2011 Regulations continue to apply.
232. The submitted ES comprises the Main Text and Figures, Technical Appendices, Townscape, Visual and Built Heritage Assessment, and a Non-Technical Summary. It details the results of the EIA and provides a detailed verification of the potential beneficial and adverse environmental impacts in relation to the proposed development, including the following areas of impact (in the order that they appear in the ES):
- Socio Economics
 - Transportation
 - Noise and Vibration
 - Air Quality
 - Ground Conditions and Contamination
 - Water Resources and Flood Risk
 - Archaeology
 - Wind
 - Daylight, Sunlight and Overshadowing
 - Cumulative Effects
 - Townscape, Visual and Built Heritage Assessment (ES Volume 3)
233. In assessing the likely environmental effects of a scheme, the ES must identify the

existing (baseline) environmental conditions prevailing at the site, and the likely environmental impacts (including magnitude, duration, and significance) taking account of potential sensitive receptors. It further identifies measures to mitigate any adverse impacts, and a summary of potential positive and negative residual effects remaining after mitigation measures included in the ES in order to assess their significance and acceptability.

234. The impacts of the proposed development are expressed as:

- Adverse – detrimental or negative; and
- Beneficial – advantageous or positive.

235. In terms of the significance of the effects, the ES describes these as:

- Moderate or substantial effects are deemed to be 'significant';
- Minor effects are considered to be 'significant', although they may be matter of local concern; and
- Insignificant effects are considered to be 'not significant' and not a matter of local concern.

236. Local effect means affecting neighbouring receptors and wider effects are considered on a district (borough) and regional (Greater London) level. Effects on other parts of the country or England as a whole are considered as national level, and abroad is considered as 'international' level.

237. Additional environmental information or 'Further Information' was received during the course of the application and in accordance with Regulation 22 of the EIA Regulations all statutory consultees and neighbours have been re-consulted in writing, site notices have been displayed and an advertisement has been displayed in the local press. The assessment of the ES and Further Information and the conclusions reached regarding the environmental effects of the proposed development as well as mitigation measures (where required), are set out in the relevant section of this report, although cumulative impacts are considered below.

Alternatives

238. Schedule 4 of the EIA Regulations sets out the information that is required for an ES, which includes an outline of the main alternatives considered. The ES considers two alternative options which are the 'no development' alternative and 'alternative designs'.

The 'no development' alternative

239. This option would leave the site as it currently exists. This was not considered to be a preferable option by the applicant and the ES advises that without redevelopment, the site would be likely to remain under-used and would result in a number of missed opportunities for the site and the wider opportunity area including:

- Continued deterioration of the existing buildings on-site and the site environment over time;
- No creation of a new and vibrant mixed-use neighbourhood on the site;
- No provision of new homes including affordable housing on the site;
- No job creation as a result of the provision of additional commercial floorspace;
- No improvement to the public realm and pedestrian accessibility and no provision of open space on the site;

- No improvement in the provision of cultural and entertainment facilities; and
 - No improvement in public transport accessibility.
240. In light of this the 'No development' scenario has been discounted by the applicant. Whilst it is noted that the existing shopping centre could be refurbished which some neighbouring residents have suggested, it is unlikely that this would have been able to address issues such as the need to improve access to the Northern Line station, to provide a strong retail frontages to the surrounding streets, and a significant quantum of residential accommodation.

Alternative designs

241. The ES advises that a number of alternative designs were considered as a response to key site constraints, together with responses to formal consultation with key stakeholders including with the Council and the GLA. The initial proposals only included the east site which was purchased by the applicant in 2013, and the west site was incorporated mid 2015. Design changes made to the east site before the planning application was submitted include changes to the location of the Northern Line ticket hall which was initially shown in a more central position and relocation of the proposed cinema from plot E3 to E2 to reduce overshadowing of The Court. A number of servicing options were considered including servicing via the existing ramp to the basement, through the basement of Elephant One, from Walworth Road, and the current proposal. The ES advises that the current servicing proposal was selected because it would be contained within the envelope of the new LCC building and would not compromise the public realm. On the west site changes included the extension of Pastor Street to the north, and provision of the cultural venue.

Alternative sites

242. The ES does not advise whether any alternative sites have been considered. Officers note however, that the east site is a development site in the saved Southwark Plan and the Elephant and Castle SPD, and both sites are within the central activities zone, the opportunity area and the SPD central character area. The SPD advises that within the central character area development provides the opportunity of improving its appeal as a shopping area, and given the prominent location of the east site above a tube station and which contains an existing shopping centre, it is considered to be the most appropriate in the area for attracting national comparison retailers. Moreover, the SPD identifies the east site as a potential location for tall buildings.
243. Officers concur that there are a number of problems with the east site including poor connections with the wider area and poor quality public realm. Refurbishment of the existing site including the shopping centre would not address these concerns or deliver the wider vision for the opportunity area. The proposal would contribute significantly towards meeting the targets for new homes and jobs in the area. As such, it is considered that the ES is satisfactory in demonstrating that alternative options have been considered, and that the applicant has adequately addressed this aspect of the EIA Regulations.

Cumulative developments

244. Chapter 16 of the ES considers the likely cumulative impacts of the development during the demolition and construction and completed and operational phases of the development. Two types of impacts have been considered; type 1 is the combination

of individual effects from the proposed development on a particular receptor, such as noise, dust and visual impact, and type 2 is the combination of effects from the proposed development and other developments in the surrounding area which when considered in isolation could be insignificant, but when considered together could result in a significant cumulative effect.

245. The ES concludes that during demolition and construction a combination of effects from noise, vibration and dust, together with visual and traffic effects arising from the proposed development could be experienced. There are a number of other schemes in the surrounding area and so similar construction work on the other sites combined with the proposed development would be likely to result in temporary local adverse impacts through increased traffic and noise. It is acknowledged that these impacts may not necessarily be short term given the anticipated construction period, although they would be minimised as far as possible through demolition and construction management plans.
246. Regarding cumulative impacts arising from the completed development, the ES predicts that these would generally be minimal, with a number of notable exceptions. There would be beneficial cumulative impacts in relation to job creation, the delivery of additional housing, and reductions in surface water run-off. Moderate to substantial long-term adverse impacts would be experienced by a number of neighbouring properties in relation to daylight and sunlight, together with overshadowing of a green space to the south of Albert Barnes House which is on the northern side of New Kent Road, although this would primarily be due to the consented development on the Heygate Estate.
247. The overall conclusion of the ES is that for the majority of environmental impacts, the residual effects of the proposed development (demolition, construction, and operational phases) following mitigation would be insignificant. However, there are likely to be some adverse minor effects, particularly during the demolition and construction phases and traffic related long-term effects from the completed development. The impacts have been categorised as follows:
248. Adverse residual effects of minor significance of varying duration:
- A loss of existing retail and leisure floorspace during demolition and construction (temporary);
 - New access roads from the site would lead to increased traffic flows arising from demolition and construction related traffic onto and off the site (temporary);
 - As a result of the increased population on the site there would be increased operational development traffic flows on the surrounding local highway network from the completed development (long-term);
 - There would be a local increase in disturbance of pedestrian and cycle routes during the demolition and construction with effects of minor significance (temporary);
 - There would be a minor effect on public transport users as a result of the demolition and construction phases causing temporary effects to local routes (temporary);
 - As a result of construction and demolition, under a worst-case scenario there would be moderate, temporary increases in noise at adjacent sensitive

- receptors at Oswin Street and Metropolitan Tabernacle (temporary);
- Temporary minor increases in vibration would be experienced, at worst, by sensitive receptors on Oswin Street and the Metropolitan Tabernacle as a result of construction and demolition activities (temporary);
- A number of properties within close proximity to the site (Oswin Street and 1-84 Hayles building) would have reduced daylight and sunlight (effects ranging in significance between Insignificant to substantial, long-term);
- There would be a long-term minor increase in transient overshadowing as a result of the Development;
- The completed development would result in varying reduction in sun hours on ground (0 to 40%+) in the local area due to the increase in massing (effects ranging in significance from insignificant to substantial, long-term);
- There would be a minor to moderate effect for the majority of viewpoints from the Development;
- The new façades would reduce solar glare from the development with the effects ranging in significance between insignificant to substantial).

249. Long-term beneficial effects of varying significance:

- The development would result in the provision of an additional 979 housing units including 'build for rent' and 36% affordable housing overall;
- Improved population and labour market would provide a long-term benefit at both district and local level (effects ranging in significance between moderate to substantial beneficial);
- There would be an estimated overall net gain in the number of full-time equivalent jobs supported by the proposed development;
- The development could generate additional household expenditure as a result of jobs created in association with the site, enhancing the local economy, and supporting further direct and indirect employment;
- Increased sustainable travel as a result of the implementation of the sustainable travel patterns commitment. This would include improved pedestrian permeability and increased site wide cycle facilities and public realm improvements;
- There would be reduced ground contamination and leaching into shallow groundwater from the site, which would have a long-term minor beneficial effect;
- The completed development would decrease pluvial (rainfall) and surface water flood risk owing to a surface water drainage strategy, the result of which would be long-term beneficial and of minor significance;
- Wind conditions in thoroughfares across the site would be improved (effects ranging in significance from Insignificant to minor beneficial). Conditions surrounding building entrances would be acceptable (effects ranging from minor adverse to minor beneficial); conditions would remain acceptable for cyclists and wind conditions would improve at bus stops (effects ranging in significance between Insignificant to minor beneficial).

250. Temporary, short to medium term beneficial effects:

- The creation of 1,230 construction jobs over the approximate 10-year construction period.

251. Officers have taken into account the information in the ES, together with consultation responses received following public consultation on the application. It is recognised that there would be adverse impacts upon neighbouring properties in relation to daylight and sunlight. Officers also consider that there would be harm to the setting of the Elliott's Row Conservation Area, and minor adverse impacts in relation to wind microclimate (although mitigation could be secured by way of condition). These adverse impacts must therefore be weighed in the balance with all of the other benefits and disbenefits arising from the application, and Members are referred to the conclusion to this report which draws these issues together.

Design, heritage assets and tall buildings including views

252. The proposal seeks to re-develop two prominent sites at the heart of the Elephant and Castle area. The two sites are separated by the north-south road, Elephant and Castle. The Shopping Centre site currently includes the modernist podium block and shopping centre, as well as the commercial tower of Hannibal House. Also included on the site is the main entrance and ticket hall for the Northern Line Underground Station as well as the main western access to the Elephant and Castle Rail Station which is accessed via the shopping centre. Finally, the Coronet, a former playhouse and now a music venue, the Charlie Chaplin public house, a dental surgery and news agents on New Kent Road are also on the site.
253. The second site is that of the London College of Communications bounded by St George's Road to the north and Oswin Street to the west. The site encircles the Metropolitan Tabernacle, a substantial and prominent place of worship, the façade of which is grade II listed. The recently completed Elephant and Castle Leisure Centre and Elephant One tower are located immediately to the south of this site. Immediately to the west of the LCC site is the Elliott's Row Conservation Area, an area characterised by historic mansion blocks and terraced houses.
254. Concerns have been raised following consultation on the application. These include objections regarding demolition of the shopping centre and Coronet Theatre, harm to the setting of neighbouring listed buildings and conservation areas, that there would be too many tall buildings in the area resulting in an unattractive urban environment, and that the west site is not identified as being appropriate for tall buildings in the Elephant and Castle SPD.

Heritage Assets

255. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes the duty on local planning authorities to have special regard to the desirability of preserving or enhancing a listed building and its setting or any features of special architectural or historic interest which it possesses. Further, special attention should be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. This is also reflected in the NPPF (2012) and supporting NPPG (2014), and requires all development to conserve or enhance heritage assets and their setting and avoid causing harm. Designated heritage assets include Statutory listed buildings and designated conservation areas.
256. The application sites do not include any listed buildings and are not located in a conservation area; the Coronet Theatre was recently considered for listing by Historic England but rejected. The scale of the proposed development would be such that it is necessary to consider its impact on a number of conservation areas, both in

Southwark and Lambeth. The nearest listed buildings include: The grade II listed Michael Faraday Memorial, the Metropolitan Tabernacle, Metro Central Heights (former Alexander Fleming House), the group listed properties in West Square, and the former Church of St Jude. Its influence is likely to extend to the grade II* listed Obelisk at St George's Circus and the grade II listed Imperial War Museum.

257. Undesignated heritage assets nearby include the railway viaducts that criss-cross the area. The spaces on either side of the viaduct have been highlighted in the draft New Southwark Plan as the 'Low-Line', a series of linked spaces and thoroughfares which would hug the viaduct and introduce a broad range of uses in the railway arches. The Coronet Theatre is also an undesignated heritage asset. It is currently located on the Shopping Centre site. It was recently considered for listing by Historic England but not recommended for statutory listing.

258. The affected conservation areas would be as follows:

Southwark

- St George's Circus Conservation Area
- King's Bench Conservation Area
- Trinity Church Square Conservation Area
- Larcom Street Conservation Area
- The Pullens Estate Conservation Area
- Elliott's Row Conservation Area
- West Square Conservation Area

Lambeth

- Renfrew Road Conservation Area
- Walcot Conservation Area

259. Officers have considered the impact of the proposal, both on its own and cumulatively with other consented or implemented proposals in the area. The criteria used is current guidance including 'Seeing History in the View' (Historic England 2015) which recommends that an assessment of the magnitude and quality of any impact are considered.

260. The framework used is included in the above guidance and requires Local Planning Authorities to consider the magnitude of the effect as well the quality of effect. This is mainly considered in the views taken in and around the area. The views have been selected to ensure that the greatest visual impact is recorded and selected relative to their effect on the significance of heritage assets.

Magnitude of effect

| | |
|------------|----------------------|
| None | No effect |
| Negligible | Imperceptible effect |
| Minor | Slight effect |
| Moderate | Clear effect |
| Major | Major effect |

Quality of effect

| | |
|---------|--|
| Adverse | The quality of the environment is diminished or harmed |
|---------|--|

| | |
|------------|---|
| Neutral | The quality of the environment is preserved or sustained or there is an equal balance of benefit and harm |
| Beneficial | The quality of the environment is enhanced. |

261. In the main, the visual intrusion into the identified heritage assets has been found to be moderate and beneficial and not causing any harm. There are a number of heritage assets where the incursion is likely to be greater. These are considered below.

The Metropolitan Tabernacle (grade II listed building)

262. The views submitted with the application demonstrate that the tallest tower on the western site (W2) would be significantly closer to the Tabernacle than the recently completed One the Elephant development to the south. The proposal would result in the northern flank of the Tabernacle being exposed, and a benefit delivered by the scheme would be the completion of this exposed flank in stone, with a returning cornice to match the southern end of the Tabernacle which also has a cornice returning along its southern face.
263. The design approach has been to match that of the One the Elephant development and has sought to complement the Tabernacle with a low, stone-faced music venue building on the north side and to set the tower back from and to the north of the Tabernacle. This would mean that in a straight-on view from the opposite side of Elephant and Castle the silhouette of the Tabernacle would be largely preserved and could be viewed against the sky. As one moves around and to the south of the proposed towers on plot W2 would interact with and dominate the view, however this would be a more incidental, oblique townscape view that would include a number of existing towers and one where the quality of the design, its composition and materiality, would be better appreciated. Officers have concluded that the magnitude of the effect of the proposal on the Tabernacle would be major (meaning there is a clear effect), and that the quality would be neutral (meaning the quality of the environment would be preserved or sustained and there would be an equal balance of benefit and harm).
264. The legal duties referred to above require that substantial weight is placed on any harm to listed buildings. Officers consider that there will be some harm to the oblique view of the of the Tabernacle. It is necessary to place substantial weight on that harm. The NPPF (2012) and the associated NPPG (2014) guide Local Planning Authorities to balance the harm (weighed as indicated) against the benefits of the proposal. In this case, there are substantial public benefits to the development (which includes the works to enhance the Tabernacle itself, the substantial contribution to the public realm, the complimentary design of the new cultural venue immediately adjacent to the Tabernacle, and the exceptional quality of the design of the tower which would be elegant, calm and with appropriate cladding materials which would complement the historic building). Officers are satisfied that the public interest is such as to decisively outweigh the harm identified above notwithstanding the special regard that must be placed on it by the legal duties identified above.

West Square Conservation Area

265. In the main the visibility of the proposed development would be limited to the edges of the conservation area along Brook Drive and St George's Road. In these locations the impact on the views would include the wider non-historic townscape and a number of towers in and around the Elephant and Castle area to which this proposal would be a high quality addition . They do not affect the significance of the conservation area. In

the main therefore the magnitude of the effect is considered to be *minor* (meaning a slight effect) and the quality *beneficial* (meaning the quality of the environment is enhanced).

266. From West Square itself, the views submitted with the application demonstrate that the magnitude of effect of the two towers on the western site (W2) would likely be *moderate to major* (meaning clear to major effect), whilst the quality of the effect is likely to be *neutral* (meaning the quality of the environment is preserved or sustained and there is an equal balance of benefit and harm).
267. Consultees have raised concerns about the impact of the proposal on the West Square Conservation Area. During the course of the application additional views have been prepared which demonstrate that the proposed towers in plot W2 would be visible from within the landscaped garden at the centre of West Square, around the chimneys of the houses facing the Square. From this sensitive location the magnitude of the effect is considered to be *minor* (meaning slight effect) and the quality of the effect *neutral* (meaning the quality of the environment is preserved or sustained and there is an equal balance of benefit and harm).
268. Officers are satisfied that there would be no harm to the character or appearance of the West Square Conservation Area or its historic significance. As such on officers assessment there is no conflict with the legal duties identified above. If members were to disagree, then it would be necessary to place substantial weight on any harm identified but also to consider whether such harm would be outweighed by the by the public benefits of the proposed development which include the substantial contribution to the public realm and the exceptional quality of design of the towers which would be recessive when viewed from West Square.

Elliott's Row Conservation Area

269. The Elliott's Row Conservation Area is predominantly made up of large mansion blocks arranged along north-south streets linking Brook Drive to St George's Road. The scale of the historic buildings and the relatively narrow proportions of the streets mean that there is limited visibility of any of the taller buildings in the Elephant and castle core area from within the conservation area.
270. In the main the visibility of the proposed development would be limited to the edges of the conservation area along Brook Drive and St George's Road. In these locations the impact on the views would include the wider non-historic townscape and a number of towers in and around the Elephant and Castle area, to which this proposal would be a high quality addition. They would not have any adverse impact upon the character and appearance of the conservation area. In the main therefore the magnitude of the effect is considered to be *major* and the quality to be *neutral* (meaning that the quality of the environment would be preserved because there would be no harm).
271. The views submitted with the application demonstrate that the greatest visibility of the development would be from the allotments on Elliott's Row where the magnitude of the effect of the three towers on the western site is likely to be *major*, especially when considered together with the One the Elephant and Strata development which are also visible in this view. The quality of the effect is likely to be *beneficial*.
272. Officers are satisfied that the character and appearance of the conservation area would be preserved by the proposed development. It is recognised that there would some significant change in views within the conservation area, especially around the

junction of Hayles Street and Lamlash Street. However, the affected view would be of the backs of the properties on Elliott's Row and would not affect the historic significance of the conservation area, especially as the development would appear as a backdrop in the middle distance. In officers judgment the impact of this change would be on balance neutral and accordingly officers are satisfied that the character and appearance of the conservation area would be preserved. Were members to disagree and consider that there is harm to the character and appearance of the conservation area arising from this change, then it would be necessary to place substantial weight on that harm given the legal duties identified above. The NPPF (2012) and the associated NPPG (2014) guide Local Planning Authorities to balance the harm (weighed as indicated) against the benefits of the proposal. That balancing exercise would need to consider whether the harm was outweighed by the substantial public benefits of the development which include the contribution to the public realm and the exceptional quality of design of the towers which would consolidate the cluster around the core of the Elephant and Castle Opportunity Area

Undesignated heritage assets

273. The proposal preserves the undesignated heritage assets on and around the site with the exception of the Coronet which is proposed to be demolished to make way for the new LCC building. This heritage asset is not statutory listed and not listable. In these circumstances the NPPF (2012) and the associated NPPG (2014) guide Local Planning Authorities to balance the loss of an undesignated heritage asset (weighed as indicated) against the benefits of the proposal.
274. Officers are satisfied that any harm arising from the loss of this undesignated heritage asset is outweighed by the substantial public benefits of the development which include the contribution to the public realm, the improvements to the London Underground Station and the exceptional quality of design of the new UAL Building.

Conclusion to heritage assets

275. As identified in the above analysis, in most respects officers are satisfied that the proposed development would not have any harmful impact on designated heritage assets. The exception identified above is that there would be some harm to the grade II listed Metropolitan Tabernacle. Substantial weight must be placed on this harm given the need to have regard to the desirability of preserving or enhancing the special character of listed buildings and their setting. However, as identified above, it is considered that even placing substantial weight on this harm in accordance with the specific legal duty, it would be outweighed by the public interest considerations identified above. That balance is consistent with the guidance in the NPPF and NPG. There would be significant changes to the views from within the West Square Conservation Area and the Elliott's Row Conservation Area as has been discussed above. Officers' assessment is that the character and appearance of the conservation area would be preserved because the changes which would occur would not be harmful (as discussed in detail above). If members were to take a different view of these impacts, it would be necessary to place substantial weight on any harm to the character and appearance of the conservation areas given the legal duty identified above. The adverse impact arising from the loss of the Coronet (an undesignated heritage asset) is considered above and must be weighed in the balance against the public benefit (as discussed above).

Urban form and arrangement

276. The east site is at the core of the town centre. It is an 'island' site completely surrounded by busy arterial roads and flanked by the elevated railway line. As described in the details of proposal section of the report the proposal would accommodate: a new shopping centre; a new station box for London Underground, a new university campus for the London College of Communications; and three residential towers. On the west site the proposal is for a mix of residential and commercial uses as well as a new music venue and including three residential towers.
277. The urban form chosen for the east site has been to establish a network of radiating pedestrian 'streets' which would penetrate site and divide it into four blocks (E1, E2, E3 and E4). The northern-most block (E1) would accommodate the new Northern Line ticket hall and LCC building, whilst the others would provide the main retail spaces. At the centre of the site there would be a narrow 'court' which would be the focus of the two new routes and the entrance to the overground railway station. Three towers would be located on the southern half of the site, the tallest of which would at the centre (plot E2), with the others located at either end of plot E3.
278. On the west site the proposed arrangement would divide the site in two with a new north-south route which would extend Pastor Street northwards to connect with St George's Road. In this way, the long and narrow north-south urban arrangement of the site would reflect the historic development of the Elliott's Row Conservation Area to the west which is arranged in similar north-south blocks. The site would be further split into three plots (W1, W2 and W3). W3 would be a long linear mixed-use block facing onto Oswin Street. At the northern end of the site there would be a small public space which would mark the arrival onto the northern roundabout and an important destination for access to the Underground – for both the Bakerloo Line and the Northern line stations. To the north of the Metropolitan Tabernacle there would be a new cultural venue, a simple, rectilinear form which has been designed to mirror the recently completed One the Elephant development. Finally, three towers would be sited on the northern half of the site. The first tower would be located at the junction of Oswin Street and St George's Road (W1), and the others would step up in height towards the middle of the site (W2), the tallest being immediately adjacent to the Tabernacle.
279. The proposed urban form and the arrangement of blocks would be appropriate for both sites. They give the scheme a clear and logical order built around the key pedestrian desire lines. The radiating routes on the east site pick up on the main pedestrian approaches to the site and divide the site logically along these key desire lines. On the west site the urban form enables the creation of an appropriate residential edge to the site which would complement the residential character of Oswin Street. By extending Pastor Street across the site the proposal focusses the commercial activity at the centre of the site and joins up a key desire line that starts from the St Mary Churchyard to the south and extends to the transport interchange at the northern roundabout.

Tall Buildings

280. As the proposal involves a substantial number of tall buildings on both sites, it needs to be considered against all the requirements of saved policy 3.20 of the Southwark Plan which requires that all tall buildings should:
- i. Makes a positive contribution to the landscape; and
 - ii. Is located at a point of landmark significance; and
 - iii. Is of the highest architectural standard; and
 - iv. Relates well to its surroundings, particularly at street level; and

- v. v. Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

281. Taking each of these in turn

i) Makes a positive contribution to the landscape

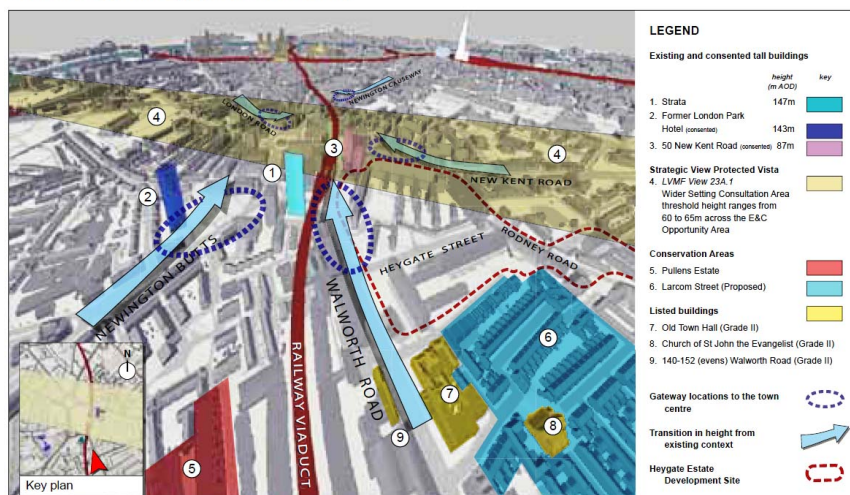
282. Landscape and the public realm is an important part of any proposal for a tall building. It will not only create a setting for the tower, allowing it to 'land' appropriately, but also an opportunity for such a development to demonstrate the benefits that can flow from expanding vertically in this way freeing up more space at grade in a congested part of the city such as this. This part of Southwark is characterised by busy arterial routes overlaid with important pedestrian thoroughfares. The site is located at the core of the Elephant and Castle town centre, as well as important transport links by bus, rail and the Underground.
283. The public realm would be made up of a number of new routes introduced across the sites and two new public spaces – the new 'court' at the centre of the east site and the public space at the northern end of the west site. On the east site the new routes are designed as pedestrian 'streets' which would encourage movement towards the centre of the site and offer access to the 'court' and the railway station to the east. These routes would be well proportioned and appear like narrow streets typical of this area. They would help to break up what could become a large impenetrable block, and introduce active uses onto the routes.
284. The Court would be at the confluence of the new routes and its focus would be plot (E4) at the centre of the site. This would be a key location for the site and an important destination for visitors seeking to change to or from the railway line. This station serves the Thameslink line which is likely to face a significant uplift in passenger numbers in the years to come. This public space at the centre of the site would also serve as a brief respite for visitors, commuters and shoppers alike from the busy, traffic dominated surroundings of the site. The function of this space would therefore be threefold: it would be a destination for visitors to the area, a new front door to the elevated railway station, and a new route across the site. Block E4 has been kept deliberately low in scale – just 4 storeys in height – and would allow sufficient space at the centre of the site to fulfil these three roles adequately. This space would be 954sqm, a similar size to the South Bank Centre food market.
285. Finally, on the east site the proposal includes a number of elevated gardens for residents. These elevated gardens are well designed, and would include bridges that would link across from plot E2 to E3 and would complement the communal offer provided within the towers.
286. On the west site the public realm would be less constrained. The extended Pastor Street would work well and would become the main address for the two new towers in plot W2, whilst the new public space at the northern end would be appropriate in scale and proportion to act as a suitable destination. At this northern end of the site the public space has to contribute to the idea of Elephant Square - the focus of the area and the address of two Underground stations. This is not only a busy trafficked area but also a destination for residents and visitors alike. The key frontage onto the notional 'square' defined by Perronet House and Metro Central Heights is also the main façade onto the northern roundabout and has an axial relationship with Newington Butts to the south. The landscape would reinforce the 'square' and complement the surviving buildings in it.

287. Finally, on Oswin Street the building line of the proposed mansion blocks has been set back sufficiently to preserve the mature trees which would ensure that the public realm feels generous and helps to screen the proposed development beyond. Care should be taken to ensure that the existing line of trees is preserved and additional measures to protect the line of trees during the course of construction should be reserved by way of a condition.

ii) Is located at a point of landmark significance

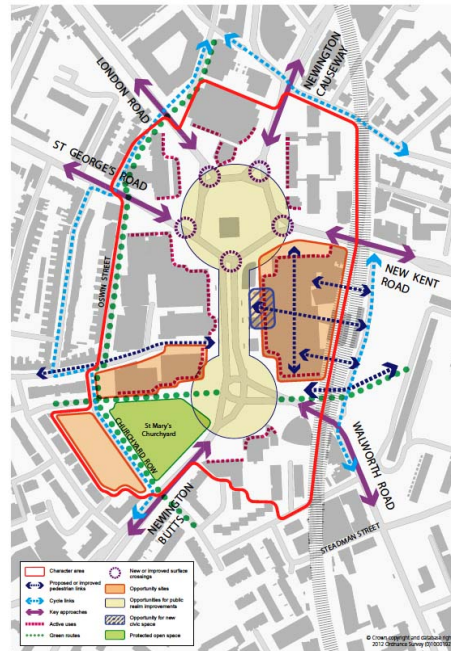
288. The definition of a point of landmark significance is the subject of the adopted Elephant and Castle SPD which concludes that the site is an appropriate location for tall buildings at the confluence of important routes and the focus of many views in this location. Both parts of the site are located in the Central Character Area which extends from Skipton House in the north to Strata and the St Mary Churchyard to the south, and from Oswin Street in the west to the railway viaduct in the east. The SPD described the morphology of the cluster at the core of the Opportunity Area and emphasises that building heights should rise towards the Central Character Area. (Fig 14 Elephant and Castle SPD (2012) p57)

Tall buildings strategy (view from south)



289. The sites are considered in detail in the indicative proposals map for the Central Character Area (Fig 19 Elephant and Castle SPD (2012) p78) which highlights the shopping centre site as an 'opportunity site'. Whilst the LCC site is not specifically highlighted as an 'opportunity site', this does not suggest that the site is not appropriate for a tall building. In the same document the Skipton House site is not identified in this way, and yet the council resolved to grant permission for two tall buildings on that site. Officers are satisfied that the both parts of the application site are located at a point of landmark significance and accord with the guidance in the adopted SPD.

Indicative proposals for the central character area



iii) Is of the highest architectural standard

290. The scheme is made up of a number of buildings all contributing to the whole, and each designed in its own right to respond to its functional requirements and the role it would play in the overall composition. When we consider the quality of design we consider the fabric, function and composition before we can conclude that they are of exceptional quality of design. Fabric relates to the cladding material and its appropriateness in the context of the Elephant and Caste town centre; function includes (for residential buildings) an assessment of the quality of accommodation, dual aspect etc.; and composition is an aesthetic assessment of the whole; the arrangement of windows, features and, where tall buildings are involved, the design of the base, middle and top.
291. The E&C SPD includes additional design guidance in respect of tall buildings and requires developments to ensure that they:
 - *Conserve the Outstanding Universal Value (OUV), integrity and authenticity of both the Westminster and Tower of London World Heritage sites and their settings.*
 - *Have due regard to the London View Management Framework (LVMF), World heritage Management Plans and conservation area appraisals.*
 - *Conserve or enhance the significance of heritage assets and their settings including listed buildings, locally listed buildings, conservation areas, registered parks and gardens and archaeological remains.*
 - *Help reinforce way-finding and the legibility of the area.*
 - *Help reinforce the hierarchy of spaces and streets in the area; the amount of public space provided at ground level will be expected to be proportionate to the height of a building.*
 - *Help reinforce the character and function of the area; they will be expected to interact with the streetscape providing a generously proportioned active frontages at their base.*
 - *Achieve visual separation from adjoining development around the base of the*

building.

- *Demonstrate a considered relationship with other tall buildings and building heights in the immediate context; cumulatively, tall buildings should not coalesce visually to form a single mass.*
 - *Ensure that buildings which will have a significant impact on the skyline are slender and elegant with regard to the width-to-height ratio; they should be attractive city elements with a strong geometry when viewed from all angles and the tops of buildings should be well articulated and recessive.*
 - *The skyline and relationships between buildings should help reinforce the character and identity of the area and contribute positively to London's skyline, when viewed locally and in more distant views.*
 - *Allow adequate sunlight and daylight into streets, public spaces and courtyards.*
 - *Avoid harmful microclimate and shadowing effects or adverse affects on local amenity.*
 - *Demonstrate an exemplary standard of design, provide high quality accommodation which significantly exceeds minimum space standards and promote housing choice by providing a mix of unit types.*
 - *Incorporate communal facilities for residents.*
292. The proposal currently has the capacity to meet and exceed all of these tests. Taking each building in turn.

Plot E1, The new LCC building

293. This would be a well composed and highly articulated block. It has been designed to meet the requirements of the College which includes a new programme of public events which would improve public access to their collection. The design would accommodate this new public function and include publicly accessible spaces, galleries and meeting spaces on the lower floors which would turn it into a public building with a significant presence at the northern end of the site. Also included in this block, at its northern-most row, would be the new Northern Line entrance and ticket hall. This is a key location for the new entrance and it would be a significant feature of this building. The entrance is designed to be immediately recognisable, generous and accessible. It would lead to the ticket hall which would be located underground, and has been engineered to offer escalator access to all platforms.
294. This building is proposed to be clad in a dark grey glass-reinforced concrete (GRC), contrasted with natural metal finished windows. The façade uses the device of a 'printer's tray' composed of deep openings in a vertical orientation, which borrows from the traditional skills delivered at the College. The design of this block is highly articulated and refined and its sculpted architectural form would be appropriate to its higher educational use. Its maximum height would be 55.2m AOD which would be comparable to the height of the tallest tower of the grade II Listed Metro Central heights on the opposite side of New Kent Road.
295. Plots E2 and E3 would make up the bulk of the retail space for the new shopping centre. They would be shaped by the new radiating routes which would feed to the centre of the site and have been designed as pedestrianised external routes lined by shops on two levels. The routes are modelled on the Shad Thames road width which would be appropriate in this intensely urban context. Care has been taken, by servicing the buildings from basement level, to ensure that all the edges would remain active with either retail frontages or residential lobbies. On the upper floors the blocks

would include a larger leisure space for a multi-screen cinema. In this way the two blocks would establish a shoulder datum or podium of around 4-storeys in height which would be appropriate in the area and reflective of the prevailing height of the historic urban context including the Metropolitan Tabernacle on the opposite side of Elephant and Castle.

296. On top of the podium blocks there would be three residential towers. Two are designed as a pair of towers 79.84m AOD and 86.24m AOD and located on the main southern approach from Newington Butts. The tallest would be the tower on plot E2, made up of two conjoined blocks with a shoulder height of 103.3m AOD and a maximum height of 124.3m AOD.
297. The residential towers are designed as conjoined extruded squares which would step and reduce as they reach their full height. They are proposed to be clad in brick which would give them a clear reference to the neighbouring context. In the tallest tower on plot E2 the two extruded squares would set at an angle relative to each other, which would not only result in a highly articulated external envelope, but also means that the lift core which would be at the junction between the blocks would benefit from external windows and natural light. In effect this building would be made up of two narrow towers linked by a common core. The form of this tower is intended to be three-dimensional and interesting from several angles, as one tower would drift into view whilst the other would slide away in the round.
298. On the west site the architectural tone of the development would be established by the mansion block design of plot W3. This is intended to reflect and reinforce the established historic character of the Elliott's Row Conservation Area and Oswin Street. This linear block would be divided into three parts arranged around their main access cores. It would have a residential frontage onto Oswin Street and a commercial frontage onto Pastor Street to the rear. With a series of bays at 4-storeys, shoulders at 6-storeys (24.6m AOD) and deep set-back top rising to 8-storeys (31.5m AOD), the three blocks have been designed to complement their residential setting and establish an appropriate response to the street.
299. Block W3 has been designed as a brick-clad mansion block. Its design would be defined by its primary order of bays and blocks and secondary order of windows which would be vertically arranged. The main entrances would be prominent and logical and, above the datum of maisonettes, the units would be clustered around the cores to ensure that most benefit from a dual aspect.
300. The first tower on this site is tower W1 on the northern edge of the site, at the corner of Oswin Street and St George's Road. This building is designed as a sculpted form loosely arranged around the spaces it would face, with an irregular shape at ground level which would be extruded vertically with successive steps to reveal a narrow, geometric form at the top. The steps would be linked around the heights established by plot W3 – starting at 31.1m AOD and then rising to its maximum height of 71.9m AOD. This corner is currently the location of the tallest building on the LCC site and therefore an established location for a taller element. This tower recognises the prominent location at the St George's Road junction and would make it a key gateway building at the core of the opportunity area and suitable for a tall building.
301. In its detailed design tower W1 would be elegant and uncluttered, with a façade made up of a combination of brick contrasted with stone-like inserts on the lower floors. On the upper floors, and as the building reaches its peak, the prevalent material would be the stone-like cladding which would give it a lighter expression. In this way the tone

and architectural language has been established for the towers on the western site.

302. Plot W2 would be made up of a podium set at four storeys in height and topped by two towers. The podium would be set back from the edge of the street and would align with the recently complete Elephant One development. In this way it is intended to complete the composition of the Newington Butts townscape with the Metropolitan Tabernacle as the centre-piece. The podium would match the stone finish of Elephant One which was modelled on the Tabernacle, and is appropriate in this historic context. It would house a new music venue at the Elephant and Castle which would contribute significantly to the vitality of the area. Set well back and accessed from the rear on Pastor Street, are two towers are designed as two irregular shapes that would step and recede as they reach the top, ranging in height from 84.7m AOD and 119.9m AOD.
303. The detailed design of the two towers would be highly articulated, simple and composed. The podium block would work in a similar way to that of the Elephant One development. It is designed to act as an intermediary building which would address the street and introduce a visual layer in the foreground of the taller elements which would be located in the middle of the site.
304. In conclusion, the design of the scheme is considered to be of exceptional quality, with blocks which would be highly articulated, well composed, and clad in high quality materials. Each function would expressed in a distinctive manner and the two parts of the site have been designed by separate design teams (albeit from the same architectural practice) to give each building its unique architectural identity.
305. All the towers would be located directly in the backdrop of protected London View Management Frame (LVMF) View 23A.1 of the Palace of Westminster World Heritage Site (WHS) from the Serpentine Bridge. Whilst the height of the tower would exceed the threshold of the protected view (roughly at 65m AOD in his location), the information submitted with the application demonstrates that they would be set behind the Victoria Tower (at the Westminster WHS) and are not likely to be visible from the protected view.

iv) Relates well to its surroundings, particularly at street level

306. In designing the separate plots care has been taken to ensure that each element would present active frontages on all sides. Both parts of the site would be completely integrated with the city in this busy urban setting and as such, with the exception of the western face of the viaduct, the blocks are designed with 360 degree frontages.
307. On the east site the retail frontages would be concentrated on the pedestrian routes at the centre of the site. Arranged on two levels, the shopping offer is designed to form the new pedestrian routes which would be open to the sky and would appear like a shopping precinct of the city. On the perimeter of the site on the New Kent Road, Newington Butts and Walworth Road frontages, the design seeks to establish the individual addresses for the separate towers, the new Underground Station and the new LCC building. As they would be defined by the main desire lines in this area and with blocks that are designed with active frontages to both their inner and outer facades, the east site would be completely integrated into the city at street level. There are some concerns regarding the outward facing first floor levels of the proposed shopping centre, particularly that facing Walworth Road which would be enhanced by further detailing. It is recommended that this be secured by way of a condition. Conditions for detailed drawings of key features of the buildings together with material

samples would also be required to ensure a high quality finish, and these have been included in the draft recommendation. This includes details of the retention and relocation on the east site of the elephant sculpture which is currently displayed at the front of the shopping centre.

308. The mansion block is designed as an intermediary block. It would be set well back on Oswin Street where it would be lined with the existing mature trees and residential entrances. In contrast the main commercial frontages would be located on the newly extended Pastor Street which would bisect the site. At the northern end the corner of Elephant Square would be defined by the main entrances to the cultural venue and a series of retail frontages at the base of the towers. Adjacent to the Tabernacle, the proposal would address the route which links Pastor Street to Newington Butts. In this way, the proposal for the west site would complement its urban setting. Its design respond appropriately to its residential context and responds appropriately to its surroundings.

v. Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views

309. The application is accompanied by a thorough Townscape and Visual Impact Assessment (TVIA) which includes the strategic, wider and local views. Each has been prepared in accordance with the published LVMF methodology which requires Accurate Visual Representations (AVRs) to be prepared showing the development in its setting. In the Strategic Views the submitted views demonstrate that the substantial height of the six towers would consolidate the cluster of towers in the core of the opportunity area and would avoid harm to any strategic landmarks.
310. The most sensitive Strategic View is the LVMF View 23A.1 of the Palace of Westminster from the Serpentine Bridge. The protected backdrop of this view extends across the core of the area and extends east along New Kent Road at around 65m AOD. Whilst the proposed buildings would be substantially taller than 65m, the views submitted with the application demonstrate that they would not be visible from the Protected Viewing Point which is at the centre of the bridge, from where the development would be hidden by the substantial form of the Victoria Tower and therefore would not affect the viewer's ability to recognise and appreciate the Strategic Landmark of the World Heritage Site or affect its Outstanding Universal Value.
311. In addition, the dynamic view across the bridge has also been tested, and whilst some visibility may occur in the northern approach to the Viewing Point, any visibility would be negligible. In this approach the development would largely disappear from view soon after the northern bridgehead, and a substantial distance from the Viewing Point at the centre of the bridge.
312. In their initial consultation response Westminster City Council questioned the TVIA and commented that insufficient information has been provided with regard to the visual assessment, particularly the view from 23A.1 and Serpentine Bridge Sequence for the Council to determine if there will be an impact on the setting of Westminster World Heritage Site. Westminster requested higher resolution images where it is possible to zoom in and that do not pixelate. These have been duly provided, and Westminster have confirmed that the Council has no objections to the application.
313. Officers are satisfied that the Accurate Visual Representations (AVRs) submitted with the application comply with the LVMF. This is a distant view (the viewing point is over 5km or 3miles from the application site). The information submitted is acceptable and

demonstrates that there would be no impact on the Strategic Landmark of the World Heritage Site.

314. In the wider views the TVIA demonstrates that the emerging cluster of tall buildings at the core of the Elephant and Castle Opportunity Area would be consolidated by the six proposed new towers. The towers would be well articulated, and would complement the existing towers which include Strata, One the Elephant, the 360 Hotel, Elephant One and Eileen House.
315. The most challenging views would be the local views where the towers would be visible from within the Elliott's Row and West Square Conservation Areas which are immediately to the west of the site.
316. The views demonstrate that the towers would be visible from one location on Elliott's Row – the allotments at Lamlash Street. Here the proposed development would be visible, with the mansion blocks on Oswin Street in the foreground and the three towers layered behind them. Whilst the view is a characterful aspect of this part of the conservation area, it is an incidental view and not one of high significance. Indeed, it was chosen simply to demonstrate the limited visibility of the development. In any case, the Council's policies require development to preserve or enhance the character and appearance of the conservation area and, in this view the separation of the towers, the intermediate form of the proposed mansion blocks and the quality of the architectural design would help to orientate the viewer in the city and highlight the proximity of the town centre.
317. In the West Square Conservation Area, there would be limited visibility of the tallest tower on the west site (W3) from the square itself. The tower would be visible over the rooftops in the same way that the One the Elephant tower is visible in the area of the chimneys. This visibility would change with the seasons and would only be apparent in mid-winter when the trees will have lost all their leaves. The visibility is considered to be limited, tempered by the quality of the design which would be complementary to the historic buildings, and is not considered to be harmful in the context of the conservation area.
318. The proposed development would not compromise proposed view 3 (the linear view of St Paul's Cathedral along Camberwell Road) in the draft NSP.
319. Policy 7.7 of the London Plan states that tall and large buildings should incorporate publicly accessible areas on the upper floors, where appropriate. A number of responses to public consultation on the application raise concerns that no such areas would be provided. Whilst this is noted, the proposal includes a number of tall buildings and this aspect of the policy seeks to secure public benefits within the body of tall and large buildings. Such a facility would require a separate and bespoke access for the public and would involve additional cores including associated control which is not appropriate within the residential towers and would in any event, be outweighed by the wider and substantial public benefits that flow from the development. The substantial public benefits of this proposal would be accessible from the ground and would include the new underground station and the publicly accessible upper levels of the shopping centre itself which would offer elevated views across the city, and elevated facilities for visitors to the area.
320. Officers do not consider that the visibility of the scheme causes any harm given its high quality urban and architectural design.

Comments of the Design Review Panel (DRP)

321. The scheme was reviewed by the Southwark DRP on two occasions, in September 2015 and again in May 2016. At their final presentation to the Panel, the Panel concluded that they generally endorsed many aspects of the proposal and welcomed the involvement of Allies and Morrison on these two important sites. At the time the Panel retained concerns about the scale and design of the court at the centre of the east site, the permeability across the shopping centre site, the visibility of the transport hubs (the Underground and the railway station), and the height of the proposed tower on Oswin Street (W1).

Density

322. The central location of the site and its high public transport accessibility level (PTAL) of 6b is such that table 3.2 of the London Plan would support a development density of approximately 1,100 habitable rooms per hectare (hrh). Policy 3.4 of the London Plan and guidance within the Mayor's Housing SPG acknowledges that within opportunity areas large sites may determine their own character in terms of residential density, and may exceed ranges within the London Plan density matrix where it is justified by exceptional design quality.
323. With regard to Southwark policy, strategic policy 5 of the Core Strategy expects residential developments in the central activities zone to fall within the range of 650-1,100 habitable rooms per hectare. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes, and requires areas of non-residential space to be divided by 27.5 to create an equivalent number of habitable rooms per hectare. Neighbouring residents have raised concerns that the proposal would represent a significant over-development of the site.
324. Based on the Southwark Plan methodology for mixed-use developments, the density of the proposed development would equate to 1,512 habitable rooms per hectare, in excess of the London Plan range (it would equate to 1,761 hrh on the east site and 1,221 hrh on the west site). The Council's Residential Design Standards SPD also requires accommodation to be of an exemplary standard where density ranges would be exceeded, although there is a need to optimise the use of land. The proposal would result in a good standard of accommodation, although not all aspects of the housing could be described as 'exemplary' – this is assessed further later in the report. It is considered that the proposal would be of an appropriate height and set with an acceptable amount of public realm. Although there would be adverse impacts upon daylight and sunlight to neighbouring properties, this must be weighed in the balance with all of the benefits arising from the scheme. When all of the benefits and disbenefits are taken into account, it is not considered that exceeding the density threshold would warrant withholding permission in this instance.

Affordable housing

325. The **NPPF** requires local Planning Authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community and to set policies for meeting this need on site. Whilst it does not identify specifically Discount Market Rent within its definition of Affordable Housing it does include "other low cost homes for ... intermediate rent".
326. **London Plan** policy 3.8 sets out the requirement for developments to ensure a genuine choice of homes that are affordable and to meet the requirements for different

sizes and types of dwellings. In particular it states that boroughs should ensure that positive and practical support to sustain the contribution of the Private Rented Sector (PRS) is provided in addressing housing needs and increasing housing delivery. Further it identifies the provision of affordable family housing as a strategic priority in LDF policies

327. LP policy 3.9 seeks to ensure the promotion of mixed communities balanced by tenure and household income. And LP policy 3.10 defines affordable housing by reference to Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. The supporting text states that “ Increased provision of intermediate housing is one of the ways in which the supply of affordable housing can be expanded”. LP policy 3.12 sets out the requirement to secure the maximum reasonable amount of affordable housing having regard to a number of key factors and that policy also refers to the need to take account of development viability amongst other matters.
328. The **Mayor’s Affordable Housing and Viability SPG** provides specific guidance on Build to Rent developments recognising that they differ from the traditional build for sale model. It supports Discount Market Rent (DMR) as the affordable housing offer with a preference for such homes to be let at London Living Rent levels. However any affordable housing must include provisions to remain affordable in perpetuity.
329. The guidance includes a requirement for covenant and clawback arrangements if PRS homes are sold out of the Build to Rent sector within a minimum of 15 years. A covenant is required to ensure that the benefit of the private rented homes are secured for a minimum period. The clawback is required to ensure there is no financial incentive to break the covenant. The Mayor’s Housing Strategy seeks to increase the number of homes built as well as ensuring the provision of genuinely affordable housing. The Strategy supports the provision of intermediate rented homes.
330. **Core Strategy** SP6 requires that affordable housing is provided on all residential developments (of 10 units or more) . This should be in the form of social rented and intermediate housing. Developments should provide as much affordable housing as is financially viable. Developments with 10 or more units should provide a minimum of 35% affordable housing. Within the Elephant and Castle Opportunity Area the affordable housing provision should be on the basis of 50% intermediate and 50% as social rented.
331. It is anticipated that the Core Strategy will be superseded by the **New Southwark Plan (NSP)** towards the end of 2018. The draft submission version will be subject to Cabinet and Full Council approval together with a consultation period expected to run until the end of February. The Examination in Public is scheduled for mid 2018.
332. A new policy P4 is proposed in relation to PRS which amongst other matters will require a minimum of 35% homes to be affordable with three categories of rentals :

| % total housing | % total Aff Hsng | |
|---|------------------|-----|
| 1 Social rent equivalent | 12% | 34% |
| 2 Affordable rent capped at London Living Rent equivalent | 18% | 52% |
| 3 Affordable rent for household incomes between £60,000 and £90,000pa | 5% | 14% |

333. This policy is a material consideration although currently it has limited weight. The

policy is being introduced in recognition of the contribution PRS can make towards meeting the housing needs of residents who cannot afford to or do not want to buy private homes in Southwark. This sector has the potential to provide high quality professionally managed accommodation which gives a greater level of security for tenants with minimum 3 years tenancies.

The Elephant and Castle SPD (2012)

- 334. The requirement for new developments to provide a minimum of 35% affordable homes is re-stated within this document. Affordable housing is noted as comprising social Rented, Intermediate and Affordable rented housing.
- 335. Intermediate Housing is defined as housing at prices and rents above those of social rented but below private housing prices or rents. It can include part buy/part rent, key worker housing and intermediate rent housing

Affordable Housing proposal

- 336. Alongside a new shopping centre, a new campus for LCC/UAL and other uses the redevelopment of the shopping centre and LCC site proposes a number of residential towers and blocks which provide a total of 979 residential units. The development would be entirely PRS (Private rented sector) also known as a Build to Rent product.
- 337. The proposal is to provide 36% affordable housing based on habitable rooms amounting to 342 units. This would be provided in the form of Discount Market Rent (DMR). This element of the scheme will be provided 'in perpetuity' as confirmed in the Affordable Housing Statement addendum July 17.
- 338. Core Strategy SP6 did not envisage PRS as a form of housing and consequently it does not address affordable housing requirements for this type of housing tenure. The proposal therefore in this respect does not accord with this part of the adopted development plan in Southwark. The NSP will address this specifically in draft policy P4. However, this emerging policy has limited weight given the current state of the plan process, The development plan includes the London Plan which advocates some flexibility in approach to ensure the maximum reasonable affordable housing.
- 339. The Mayor's Affordable Housing and Viability SPG explicitly recognises that discount market rent (DMR) is an appropriate affordable housing tenure to be provided in PRS developments. The Mayor considers the rent level on DMR should 'preferably' be pegged to London Living Rent (which is intended to be affordable to households with an income up to £60,000).. The Mayor's household income threshold for affordable housing spans incomes up to a maximum of £90,000. However, the 2016/17 Annual Monitoring Review (AMR) states households with incomes between £60,000 and £90,000 should have their affordable housing needs met through intermediate for sale housing (i.e. shared ownership and discount market sale). The costs, including service charges for all intermediate rented products (including London Living Rent, Discounted Market Rent, Affordable Private Rent and Intermediate Rent) should be affordable to households on incomes of £60,000 or less. Officers recognise the emerging policy P4 is not consistent with the Mayor's position on intermediate rent.
- 340. The proposal at 36% exceeds the minimum requirement of 35%.
- 341. However, the proposed tenure split does not satisfy the policy requirements set out in SP6 as there is no traditional social rented accommodation provided. In addition the

distribution of rental levels does not conform to either emerging policy P4 or the Mayor's preference for a majority of rents at London Living rent levels but not in excess i.e. not in the £60,000-£90,000 household income bracket.

342. The ownership and management of the DMR affordable housing would be retained by the applicant's shareholders, as long term investors. There would be no Registered Social landlord although the developer is in the process of seeking Registered Provider status which would allow Grant to be applied if such were available and awarded.
343. The proposal is for the affordable housing to be distributed across both the east (first phase) and west (second phase) parts of the application site i.e. the existing shopping centre site and the LCC site respectively. On the east site the affordable units would be provided in two towers on the southern 'block' E3 with 86 units provided in each tower i.e. a total of 172 units. These would be a mix of unit size to reflect the policy requirement.
344. Within the 2nd phase, west site, a total of 170 units would be provided with a mix heavily dominated by 2 bed units (77%) and all within the tower 3 of block W2 – the site of the existing LCC building.
345. The overall provision of affordable housing would be as follows:

| Unit Type | Units | Unit Mix |
|-----------|-------|----------|
| 1 bed | 98 | 29% |
| 2 bed | 217 | 63% |
| 3 bed | 27 | 8% |

346. The units would be tenure blind and the facilities provided, e.g amenity space, childrens' play space, refuse, cycle storage etc will be equally available to all residents.

Rents and Income Thresholds

347. There are a range of rental levels proposed, 7 in total, linked to household incomes. These start at £20,000, in bands of £10,000, up to £90,000 (GLA income threshold). Broadly speaking the Band A is Social rent equivalent and jointly Bands B,C & D equate to London Living Rent.

Household Income Bands

348.

| | A | B | C | D | E | F | G |
|---------|---------|---------|---------|---------|---------|---------|---------|
| Low | - | - | - | £50,001 | £60,001 | £70,001 | £80,001 |
| Mid | £20,000 | £30,000 | £40,000 | £55,000 | £65,000 | £75,000 | £85,000 |
| High | - | - | - | £60,000 | £70,000 | £80,000 | £90,000 |
| Units | 33 | 53 | 53 | 33 | 59 | 52 | 59 |
| AH% age | 10% | 15% | 15% | 10% | 17% | 15% | 17% |
| P4 req | 34% | B+ | C+D | 52% | E + | F+G | 14% |

349. Within the Elephant & Castle Opportunity Area the policy requirement as set out in Core Strategy SP6 is for a tenure split of 50:50 between social rented and intermediate. The rental distribution set out above does not accord with this stipulation.
350. As a DMR product it is possible to compare the proposed tenure in terms of rent levels but the tenancies are not comparable as many of the terms vary. The tenancies are based on three year leases which can be renewed. These are assured shorthold tenancies but with more favourable terms than the minimum requirement where there is no right to renew or requirement for a lease longer than 12 months. This is in contrast to a 'secure tenancy' which is what Social Rent tenants have.
351. The social rent equivalent units would be allocated in line with the Council's nominations system and to people on the Council's housing list. Currently that would relate solely to nominations for social rented units although in the future there will be an intermediate housing list and nominations from this list would be the basis of allocating the other affordable units.
352. Although the units would be comparable to other affordable units in terms of rent levels the nature of the tenancies is somewhat different. All the DMR tenancies will be based on 3 year leases which can be renewed and with a tenant only break. One other key distinction proposed is that eligibility based on income would be reviewed on renewal of leases (other than for the social rented equivalent units). Whilst this is different to tenancy terms with affordable housing providers it does provide the benefit of ensuring more turnover and availability within this tenure. It will also assist the application of any clawback to increase number of units in the lower rental bands (see below).
353. The rents themselves would be inclusive of service charges. Indicative typical rents for the scheme have been identified as follows:

Indicative Gross Affordable Rental levels – July 2017

| W2 – T3 | A | B/C | D | E | F | G |
|---------|------|------|------|------|------|------|
| 1 bed | £160 | £252 | £349 | £413 | £498 | n/a |
| 2 bed | £175 | £280 | £349 | £413 | £476 | £539 |
| 3 bed | £190 | £308 | £349 | £413 | £476 | £539 |
| E3 – T2 | | | | | | |
| 1 bed | £160 | £205 | £349 | £406 | n/a | n/a |
| 2 bed | £175 | £227 | £349 | £413 | £476 | £525 |
| 3 bed | £190 | £308 | £349 | £413 | £476 | £539 |
| E3 – T3 | | | | | | |
| 1 bed | £160 | £205 | £349 | £408 | n/a | n/a |
| 2 bed | £175 | £227 | £349 | £413 | £476 | £528 |
| 3 bed | £190 | £250 | £349 | £413 | £476 | £539 |

354. Acknowledging the limited weight to be applied to emerging policy P4 and in the absence of an adopted policy (in the Core Strategy) that addresses PRS and DMR as a means of Housing and Affordable housing provision nonetheless it is worth considering the proposal against these emerging tenure split requirements. As drafted, in relation to affordable provision requirements of a minimum 35%, the policy seeks a breakdown of 34% Social rent equivalent; 52% London Living Rent equivalent and 14% GLA income levels.

355. The application proposes 50% of the affordable habitable rooms to be at rents consistent with or below the London Living Rent. Of that 50% about one fifth would be at a rent equivalent to social rent.
356. Hence overall the breakdown of the affordable component would be:
- 10% social rent equivalent,
 - 40% up to London Living Rent equivalent and
 - 50% at affordable rent levels for household incomes of between £60,000 to £90,000pa (reflecting the upper limit of the Mayor's income threshold for intermediate housing.)
357. This fails to meet the requirements of the emerging policy tenure split requirements. The applicant has sought to ensure that a minimum of 35% policy compliant affordable is provided but for viability reasons it is submitted that the tenure split as proposed by emerging policy P4 cannot be met. The applicant states that adhering to the proposed P4 tenure split would result in a reduction in the overall quantum of affordable housing based on viability. With a tenure compliant split i.e. 34% Social rent equivalent; 52% London Living Rent equivalent and 14% GLA income levels the overall quantum of affordable housing (DMR) would be in the region of 26 -27%.
358. The above analysis therefore indicates that, subject to consideration of viability, there would be a material conflict with the development plan in respect of the form and mix of the affordable housing offer. The tenure split breakdown is also out of step with the expectations in the emerging policy.

Viability

359. Before reaching an overall assessment of the affordable housing offer against the development plan policy expectations and other material considerations in emerging policy, it is necessary to consider viability.
360. A Financial Viability Appraisal (FVA) was submitted by the applicant to support this position and the Council engaged its own experts to scrutinise and assess the submitted FVA. As part of that exercise and following extensive discussions and negotiations an agreed position has been reached and a revised FVA submitted. On the basis of the revised FVA the conclusion is that the applicant's Affordable Housing proposal, as set out above, is the maximum amount of affordable housing that is financially viable.
361. Extensive discussions have taken place in order to arrive at an agreed position in relation to the financial viability of the scheme. Much of this has centred on matters relating to the Internal Rate of Return (IRR) the comparable expression of profit level for a Build to Rent development as opposed to build for sale. Other issues which have been the subject of discussion have been the valuation of the shopping centre itself and construction costs to name but two.
362. The Council's valuation experts have advised that the applicant's offer of 36% affordable housing (DMR) could be achieved with a fully compliant tenure mix but predicated upon an initial IRR of 6.50%, which, through rental growth and cost management over the construction period, would be in the order of 10 to 12 % upon practical completion.

363. The applicant's approach is to base the offer on an initial IRR of 7.15% (applicant's view of current rate vs 6.5% advised above) which will allow for 36% affordable housing but with a tenure mix that has just 50% in the lowest 4 income bands. To increase this affordability to 86% in these income bands, in accordance with emerging policy P4, the IRR would need to increase over time to 10 -12%. The applicant's position is for this predicted uplift to be secured by a clawback review mechanism in the S106 agreement. Such a review mechanism would need to be both sophisticated and robust to maximise the level of affordable units that is both reasonable and viable.
364. The Applicant has conceded that 7.15% initial IRR plus annual growth to 11.00% over the construction period is acceptable. All current forecasts suggest that this growth in IRR over the construction period is achievable and possibly conservative. Based upon current market data the advice is that there appears to be no reason why this approach could not deliver a fully compliant scheme. This is based on predicted growth rates and because it is predicted rather than actual the applicant therefore wishes to rely on the review mechanism due to the risk involved where the affordable housing would be based on a predicted IRR.
365. The essential difference concerns the burden of risk. A policy compliant scheme is not viable at an IRR of 6.50 - 7.00 % whereas it is at 11.00 %.
366. It is clear that the development plan expectations for affordable housing need to take account of viability. The maximum reasonable amount of affordable housing is assessed taking account of viability.
367. Officers are satisfied in the light of the viability testing outlined above that the Applicant's affordable housing offer (coupled with the securing of an appropriate review mechanism – see below) represents the maximum reasonable affordable housing provision taking account of the need for the Council to apply its affordable housing requirements with some appropriate flexibility in accordance with the Mayor's emphasis in the London Plan to ensure that the scheme as whole is deliverable.
368. The full financial viability appraisal that supports the offer, together with the executive summary, is published in full prior to the determination of the application by Planning Committee.

Covenant

369. The emerging policy P4 requires that the housing be secured for the rental market for a minimum 30 year term. This is a longer term to secure than the Mayor's 15 year minimum. Sale of any private rented homes from the PRS within this 30 year period would trigger a clawback mechanism resulting in a penalty charge towards affordable housing. The objective of this penalty is as set out in the Mayor's SPG noted above.
370. The applicant had indicated resistance to this requirement originally preferring the minimum 15 year period set out in the Mayor's SPG. They have however revised their position and now propose a minimum covenant period of 20 years. The justification for this position is based on a view, in the absence of evidence given this is a new type of housing provision, that, other than for major institutional investors or landed estates, a covenant in excess of 15 -21 years would disincentivise investors. As the first PRS scheme in the borough, the applicant suggests, it would be preferable to have the covenant set at 20 years. It is also suggested that, based on US experience, a secondary market is likely to emerge so that disposal en-bloc, where it occurs, is more likely to go to other operators rather than being broken up into individual sales. The

objective of the covenant which is to ensure the borough benefits from the high quality PRS stock for a minimum period and to discourage investors without a genuine long-term commitment to the private rental market would still be met in that event.

VIABILITY REVIEW

371. In view of the fact that the affordable housing which at 36% exceeds a compliant quantum of 35% but has a non-compliant tenure split, and in line with the Council's Development Viability SPD, a viability review (VR) would be required. This is to ensure that if the economic circumstances of the scheme change in the future an improved tenure split can be achieved in order to be more closely if not fully compliant with policy. The number and timing of any VR would need to reflect the complexity of the scheme in relation to the lengthy construction period and the phasing, of and within the east and west sites, and the phasing of occupation. These details have yet to be determined but will be secured within the S106 legal agreement.
372. Whilst separate reviews will be required for each of the east the west sites the number and timing of reviews has yet to be agreed. Whilst matters such as build costs will be confirmed prior to completion (of each phase) any revenue figures would only emerge following occupation. These factors need to be reflected in the structure of any review mechanism which, bearing in mind the annual monitoring that needs to be undertaken, may need to allow for a number of reviews for at least a limited initial period. The objective is to capture the performance of the scheme over the first few years and lease cycles to ensure a fair uplift and apportionment for the delivery of the maximum reasonable level of affordable housing. This will be a complicated process to reflect the nature of this unprecedented form of affordable housing in the borough. In essence there needs to be a sophisticated and robust review mechanism in place which should, at the very least, incorporate the following:
- Annual reviews post completion based upon actual performance
 - Phasing of review/s to align with completions on site
 - A mechanism to facilitate movement of tenure types within the development
 - A final review 5 years after completion (of each site) once the scheme has stabilised.
373. Equally the apportionment of any uplift has yet to be determined as well as the specifics of how it would be applied. The Council's Development Viability SPD suggests that the apportionment of any uplift would be based on a 50:50 split. Any uplift above the agreed IRR of 11%, as set out in the final FVA, would be applied to increase the percentage of affordable units at the social rent equivalent and London Living rent equivalent units with the aim of getting closer to a policy compliant level. The ability to apply the uplift in this way has some challenges dependent on the level of occupation and the availability of vacant affordable units which can be offered at the lower rent levels. Worked examples need to be explored to ensure that any drafting within the S106 is robust and will secure the objective of improving the balance of units in the lower rent levels thereby improving the tenure split closer to that set out in the emerging policy P4.
374. In the event of an uplift in value on the east site the option to vary the tenure on the west site may present itself prior to occupation of the later phase depending on timing. The need to rely on a financial contribution where units are not available is to be avoided.

375. In line with emerging policy the Social rent equivalent units will be filled from Council nominations. All other DMR units will be filled from a new Intermediate housing list which is currently being consulted on but should be in place well in advance of the completion of the first phase which is 3 – 5 years away.

OBJECTIONS

376. A number of objections have been received in respect of the provision of PRS/ DMR as affordable housing suggesting that there is an unproven need for this form of housing. The Council recognises that there is support for an institutional private rented sector (BtR – Build to rent) at the national, regional and local level. The Government's White Paper *Fixing Our Broken Housing Market* (2017) made a clear commitment to support the growth of the B2R sector. The adopted London Plan (2016) and Affordable Housing and Viability SPG (2017) both state clear support for the BtR sector. Southwark Council's Housing Strategy (2015) and emerging New Southwark Plan both encourage and support the institutional private rented landlords where this provides better standards. Linked to this is an acknowledgement that the proportion of households which rent privately has grown considerably over the last couple of decades. The support for the institutional private rented sector is to drive up standards in the private rented sector and to allow more choice to private renters. The Council only support s BtR schemes where clear benefits for renters such as longer tenancies than the statutory minimum are offered.
377. A further benefit of supporting BtR is that it will contribute additional homes towards Southwark's housing supply. Southwark has a housing target of 2,736 homes per year. Despite granting enough planning permissions, the average number of homes completed is closer to 1,500 homes per year.
378. As private rents and house prices inflation have outpaced wage growth, the number and proportion of households in need of affordable intermediate housing has grown. This has resulted in the local household income eligibility criteria for intermediate housing in London to qualify households with household incomes up to £90,000.
379. The South East London Borough Strategic Housing Market Assessment (2014) makes a clear case for the need for more intermediate tenure homes. Due to high house prices on the open market the intermediate "gap" between social rented and open market prices is very wide in Southwark. This is particularly the case for three- and four bedroomed dwellings. The report found net annual affordable housing need is assessed at close to 800 units per annum. More than half of the requirement for affordable housing is estimated to be for the intermediate segment (57%). This clearly supports the position that DMR meets an affordable housing need in Southwark.
380. The objection further argues that the affordable housing element of the proposed scheme does not meet the Core Strategy requirement because it does not provide conventional social rent homes as required by the Core Strategy. However, the proposal does provide 'social rent equivalent' homes that are let at a rent that is equal to conventional social rent homes (in accordance with the HCA Rent Standard Guidance (2015)).
381. The representation further argues that the proposal does not meet the affordable housing requirement for BtR schemes as set out in the New Southwark Plan. This is dealt with above and whilst it is correct that the proposal does not meet the DMR affordable housing requirement in terms of distribution of discounts, it does provide 36% affordable housing overall. The proposed distribution of discounts has been

adjusted to account for the viability of the scheme. The affordable housing requirements set through local plans are, as required by the NPPF, subject to viability. Any grant of planning permission would be subject to a viability review that would seek to improve the affordable housing offer to reflect any improvement in scheme viability.

382. The representation argues that the eligibility requirement for affordable housing is inequitable because it restricts access to 'economically active' households. Firstly, it should be noted that this condition does not apply to the social rent equivalent homes. The DMR homes with shallower discounts are intermediate households intended to meet the needs of households who fall into the 'gap' between social housing and market housing. Eligibility will be determined in accordance with Southwark's Intermediate Housing List. There is a requirement for households to be 'economically active' in order to ensure they are able to afford the rent. This principle applies to other types of intermediate housing including shared ownership.
383. The representation argues that the difference in rental levels within the DMR element based on tenants' incomes is inequitable. Access to DMR homes provided at social rent equivalent will not be means-tested. Access to the less heavily discounted homes will be. This improves the viability of the scheme, thereby enabling a greater overall proportion of affordable homes to be provided. It also ensures that suitable affordable homes can be provided for households on a range of incomes which cannot afford full market value and may not access social rent or social rent equivalent housing.

Conclusion on affordable housing

384. The proposal is for a new form of affordable housing which has not previously been provided in Southwark. However it is a form of affordable provision which is being recognised as making a useful contribution to addressing housing need. Notwithstanding the extent to which the affordable housing provision is contrary to some elements of the development plan notably the Core Strategy, officers are satisfied that the provision is the maximum reasonable and that it is in overall conformity with the development plan taking account of scheme viability.

Mix of dwellings

385. Policy 3.8 of the London Plan 'Housing choice' requires new developments to offer a range of housing choices in terms of the mix, housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these. Strategic policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% of the units with two or more bedrooms, at least 10% of the units with three or more bedrooms within the opportunity area, and no more than 5% studio units which can only be for private housing. The proposal would deliver the following mix of units:

| Mix | Units | % |
|--------------|------------|------------|
| Studio | 16 | 1.6 |
| 1-bed | 316 | 32.3 |
| 2-bed | 528 | 53.9 |
| 3-bed | 117 | 12 |
| 4-bed | 2 | 0.2 |
| Total | 979 | 100 |

386. The proposed development would be policy compliant in terms of its unit mix, with

1.6% studio units, 66% 2+ bed units and 12% 3+ bed units.

387. Both parts of the site would also be policy compliant in terms of its mix; the east site would comprise 2.5% studios, 61.3% 2+bed units and 13.1% 3+bed units, and the west site would comprise 0.8% studio units, 70.6% 2+ bed units and 11.2% 3+ bed units.

Wheelchair accessible Housing

388. Policy 3.8 of the London Plan 'Housing choice' requires ninety percent of new housing to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings', and ten per cent of new housing to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. Designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
389. The proposed development would comply with the London Plan requirement, and a condition to secure this is recommended. Each site would also be policy compliant in respect of wheelchair accessible and adaptable housing.

Quality of accommodation

390. Policy 3.5 of the London Plan requires housing developments to be of the highest quality internally, externally, and in relation to their context and to the wider environment. They should enhance the quality of local places, incorporate requirements for accessibility and adaptability, and minimum space standards. In terms of Southwark policy, saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. The Council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels and the units should be dual aspect to allow for good levels of light, outlook and cross-ventilation.

Privacy

391. The Council's Residential Design Standards SPD recommends a minimum of 21m distance between the rear elevation of properties and 12m distance between properties that face one another, including across a highway.

Privacy

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East site

393. There would be acceptable levels of privacy, with 12m between towers 1 and 2 and 20m between towers 2 and 3. The towers would face each other across Park Route and a communal garden.

West site

394. The relationships between the proposed residential blocks on the west site would be closer, the closest of which being 8m between tower W1 and the proposed mansion block. A combination of bedrooms and living spaces would face each other across

what would become a new street, and the separation distance would be below the SPD recommendation. As such a condition is recommended requiring details of obscure glazing or another device to maintain light levels and privacy to be submitted for approval. There would be 11m between towers W1 and W2 and between residential windows facing each other across Pastor Street, only just below the recommended 12m which is considered to be acceptable. There would be 18m between towers W2 and W3, which would face each other across a communal garden.

Aspect

East site

395. The majority of units (60.3%) on the east site would be dual aspect, comprising 70.5% dual aspect units to tower 1, 54.4% to tower 2 and 50.7% to tower 3. The single-aspect units would predominantly face south and west, and none would be north-facing. It is noted that within towers 2 and Tower 3 some units have been identified as single aspect, which would have a dual aspect room.

West site

396. Again the majority of units (80.6%) on the west site would be dual aspect, comprising 96% dual aspect for tower W1, 95% for towers W2 and W3, and 67.2%% for the mansion block. None of the single-aspect units would be north-facing.

Unit sizes

East Site

| Units | Overall unit size sqm | SPD minimum sqm | Amenity space sqm | SPD minimum sqm |
|--------------|----------------------------------|----------------------------|------------------------------|----------------------------|
| 1-bed | 50 – 69.7 | 50 | 0 – 4.4 | 10 |
| 2-bed | 69.8 - 106 | 61-70 | 0 – 4.4 | 10 |
| 3-bed | 100.4 – 115.5 | 74-95 | 4.4 | 10 |

West Site

| Units | Overall unit size sqm | SPD minimum sqm | Amenity space sqm | SPD minimum sqm |
|--------------|----------------------------------|----------------------------|------------------------------|----------------------------|
| 1-bed | 50 – 70.6 | 50 | 0 – 36.6 | 10 |
| 2-bed | 63.9 – 87.1 | 61-70 | 0 – 22.8 | 10 |
| 3-bed | 87.5 – 110 | 74-95 | 5 - 38.8 | 10 |
| 4-bed | 133.2 | 90-117 | 7.7 | 10 |

397. All of the units would comply with the minimum floor areas set out in the Residential Design Standards SPD, including for storage space. There would also be a number of internal communal spaces to serve the proposed units, which could potentially be used as lounges, shared kitchens or fitness centres.

Internal light levels

398. A Daylight Assessment based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using

the Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. For APSH the BRE guidance notes that the main requirement for sunlight is in livingrooms, and recommends that they receive at least 25% of the total annual total, 5% of which should be received during the winter months. Given that the results would improve higher up the buildings, only the lower floors (approximately a third of each building) have been tested.

East site

399. Of the windows tested, 81.6% on the east site. Those which would not meet the recommended level would be open plan living spaces with ADFs ranging from 0.74% to 1.98%.

West site

400. 63.3% of the windows tested would pass in relation to ADF. Those which would not would be open plan living spaces with ADFs ranging from 0.41% to 1.95% and bedrooms ranging from 0.2% to 0.93%.

Annual Probable Sunlight Hours

East site

401. Of the windows tested, 38% would comply with the guidance in relation to APSH and 74% for the winter hours. Of those which would not comply this would be caused by shading from the balconies and from surrounding buildings. There would be no rooms which would not receive any sunlight.

West site

402. Of the windows tested, 72% would comply with the guidance in relation to APSH and 76% for the winter hours. Of those which would not comply there would be seven livingrooms which would not receive any sunlight, owing to the rooms being served by deep balconies and their window positions relative to one of the neighbouring proposed buildings.
403. Given the highly urbanised location of the site and the number of units proposed it is recognised that not all units would comply with the BRE guidance. However, these would be a limited number on the lower floors and some would be affected by balconies to the units.

Amenity space

404. Section 3 of the Residential Design Standards SPD sets out the Council's amenity space requirements for residential developments and states that all flat developments must meet the following minimum standards and seek to exceed these where possible:
- 50sqm communal amenity space per development;
 - For units containing three or more bedrooms, 10sqm of private amenity space;
 - For units containing two or less bedrooms, 10sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private

amenity space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement;

- Balconies, terraces and roof gardens must be a minimum of 3sqm to count towards private amenity space.

East site

405. The majority of the units would have access to private amenity space in the form of balconies, although the 3-bed units would only have 4.4sqm of amenity space and 10sqm is required, and 16 units would have no private amenity space at all. The overall shortfall in private amenity space across this part of the site would be 454.7sqm which would be made up for in the communal provision, with 4,506sqm proposed for this part of the site which is described in the Trees and Landscaping section of this report.

West site

406. Again, the majority of the units would have private amenity space in the form of balconies, terrace and private gardens to the mansion block units fronting Oswin Street. It is noted that not all of the 3+bed units would have 10sqm of private amenity space, with some only having 5sqm, and 20 units would have no private amenity space at all. The shortfall in private amenity space would be 386.4sqm on this part of the site which would be made up for through the communal provision in accordance with the approach set out in the Residential Design Standards SPD; there would be 1,640sqm of communal amenity space for this part of the site.

Childrens' playspace

East site

407. All of the children's playspace requirements for the east site would be met on-site, in accordance with guidance in the GLA's Informal Play and Recreation SPG. A condition requiring details of the play equipment to be submitted for approval is recommended, which would need to be provided prior to the occupation of the dwellings.

West site

408. There would be a shortfall of 336sqm of children's playspace on the west site, therefore in accordance with the Council's Planning Obligations and CIL SPD a contribution of £50,708.82 would be required, and this has been included in the draft s106 agreement.

Units per core

409. The London Housing Design Guide advises that there should be no more than 8 units per core, with two lifts per core from seventh floor level upwards.

East site

410. Tower 1 would have a maximum of 9 units per core, although it would be served by three lifts and the interlocking square footprint which would form the tower means that there would be no long corridors. Towers 2 and 3 would have a maximum of 8 units per core, both served by two lifts.

West Site

411. Towers W1 and W2 would have a maximum of 6 units per core, served by two lifts; tower W3 would have a maximum of 6 units per core, served by 3 lifts. The mansion block would have a maximum of 8 units per core served by two lifts.

Internal noise levels and vibration

412. Chapter 9 of the ES considers noise and vibration. It has two strands, the first of which considers the suitability of the site for residential and educational uses which is relevant to the quality of the proposed accommodation. The second strand is an assessment of the likely significant noise and vibration effects which would arise from the proposed development, and this is considered separately below.
413. With regard to noise levels, British Standard and World Health Organisation guidelines have been used to determine appropriate noise levels within the residential units, and best practice guidance has been used in relation to the proposed new LCC building. Baseline noise levels were established through surveys conducted in 2014, 2015 and 2016, and the latter took into account the effects of the reconfigured road layout. The survey data does not take into account an increase in train frequency from the overground station. The ES advises that this is because the change in rail movements is not yet known, and that in the long term a change in noise levels of less than 3dB would be imperceptible, which would equate to a doubling in the number of train movements. The survey methodology was agreed with the Council's Environmental Protection Team (EPT) as part of the EIA scoping process, and the results show that the site is dominated by road traffic noise, with some rail noise on the east site.

East site internal noise levels

414. The ES advises that maximum acceptable noise levels would be exceeded on the facades of towers E1, E2 and E3 during both the day and night except for the rail façade of tower 3 which would fall within acceptable limits overnight. In light of this the ES advises that a mechanical ventilation system should be employed which would remove the need for residents to open their windows other than for purge ventilation. This would ensure that noise within the flats should fall within acceptable limits and EPT has recommended a condition to secure this which forms part of the draft recommendation – it is possible that the first five floors would need their windows fixed, but further modelling would confirm this. If the windows to the units were open, the recommended noise levels within the flats would be exceeded. A glazing specification has been provided, although this would likely change as the scheme progresses, and further testing has also been carried out in relation to noise from Corsica Studios which is considered separately below. The ES advises that if a mechanical ventilation strategy were also implemented for the new LCC building, noise levels to the teaching areas would fall within acceptable limits.
415. A condition is also recommended limiting noise from plant associated with the proposed development, which could impact upon both existing neighbouring occupiers and future occupiers of the development. A condition for good levels of sound proofing between residential and non-residential uses within the proposed development would be required, to prevent any undue noise and disturbance.

Potential noise from Corsica Studios

416. Corsica Studios is divided into two spaces, a live music area and bar, and a second, smaller studio next door, and there is an external smoking area at the rear of approximately 45sqm. Hours of operation are understood to be Sunday to Thursday 8pm to 3am and Friday and Saturday 8pm to 6am, and a review of its listings reveals that it holds events most nights of the week. The proposed development would introduce a large number of new residential units as close as 10m from the rear of Corsica Studios, and noise from the venue could cause noise and disturbance to the occupiers of the new flats. This in turn could result in noise complaints against the venue, harming its long term operation which would not be acceptable.
417. This issue is recognised in paragraph 123 of the NPPF which advises that planning policies and decisions should aim to recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established. This is reinforced by policy 7.15b of the London Plan which advises that development proposals should seek to manage noise by mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses. Further guidance is contained in the Mayor's Central Activities Zone SPG and the draft Culture and the Night Time Economy SPG. The draft SPG introduces the 'Agent of Change' concept which is the principle that the person or business responsible for the change is responsible for managing the impact of the change. This means that a residential development to be built near a live music venue, for example, would have to pay for soundproofing, while a live music venue opening in a residential area would be responsible for the costs. Responsibility for noise management is therefore placed on the 'agent of the change'.
418. The surveys undertaken to establish existing noise levels at the site including a location close to Corsica Studios. However, Corsica Studios has raised concerns that noisier events may have been taking place at other times which the surveying would not have picked up on. As such a further period of monitoring was agreed between the applicant and Corsica Studios to ensure that the most noisy events i.e. the worst case scenario, were captured. Additional surveying was undertaken in March and again in November this year to pick up its noisiest events, and given that higher noise levels have been recorded it is now proposed to address this issue by way of high performance glazing to the proposed flats together with sound-proofing works to Corsica Studios. Internal noise levels within the flats would be secured by way of a condition, and the applicant has agreed to a contribution of £125k to pay for a scheme of soundproofing to Corsica Studios, which would be secured through the s106 agreement.

East site external amenity areas noise levels

419. Noise to external spaces within the development has also been considered, including the areas of public realm and communal residential gardens. The ES predicts that some of the external communal gardens including part of the garden between towers E2 and E3 facing Walworth Road would experience noise levels slightly in excess of the recommended guidance, even with mitigation through solid balustrades and planting for example. Whilst this is noted, the site is located at a transport hub in the heart of a busy town centre and in close proximity to a railway line and busy roads it is therefore unsurprising that noise levels are high. It is also noted that future residents could use the new public park being delivered to the east of the site which is further away from the hustle and bustle of the transport hub. Noise levels within The Court

have been tested and it is predicted that they would fall within acceptable levels, largely owing to the shielding which would be afforded by the new buildings which would surround it.

East site vibration and structure borne noise

- 420. A site wide vibration report has been submitted which forms part of the ES. Potential sources of vibration include the elevated railway line and railway station, and the Northern and Bakerloo underground lines.
- 421. The ES predicts that although levels of tactile vibration would be low, there may be the potential for structure-borne noise to rise above acceptable levels. Physical vibration control measures have therefore been incorporated into the structural design of the east site development and with these in place, potential effects from London Underground lines and overground rail vibration would be imperceptible by future residents of the proposed development.

West site internal noise levels

- 422. The ES predicts that noise levels on the tower facades facing the major roads would exceed acceptable levels. Again, this could be mitigated through a mechanical ventilation strategy, details of which should be secured by way of a condition. The proposed cultural venue would need to be adequately sound-proofed which again, could be secured by way of a condition.

West site external amenity areas noise levels

- 423. The ES predicts that with no mitigation in place, some of the private balconies and communal terraces facing major transport noise sources would experience noise in excess of recommended levels. It advises that recessive balconies and solid balustrades around these areas which are shown on the plans should bring noise to within acceptable limits and again, the town centre location of the site at a busy transport hub is noted.

West site vibration and structure borne noise

- 424. The ES predicts that this would be insignificant and that the site would provide a suitable level of residential amenity with regard to vibration.

Secure by Design

- 425. A condition is recommended requiring the proposed development to achieve secure by design certification. This would help to ensure that the safety and security objectives of policy 7.3 of the London Plan and saved policy 3.14 of the Southwark Plan would be met.

Air quality to the proposed development (both sites)

- 426. With the exception of plot W3 where it would face Oswin Street, all of the residential units within the proposed development would be located above ground floor level, away from the heavily trafficked roads. However, the ES advises that the first five floors of the residential units in all of the buildings would nonetheless need to be mechanically ventilated for air quality purposes. EPT has recommended a condition requiring further monitoring to be undertaken to establish whether the first five floors is

the appropriate level, and this forms part of the draft recommendation.

- 427. The new LCC building would be both mechanically and naturally ventilated, and the other commercial uses within the proposed development would be fitted with louvres for mechanical ventilation.
- 428. The impact of the proposed heating equipment (combined heat and power – CHP) for the development on air quality has been taken into account. EPT has recommended a pre-commencement condition requiring details of the chimney stack heights and dispersal model for the CHP plant to be submitted for approval, and this forms part of the draft recommendation.

Conclusion to quality of accommodation

- 429. As set out above there would be a number of instances where the quality of accommodation would not comply with guidance, including for amenity space and privacy distances on the west site. However, overall and subject to conditions it is considered that the proposal would provide a good standard of accommodation, and would comply with the provisions of the development plan in this regard.

Trees and landscaping

- 430. Policy 7.5 of the London Plan 'Public realm' advises that London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Policy 15 of the Elephant and Castle SPD sets out the way in which the public realm in the opportunity area should be improved, including ensuring that it is generously landscaped, inclusive, well lit, uses high quality and durable materials and street furniture, reduces micro-climate impacts, and incorporates and supports biodiversity. The SPD notes the poor quality public realm that currently exists at the east site, although this has recently been much improved by the Peninsula.
- 431. Concerns have been raised in response to consultation on the application that the proposal fails to adequately consider green space. A neighbouring resident has requested that granite setts are identified in the Elliott's Row Conservation Area Appraisal and should be used on Oswin Street, together with other improvements to the street.
- 432. An Arboricultural Impact Assessment (AIA) has been submitted with the application, and landscaping for the proposed development is set out in chapter 6 of the Design and Access Statement. Concerns have been raised that the proposal does not adequately consider or provide green space within the proposed development.

Trees

- 433. Across both parts of the site there are currently 27 individual trees and one group comprising seven trees. These have been categorised and there are 3 category A (high value), 12 category B (moderate value), 9 category C (low value) and 4 category U trees (unsuitable for retention). The AIA advises that 20 trees would need to be removed in order to facilitate the proposed development, resulting in a loss of 13.08 cubic metres. However, officers have since agreed with the applicant that one additional tree on the west site would be retained.

East site trees

434. There are 11 trees on the east site comprising one category A, 4 category B, 2 category C and 4 category U trees. They are around the southern and western edges of the site and the proposal would require the removal of 3 category B, 2 category C and 4 category U trees.
435. 27 new trees would be planted in the east site public realm, most of which would be street trees focussed along Elephant and Castle, some trees along Walworth Road and New Kent Road, and two feature trees within The Court. The new trees along Elephant and Castle would help to soften the public realm and provide screening and shelter from the road.

West site trees

436. There are currently 17 individual trees on the west site comprising 2 category A, 8 category B and 7 category C trees, together with the group of seven trees which is categorised as C; these are located along St George's Road, Oswin Street and Brook Drive. The submission advises that 2 category B, 3 category C and the group of category C trees would need to be removed in order to facilitate the proposed development. However, it is considered that tree T13, a category B Beech which is located on the north-eastern side of the west site opposite the Faraday Memorial could be retained, and a condition to secure this is recommended.
437. 17 new trees would be planted in the public realm on the west site predominantly along Elephant and Castle and St George's Road, with a group of new trees at the northern end of Pastor Street to frame the entrance to this street. Two large existing London Planes on Oswin Street would be incorporated into two pocket gardens which would be created along this street (there would be three pocket parks in total). The proposed buildings would be set sufficiently far back not to compromise the retained trees, and a condition is recommended to ensure that they would be adequately protected during construction. It is recommended that clauses be included in the s106 agreement to secure the new tree planting, together with provisions for a financial contribution in the event that not all of the proposed trees can be planted following site investigations.
438. Whilst it is recognised that there would be some loss of existing trees as a result of the proposal including 4 category B trees, the most valuable would be retained, with no category A trees requiring removal. 10 additional trees would be planted in the public realm across both sites, together with 94 new trees the communal gardens on the east site and 81 on the west site, resulting in a significant increase in the number of trees on the site. They would add welcome greenery to the highly urbanised environment and would mitigate the loss of stem girth which is welcomed. A landscaping condition could secure appropriate soil volumes for public realm trees planted above basements and above ground in communal gardens and has been included in the draft recommendation.

Landscaping

439. Public realm on both parts of the site is limited at present, particularly on the east site. Changes have been made in the wider area in recent years, including the removal of the southern roundabout and subways, reconfiguration of the northern roundabout, and the creation of the Peninsula. A new public square has been delivered to the east of the shopping centre beyond the railway arches, which connects with the recently

opened first phase of Elephant Park. The proposed development on the east site would be well connected to these new public spaces.

440. The east site is a transport hub for tubes, trains and busses, and the new LCC building would be a destination for students. There would be large numbers of people moving through the site on a daily basis, therefore the public realm would need to be durable, and an attractive place both for moving through and congregating in. The height of the proposed buildings around The Court is such that this space would not comply with the BRE guidance regarding sun on the ground, although it would be less shaded during the summer months and would nonetheless be an attractive space. On the west site a mews character is proposed for Oswin Street, including three pocket gardens and private gardens to the duplex units in the Mansion Block which would front the street. Pastor Street would be a shared space, but would predominantly be for pedestrians and cyclists.
441. The outline landscaping proposals submitted with the application are considered to be of a high standard, including the use of materials such as York stone paving and natural stone. The new streets would be well-lit and lined with active frontages, helping them to feel safe and secure. A number of amendments are required however, to ensure that the landscaping would create a coherent public realm across the town centre and that it would take into account the future, permanent design of the Peninsula. There is considered to be scope for further greening of the internal streets, improvements to the planting palette and the provision of green walls, and these could be secured through the s106 agreement / landscaping conditions.

East site communal gardens

442. These would be on podiums for plots E2 and E3 and would be landscaped to form a variety of different spaces. The gardens for plot E2 would be split into different character zones including areas of tree planting, lawn and play areas, and BBQ terrace. The gardens for plot E3 would be more formal in character, and would include an outdoor gym, formal garden and sensory garden. The gardens for the two plots would be connected by a footbridge allowing residents to use both.

West site communal gardens

443. Communal gardens for tower W1 would be a terrace at level 15 which would wrap around the north-eastern corner of the building facing Oswin Street and St George's Road. Plot W2 would have a T-shaped communal garden at first floor level which would sit above the internal service yard and retail units and would be enclosed by the back of the cultural venue which would incorporate a green wall. It would serve towers W2 and W3 and would be landscaped to include a lawn and play area, groups of trees, terraces and seating areas. Both towers within this plot would also have terraces, tower W2 at 18th floor level facing the Peninsula and Pastor Street and tower W3 at 27th floor level facing the Peninsula and Newington Butts. Communal amenity space for plot W3 would be located at 5th floor level in a series of interconnected terraces. This space would be predominantly lawn, with paving and seating along the eastern side closest to Pastor Street.

Conclusion to trees and landscaping

444. A total of 20 trees would need to be removed in order to facilitate the proposed development, taking into account the tree shown for removal but which could actually be retained. Of these trees, none would be category A and only 5 would be category

B. This tree loss would be more than compensated for by significant new tree planting, both in the public realm and within the communal gardens. New areas of high quality of public realm would be created, and overall it is considered that the proposal would comply with the provisions of the development plan in this respect.

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

445. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work; saved policy 3.2 of the Southwark Plan states that permission will not be granted for development where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
446. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.
447. Concerns have been raised by neighbouring residents and local groups that the level of residential accommodation proposed would lead to significant overcrowding in the area and an unacceptable impact upon local services. These matters are considered in the transport and community infrastructure levy sections of this report.

Impact of the proposed uses

East site

448. The proposed development on this part of the site would comprise a new shopping centre, leisure uses, a new building for the LCC, a new station box for the Northern Line ticket hall and significant new residential accommodation. The most significant change compared to the existing uses would be the new LCC building, and a significant quantum of residential accommodation.
449. Given its busy, town centre location it is not considered that the introduction of a new educational facility on the east site would result in any significant loss of amenity to neighbouring occupiers. There are already large numbers of students using this part of the site to access the existing LCC building on the west site. Student activity would transfer from the west site to the east site, and although their numbers would increase, it is considered that this would be satisfactorily absorbed into this town centre site and transport hub, in accordance with saved policy 5.1 of the Southwark Plan.
450. It is not also considered that the introduction of residential accommodation onto the east site would result in any significant loss of amenity to neighbouring occupiers. Residential is a town centre use and it would sit comfortably alongside the other uses in the vicinity. The one potential exception to this is Corsica Studios and the potential for noise complaints against the venue from future occupiers. This has been

considered in the quality of accommodation section of this report.

West site

451. Concerns have been raised by neighbouring residents regarding noise and disturbance from the proposed cultural venue and from people using the pocket parks which would be provided along Oswin Street.
452. Again, given the town centre location with a broad range of uses and high levels of activity, it is not considered that the proposed uses on the west site would result in any significant loss of amenity to neighbouring occupiers. The proposed cultural venue would be positioned fronting Elephant and Castle and St Georges Road, away from the quieter residential streets to the west. It would nonetheless need to be adequately sound-proofed in order to contain amplified sound, and patrons would need to be managed when entering and leaving the premises; a sound-proofing condition is included in the draft recommendation, and a visitor management plan could be secured through the s106 agreement.
453. The uses sitting opposite the houses on Oswin Street would predominately be residential units within plot W3, and the pocket parks would be modest in size (approximately 32sqm each) and are unlikely to be used late into the evening. Plot W1 which would be located on the northern part of Oswin Street would contain a small retail unit at ground floor level which would be serviced from Oswin Street.
454. The Metropolitan Tabernacle church has a congregation of approximately 1,000 people spread across various services, including a 300-strong Sunday school. A representation submitted by the Tabernacle advises that whilst congregations enter the building from the front (Elephant and Castle), its day-to-day entrance is from the side / rear closest to Pastor Street and facing proposed plot W2. Safety concerns have been raised regarding the proximity of proposed tower W3 to the Tabernacle, and that objects have fallen from balconies and roof terraces at One the Elephant which has damaged vehicles and causes a danger to pedestrians. The objection notes that tower W3 would be closer to the Tabernacle than One the Elephant, heightening this concern and notes that adults and children use the side entrance during the week. Concerns raised by the Tabernacle relating to wind microclimate, flooding and drainage are considered in the relevant sections of this report.
455. In response to the concern regarding balconies, it is recommended that the detailed drawings condition which would require balcony details be required to include safety features for those balconies which would face the Tabernacle. This could include higher balustrades, and for the top of the balustrades to be curved rather than flat to prevent people putting objects on them.

Impact of the proposed buildings

Privacy and overlooking

456. Concerns have been raised by neighbouring residents that the proposed development would result in an unacceptable loss of privacy to neighbouring dwellings. Concerns have also been raised regarding loss of a view and impact upon property values, but these are not material planning considerations and cannot be taken into account.
457. As stated, in order to maintain privacy the Council's Residential Design Standards SPD recommends a minimum separation distance of 12m between the fronts of

buildings and any buildings which front a highway, and a minimum of 21m at the rear.

East site

Metro Central Heights

458. This predominantly residential complex is located directly opposite the east site on the northern side of New Kent Road. There are three blocks directly opposite the east site and the separation distances between these blocks and the closest development on the east site would be 42m, 37m and 31m, all well in excess of the SPD minimums. As such there would be no unacceptable loss of privacy to these dwellings. There would be a terrace on top of the LCC building and given the town centre location of the site with high existing background noise levels it is not considered that the terrace would result in any undue noise or disturbance.

Albert Barnes House

459. This part 4, part 6-storey building is located further east along New Kent Road, also on the northern side and contains a retail unit on the ground floor and flats above. The new LCC building would be located approximately 39m from this building and as such no loss of privacy would occur.

Railway Arches

460. There are no residential uses within the railway arches or other uses which are considered sensitive in relation to privacy.

Elephant One

461. This new building contains retail units and a gymnasium at ground and first floor levels, with three towers of 15, 18 and 23-storeys above containing residential and student accommodation. The new LCC building would be located 55m from this neighbouring building and as such would not result in any loss of privacy.

Strata

462. This 43 storey building is located to the south of the site on Walworth Road and contains commercial space on the ground floor and flats above. There would be a separation distance of 30m between Strata and tower 3 within plot E3, and approximately 35m between Strata and the communal gardens which would sit between towers E2 and E3. This would exceed the minimum distances set out in the Residential Design Standards SPD and given the separation distance and town centre location, it is not considered that any undue noise or disturbance would occur as a result of the communal gardens.
463. There is a 5-storey building next to Strata which contains commercial space on the ground floor and residential above. There would be a minimum separation distance of 54m between this building and proposed tower E2 and the communal gardens, well in excess of the SPD minimum standards.

Draper House

464. This 25-storey building is located to the south of the east site and contains retail space at ground floor level and flats above. There would be a minimum distance of 67m

between Draper House and tower E2 and the communal gardens, well in excess of the SPD minimums.

West site

One the Elephant

465. This recently completed 37-storey building contains commercial space on the ground and first floor and flats above. There would be a separation distance of 47m between this building and windows at the rear of proposed plot W3. There would be a separation distance of 74m between this building and tower 3 within plot W2, well in excess of the SPD minimum standards.

Metropolitan Tabernacle

466. There is a flat at the rear of this building which is understood to be occupied by staff, and which has habitable room windows which would face proposed plot W3. The separation distance would be approximately 15m to windows and terraces at the rear of the mansion block, in excess of the SPD minimum where properties face each other across a street.

Oswin Street

467. There would be a separation distance of 15m between plot W1 and the Metropolis Building which is a 4-storey building at the northern end of Oswin Street which is in residential use. There would be a minimum separation distance of 19m between windows within plot W3 and the terraced houses and flats along the remainder of Oswin Street, which would exceed the SPD minimum standard.

21 St George's Road

468. This building appears to be in commercial use. In any event the separation distance between it and tower W1 would be approximately 15m, in excess of the SPD guidance. The proposed single-storey retail pavilion to the north of tower W1 would be a similar distance from this building.

Perronet House

469. This 11-storey building contains garages, a pharmacy and a doctors' surgery at ground floor level and flats above. The flats face east and west and have views towards the Peninsula and St George's Road. There would be a separation distance of approximately 30m between this neighbouring building and tower W1, well in excess of the SPD minimum standard.
470. All of the other surrounding buildings are further away from the site and as such would not experience any loss of privacy or overlooking as a result of the proposal.

Physical impact upon surrounding businesses (impact upon businesses within the red line is considered in full in the equality implications section of this report)

East Site

Corsica Studios

471. The proposed development would result a reduction in the size of a smoking area at the rear of this premises, which is also sometimes used as a cloakroom. The area immediately beyond the smoking area would become a new public route leading from Walworth Road to The Court. There are no standards in relation to the size of smoking areas, therefore this impact would need to be managed, to limit the number of people using the smaller area.

Railway arch 113 Elephant Road

472. This unit sits between the entrance to the railway station and the existing access to the shopping centre car park. It has been subdivided and the southern is occupied by Ria, a money transfer business, and the northern part by Faktory, a Columbian restaurant; planning permission for the restaurant use was granted in February 2015 (reference: 14-AP-3954). The restaurant does not sit within the red line for the planning application, but it has a smoking area on the western side of the viaduct which does sit within the site. This smoking area would be lost as a result of the proposal and the area turned into new public realm next to the opened up entrance to the railway station; no access from the existing restaurant onto this new area of public realm is shown on the plans. The proposal would therefore impact upon the arrangements of the restaurant, but given the significant benefits which would arise from the proposal, this would not warrant withholding planning permission.

West site

Castle Leisure Centre

473. It is not considered that the proposed development would impact upon the continued operation of the leisure centre. Servicing implications are considered in the transport issues section of this report.

Daylight, sunlight and overshadowing

Daylight

474. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
475. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within an area of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This area of Elephant and Castle has been identified as an area where tall buildings are appropriate, and there are existing buildings with heights of 43 storeys (Strata), 37 storeys (One the Elephant), 44 storeys (360 Tower), 25 storeys (Draper House), up to 23-storeys over a podium (Elephant One – described as Tribeca Square in the daylight and sunlight report) and 9, 12 and 18-storeys (Metro Central Heights) within close proximity to the site.
476. The BRE sets out three detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC

recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight (VSC) can be reduced by about 20% of the original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows:

| Reduction in VSC | Level of impact |
|-------------------------|------------------------|
| 0-20% | Insignificant |
| 20-29.99% | Minor adverse |
| 30-39.99% | Moderate adverse |
| 40% + | Substantial adverse |

477. This is supplemented by the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.

478. In considering the impact upon sunlight, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. The BRE guidelines require that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than a 20% loss of its former value.

479. The ES considers the impact on the following neighbouring buildings:

- Cheam House
- Perronet House
- Brook Drive Nos. 171-193 (odd)
- Wardroper House, St George's Road
- One the Elephant
- Metro Central Heights (Public House)
- Alexander Fleming House (see note below re: address)
- Strata
- Draper House
- Elliott's Row Nos. 30-56 (inclusive), 58 and 61-68 (inclusive)
- St Georges Road Nos. 21, 35 and 58-60 (even)
- Gaywood Street Nos. 27-35 (odd)
- Princess Street Nos. 7-19 (odd)
- Oswin Street Nos. 1, 3-5 (inclusive) and 7-41 (odd)
- Hayles Building Nos. 1-84
- Metro Central Heights Nos 1-413
- Dante Road Nos. 2 and 6-10 (even)
- Walworth Road Nos. 80-92 (even)
- Arch Street Nos. 26 and 28

- Tribeca Square West Tower (Elephant One)
- Tribeca Square South Tower (Elephant One)

480. The daylight report has considers a large number of rooms around the site. It assessed 6220 residential windows serving 4092 rooms. Of the 6220 windows assessed, 4751 (76%) would satisfy the BRE recommended levels for VSC.

481. Of the 4092 rooms assessed, 3667 (90%) would meet the BRE standards for NSL. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is set out below:

Existing baseline V. Proposed Vertical Sky Component and cumulative ()

| Property | No. of windows tested | No. retaining at least 80% of their baseline value | No. with minor adverse impact of up to 30% reduction in VSC | No. with moderate adverse impact of between 30%-40% reduction in VSC | No. with substantial adverse impact of over 40% reduction in VSC |
|--|-----------------------|--|---|--|--|
| Cheam House | 22 | 22 (22) | 0 (0) | 0 (0) | 0 (0) |
| 2 Dante Road | 24 | 24 (24) | 0 (0) | 0 (0) | 0 (0) |
| Perronet House | 270 | 237 (195) | 12 (38) | 11 (21) | 10 (16) |
| Brook Drive Nos. 171-193 (odd) | 82 | 77 (77) | 3 (3) | 2 (2) | 0 (0) |
| Wardroper House | 15 | 15 (15) | 0 (0) | 0 (0) | 0 (0) |
| One the Elephant | 923 | 669 (649) | 132 (128) | 70 (77) | 52 (69) |
| Metro Central Heights (Public House) | 65 | 31 (24) | 0 (4) | 23 (23) | 11 (14) |
| Alexander Fleming House | 154 | 73 (67) | 39 (36) | 25 (27) | 17 (24) |
| Strata | 761 | 652 (562) | 33 (40) | 37 (100) | 39 (59) |
| Draper House | 574 | 571 (451) | 2 (63) | 0 (33) | 1 (27) |
| Elliott's Row Nos. 30-56 (inclusive), 58 and 61-68 (inclusive) | 267 | 263 (263) | 4 (4) | 0 (0) | 0 (0) |
| St Georges Road Nos. 21, 35 and 58-60 (even) | 66 | 61 (61) | 5 (1) | 0 (4) | 0 (0) |
| Gaywood Street Nos. 27-35 (odd) | 37 | 37 (37) | 0 (0) | 0 (0) | 0 (0) |
| Princess Street Nos. 7-19 (odd) | 49 | 49 (33) | 0 (11) | 0 (5) | 0 (0) |
| Oswin Street Nos. 1, 3-5 (inclusive) and 7-41 (odd) | 325 | 15 (14) | 27 (28) | 100 (97) | 183 (186) |
| Hayles Building Nos. 1-84 | 300 | 39 (37) | 46 (37) | 29 (39) | 186 (187) |
| Metro Central Heights Nos 1-413 | 1109 | 970 (781) | 72 (112) | 28 (122) | 39 (94) |
| Dante Road Nos. 6-10 (even) | 90 | 90 (14) | 0 (10) | 0 (14) | 0 (52) |
| Walworth Road Nos. 80-92 (even) | 113 | 111 (34) | 0 (2) | 2 (2) | 0 (75) |
| Arch Street Nos. 26 and 28 | 172 | 102 (96) | 54 (36) | 3 (22) | 13 (18) |
| Tribeca Square West Tower | 551 | 470 (414) | 34 (71) | 47 (66) | 0 (0) |
| Tribeca Square South Tower | 251 | 173 (14) | 56 (81) | 7 (34) | 15 (22) |
| Total | 6220 | 4751 (3984) | 519 (705) | 384 | 566 (843) |

| | | | | | |
|--|--|--|--|-------|--|
| | | | | (688) | |
|--|--|--|--|-------|--|

Existing baseline V. Proposed Daylight Distribution and cumulative ()

| Property | No. of rooms tested | No. retaining at least 80% of their baseline NSL value | No. with minor adverse impact of up to 30% reduction in NSL | No. with moderate adverse impact of between 30%-40% reduction in NSL | No. with substantial adverse impact of over 40% reduction in NSL |
|--|---------------------|--|---|--|--|
| Cheam House | 22 | 22 (22) | 0 (0) | 0 (0) | 0 (0) |
| 2 Dante Road | 16 | 16 (16) | 0 (0) | 0 (0) | 0 (0) |
| Perronet House | 192 | 188 (186) | 1 (0) | 0 (1) | 3 (5) |
| Brook Drive Nos. 171-193 (odd) | 50 | 48 (48) | 1 (1) | 0 | 1 (1) |
| Wardroper House | 15 | 15 (15) | 0 (0) | 0 (0) | 0 (0) |
| One the Elephant | 584 | 551 (535) | 18 (27) | 10 (9) | 5 (13) |
| Metro Central Heights (Public House) | 39 | 27 (26) | 1 (0) | 7 (9) | 4 (4) |
| Alexander Fleming House | 114 | 110 (107) | 2 (4) | 0 (0) | 2 (3) |
| Strata | 639 | 616 (609) | 9 (12) | 11 (13) | 3 (5) |
| Draper House | 381 | 381 (356) | 0 (18) | 0 (5) | 0 (2) |
| Elliott's Row Nos. 30-56 (inclusive), 58 and 61-68 (inclusive) | 131 | 126 (126) | 2 (2) | 3 (3) | 0 (0) |
| St Georges Road Nos. 21, 35 and 58-60 (even) | 49 | 46 (47) | 3 (2) | 0 (0) | 0 (0) |
| Gaywood Street Nos. 27-35 (odd) | 25 | 25 (25) | 0 (0) | 0 (0) | 0 (0) |
| Princess Street Nos. 7-19 (odd) | 35 | 35 (23) | 0 (6) | 0 (5) | 0 (1) |
| Oswin Street Nos. 1, 3-5 (inclusive) and 7-41 (odd) | 139 | 14 (14) | 16 (16) | 30 (30) | 79 (79) |
| Hayles Building Nos. 1-84 | 271 | 170 (166) | 45 (45) | 33 (32) | 23 (25) |
| Metro Central Heights Nos 1-413 | 492 | 473 (467) | 3 (6) | 1 (4) | 15 (15) |
| Dante Road Nos. 6-10 (even) | 86 | 86 (12) | 0 (10) | 0 (7) | 0 (57) |
| Walworth Road Nos. 80-92 (even) | 57 | 57 (33) | 0 (0) | 0 (3) | 0 (21) |
| Arch Street Nos. 26 and 28 | 123 | 116 (106) | 3 (11) | 1 (2) | 3 (4) |
| Tribeca Square West Tower | 449 | 375 (375) | 22 (22) | 23 (22) | 29 (30) |
| Tribeca Square South Tower | 183 | 170 (167) | 12 (14) | 1 (1) | 0 (1) |
| Total | 4092 | 3667 | 138 | 120 | 167 |

Perronet House

482. This building is situated directly to the north and west of the proposed development and has principal room windows facing onto the Peninsula. As can be seen from the tables above there will be a considerable number of windows that would see a reduction in VSC, nonetheless, 237 (88%) of the 270 assessed windows would continue to meet the BRE guidelines.

483. The remaining 33 windows would lose more than 20% VSC with 12 experiencing a 20% - 30% reduction and 11 windows experiencing a 30-40% reduction. A total of 10 windows would experience a loss of VSC in excess of 40%. Whilst not all of the room uses have been confirmed, it is worth noting that 19 of the affected windows serve rooms in which there are additional windows which would continue to receive BRE compliant VSC levels. It is noted that there is a window that would experience a 100% loss in VSC, however this window has a very low VSC to begin with at 0.3% because it sits beneath a very deep overhang. The remaining losses are also from low existing VSC levels. As such the small real terms reduction in VSC generates a disproportionate percentage figure.
484. In terms of NSL, 188 (98%) of the 192 assessed rooms would satisfy the BRE criteria. One room would experience a 20% - 30% reduction whilst three would experience reductions in excess of 40%. The most affected rooms are at ground floor and whilst the room uses have not been confirmed, it is noted that the level of NSL loss is attributable to the urbanised location. Whilst it is acknowledged that there would be some significant impacts to the dwellings at Perronet House on VSC, the overall impact in terms of daylight taking into account the positive NSL results at 98% compliance is considered to be acceptable on balance, within this central London location.

Brook Drive

485. Brook Drive lies immediately to the west of the proposed development, running perpendicular to Newington Butts. The daylight and sunlight assessment has considered properties 171-193 Brook Drive (odd). A total of 82 windows across 50 rooms have been assessed on this street. In terms of VSC, 77 windows (94%) would be compliant with the BRE guidance. Three windows would have reductions of 20%-30%, however these windows serve rooms which also benefit from unaffected windows and as such there would be no significant impact. Two windows would have reductions of between 30%-40%, however these windows serve a bedroom which is less sensitive to daylight reductions than principal living accommodation and as such the impact is considered to be minor.
486. Of the 50 rooms assessed for NSL 48 (96%) would retain BRE compliant daylight distribution. One room would have a reduction of 20%-30% and one a reduction in excess of 40%. Overall the impact on the properties on Brook Drive is considered to be minor.

One the Elephant

487. The recently completed residential tower at One the Elephant sits immediately on Newington Butts, to the south of proposed plots W2 and W3 and to the west of plots E2 and E3. 923 windows have been assessed for VSC, with 72% of windows (669) retaining at least 80% of their previous value and as such complying with the BRE guidance. 132 windows would have minor reductions of between 20%-30% VSC, 70 would have moderate reductions of 30%-40% loss and 52 windows would have substantial adverse reductions of more than 40% loss of VSC. The majority of the affected windows are located at lower levels on the north and east facades.
488. In terms of NSL, 551 of the 584 rooms that were assessed would meet the requirements of the BRE guidelines. This equates to 94% of all rooms which is considered to balance out the impact upon VSC.

Metro Central Heights (Public House)

489. This particular block of the Metro Central Heights complex sits to the north of the site immediately adjacent to the gyratory and New Kent Road, and opposite proposed plots E1 and E2. 65 windows were assessed serving 39 rooms, of which 31 windows (48%) would comply with the BRE guidance on VSC and 27 rooms (69%) would comply with the criteria regarding daylight distribution.
490. 23 windows would experience a moderate loss of VSC of between 30%-40% and 11 would record a substantial adverse impact of more than a 40% reduction in VSC. Generally, those rooms that would experience a greater than 40% reduction in VSC already have low existing VSC levels and as such the real terms reduction in VSC is not as significant as the percentage figure would allude to. Notwithstanding this, it is considered that there would be a moderate adverse impact upon this block, with some windows and rooms experiencing substantial reductions.

Alexander Fleming House

491. This is the address given in the applicant's daylight and sunlight report but it is incorrect. The building actually forms part of and is a later addition to the Metro Central Heights complex and sits immediately to the west of the railway viaduct. It would be opposite the proposed LCC building and this would result in only a 47% compliance level in terms of VSC (73 out of 154 windows). Whilst this would be a moderate to substantial adverse impact, the VSC results should be considered against the positive daylight distribution levels that would ensure good levels of sky visibility in what is a dense urban environment, with 110 of the 114 rooms assessed for NSL complying with the BRE guidance which equates to a 96% compliance rate.

Strata

492. Strata sits close to the southern gyratory on Walworth Road and lies to the south of the proposed development, facing directly onto proposed block E3. 761 windows and 639 rooms were assessed for VSC and NSL respectively. In terms of VSC, 652 windows would comply with the BRE criteria, equating to 86% of all assessed windows. The remaining 109 windows would experience a 20%-30% reduction (33 windows) and a 30%-40% reduction (37 windows). A total of 39 windows would experience reductions in excess of 40%. Whilst this would indicate a minor to moderate adverse impact in terms of the criteria set out in the ES, it should be noted that 96% of rooms, 616 of the 639 assessed for NSL, would continue to have BRE compliant daylight distribution which is positive.

Draper House

493. Draper House lies to the south of the proposed development on Newington Butts. The impact on this building would be very minor, with 571 of the 574 windows assessed against the VSC criteria complying with the BRE guidance, equating to a 99% compliance rate. It should also be noted that all 380 rooms assessed for daylight distribution would meet the BRE criteria for NSL.

Elliott's Row

494. Elliott's Row lies to the west of the proposed development and would be most directly affected by proposed plot W3 (mansion block). The daylight and sunlight assessment

has considered the impact of the development on numbers 30-56 (inclusive), 58 and 61-68 (inclusive). Overall there would be a very high level of compliance with the BRE in terms of VSC, with 263 of the 267 assessed windows retaining BRE compliant VSC which equates to a 98% compliance rate. Additionally, 126 of the 131 rooms assessed for daylight distribution would retain BRE compliant NSL, equating to a 96% compliance rate which is positive. The impact on the dwellings on Elliott's Row is considered to be minor.

St George's Road

495. The properties at numbers 21, 35 and 61-68 (inclusive) St Georges Road have been assessed. St George's Road sites to the north-west of the proposed development and 66 windows across 49 rooms have been assessed for VSC and NSL respectively. Compliance rates for both criteria would be high at 92% for VSC and 94% for NSL indicating that the impact on these dwellings would be minor in significance.

Oswin Street

496. Oswin Street lies immediately to the west of the proposed development and would face onto plot W3. Numbers 1, 3-5 (inclusive) and 7-41 (odd) have been assessed comprising 325 windows for VSC and 139 rooms for NSL.
497. The impact on these properties would be significant, with only 15 (5%) of the assessed windows retaining BRE compliant levels of VSC. A total of 27 windows would experience a loss of between 20%-30% and there would be 100 windows with losses ranging from 30%-40%. There would be a total of 183 windows with reductions in VSC in excess of 40% and this is broken down further as detailed below:

| Reduction | No. of windows affected |
|------------------|--------------------------------|
| 40% - 50% | 68 |
| 50% - 60% | 62 |
| 60% - 70% | 52 |
| 70% - 80% | 1 |
| 80% - 90% | 0 |
| >90% | 0 |

498. Whilst not all of the room uses have been confirmed, it is worth noting that 78 of the windows which would experience a loss of VSC in excess of 40% serve 46 rooms which have an additional windows which would experience a more moderate loss of VSC of below 40%.
499. The impact upon NSL would equally significant, with 14 (11%) of the 139 assessed rooms complying with the BRE criteria. The remaining 125 rooms would experience losses of between 20%-30% (16 rooms) and 30%-40% (30 rooms). A total of 79 rooms would record losses in excess of 40% NSL.

Hayles Building

500. Numbers 1-84 Hayles Buildings are immediately to the west of the proposed development, behind the properties on Oswin Street. These properties would be most affected by the development of proposed plot W3. A total of 300 windows and 271 rooms have been assessed for VSC and NSL respectively. With regards to VSC, 39 windows would continue to receive BRE compliant daylight levels, equating to 13%.

Losses of 20%-30% would be recorded at 46 windows, and 29 windows would experience a loss of between 30% and 40%. 186 windows would be subject to losses exceeding 40% VSC and this is broken down further in the table below:

| Reduction | No. of windows affected |
|-----------|-------------------------|
| 40% - 50% | 21 |
| 50% - 60% | 57 |
| 60% - 70% | 30 |
| 70% - 80% | 38 |
| 80% - 90% | 18 |
| >90% | 22 |

501. It should be noted that there are 19 windows which would experience a 100% loss of VSC, although these windows already have very low existing VSC levels (1.6 – 0.1 VSC) and as such the actual real terms loss in VSC would be minor. This would also generally be the case for the majority of units that would experience in excess of a 40% reduction in VSC in that they already have very low existing VSC levels and whilst the percentage reduction may seem excessive, the actual real terms VSC reduction would be less significant.
502. The impact upon NSL would be more positive, with 170 of the 271 assessed rooms retaining BRE compliant daylight distribution, equating to 63% of the assessed rooms. The remaining 101 rooms would experience losses of between 20%-30% (45 rooms) and 30%-40% (33 rooms). A total of 23 rooms would record losses in excess of 40% NSL.

Metro Central Heights (Former Alexander Fleming House)

503. This is located on the northern side of New Kent Road and occupies a large site. It would be most directly affected by proposed blocks E1 and E2.
504. 1,109 windows across 492 rooms have been assessed against the VSC and NSL criteria respectively. In terms of VSC, 970 rooms would continue to meet the BRE guidance working out at an 87% compliance rate. Whilst it is acknowledged that there would be 39 windows recording a loss of VSC in excess of 40%, this should be looked at in conjunction with the positive daylight distribution results which show that 473 of the 492 rooms would continue to meet the BRE guidance. The NSL compliance rate is 96% which is considered positive and indicates that the impact on the buildings at Metro Central heights would be minor in the context of the proposed development and the criteria set out in the ES.

Walworth Road

505. Numbers 80-92 Walworth Road (even) lie to the south of the proposed development. The impact upon this building would be very minor, with 111 of the 113 windows assessed against the VSC criteria complying with the BRE guidance, equating to a 98% compliance rate. It should also be noted that all 57 rooms assessed for daylight distribution would meet the BRE criteria for NSL.

Arch Street

506. The dwellings at 26 and 28 Arch Street lie to the north/north east of the proposed development on the other side of the railway viaduct on New Kent Road. These

buildings would be close to the larger components of the proposed development which would result in only a 59% compliance rate in terms of VSC (102 out of 172 windows). Whilst this would be a moderate to substantial adverse impact, the VSC results should be considered against the positive daylight distribution levels which would ensure good levels of sky visibility in what is a dense urban environment; 116 of the 123 rooms assessed for NSL would comply with the BRE guidance for NSL and this equates to a 94% compliance rate.

Tribeca Square West (Elephant One)

507. This is part of a new development that lies to the east of the site and is bound by Elephant Road and New Kent Road. 85% of the assessed windows would continue to meet the BRE guidelines for VSC and 83% of the rooms would meet BRE criteria for NSL. Whilst 34 of the assessed windows would record losses of between 20%-30%, this is considered to be a minor impact in the context of the ES. It should also be noted that the remaining 47 windows would experience losses of between 30%-40% and whilst this could be considered a moderate adverse impact, it is considered that they would retain a reasonable level of daylight given the highly urbanised location.

Tribeca Square South (Elephant One)

508. This is part of the same development as Tribeca Square West outlined above. 69% of the assessed windows would continue to meet the BRE guidelines for VSC. However, the daylight distribution results would be more positive, with 93% of the assessed rooms meeting BRE criteria for NSL indicating that the overall impact on this block would be minor adverse.

Metropolitan Tabernacle

509. The initial daylight and sunlight assessment omitted the residential accommodation to the rear of the Metropolitan Tabernacle; an addendum has therefore been submitted assessing the impact of the proposal on this dwelling. Whilst there would be a reduction in VSC of between 20%-30% in five of the six assessed windows, all of the rooms would see a marked improvement in their daylight distribution as a result of the proposed development. The impact on this dwelling is therefore considered to be minor.

Cumulative impacts

510. The cumulative impacts on all properties in terms of VSC and NSL are set out in the tables above and the applicant has considered these impacts as part of the Environmental Statement. The cumulative assessment results in an additional 945 windows, out of 6220 assessed windows, falling short of the BRE criteria. Overall the compliance rate on VSC and NSL in the cumulative scenario would be 64% and 85% respectively balanced against a compliance rate of 76% (VSC) and 90% (NSL) when considering the impact of the proposed scheme in isolation. Whilst impacts of both moderate and substantial harm have been identified in the cumulative scenario, these are largely attributable to the combination of various developments taking place in the surrounding area as opposed to the proposed development itself.

Skipton House

511. In 2016 the Council resolved to grant planning permission for a large mixed-use development on the site of Skipton House which is beyond the northern roundabout,

behind the entrance to the Bakerloo Line station.

512. The Skipton House scheme has been included in the daylight and sunlight assessment as part of the massing of the cumulative schemes and their potential impact on the daylight and sunlight of surrounding dwellings. In terms of the impact of the proposed development on Skipton House, it should be noted that the dwellings which this development would contain have not been included in the overall assessment. This is largely a consequence of the distance of the proposed residential blocks in the Skipton House scheme from the proposed development site. Additionally, the residential part of the Skipton House development would sit behind a commercial element until level 14, at which point the residential units would have good access to daylight and sunlight. As such, it is not considered necessary to assess the VSC and NSL impacts of the proposed scheme on the Skipton House proposal.

Sunlight

513. In considering the impact upon sunlight to residential properties, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. The BRE guidelines advise that a window should receive a minimum of 25% of the annual probable sunlight hours, of which 5% should be received during winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than 20% of its former value.

| Property | No. of window s | BRE compliant | Non-Compliant | | | | | |
|--|--------------------|------------------|--------------------|--------------------|--------------|--------------------|--------------------|--------------|
| | | | Winter APSH | | | Total APSH | | |
| | | | 20- 30% Loss | 30- 40% Loss | >40% Loss | 20- 30% Loss | 30- 40% Loss | >40% Loss |
| Perronet House | 158 | 144 | 0 | 0 | 11 | 1 | 2 | 4 |
| Brook Drive Nos. 171-177 (odd), 183, 189, 193. | 45 | 45 | 0 | 0 | 0 | 0 | 0 | 0 |
| Wardroper House | 15 | 15 | 0 | 0 | 0 | 0 | 0 | 0 |
| One the Elephant | 540 | 537 | 0 | 0 | 0 | 3 | 0 | 0 |
| Metro Central Heights (Public House) | 61 | 52 | 0 | 0 | 6 | 0 | 1 | 6 |
| Alexander Fleming House | 154 | 93 | 0 | 0 | 61 | 5 | 8 | 25 |
| Strata | 87 | 87 | 0 | 0 | 0 | 0 | 0 | 0 |
| Draper House | 294 | 294 | 0 | 0 | 0 | 0 | 0 | 0 |

| | | | | | | | | |
|---|-----|-----|---|----|-----|----|----|-----|
| Elliott's Row Nos. 30-56 (inclusive) , 58 and 61-68 (inclusive) | 263 | 263 | 0 | 0 | 0 | 0 | 0 | 0 |
| St Georges Road Nos. 35 and 58-60 (even) | 43 | 43 | 0 | 0 | 0 | 0 | 0 | 0 |
| Gaywood Street Nos. 27- 35 (odd) | 37 | 37 | 0 | 0 | 0 | 0 | 0 | 0 |
| Princess Street Nos.7-19 (odd) | 49 | 49 | 0 | 0 | 0 | 0 | 0 | 0 |
| Oswin Street Nos.1, 3-5 (inclusive) and 7-41 (odd) | 325 | 170 | 4 | 19 | 52 | 28 | 39 | 171 |
| Hayles Building Nos. 1-84 | 296 | 184 | 4 | 6 | 56 | 4 | 11 | 97 |
| Metro Central Heights Nos. 1- 413 | 998 | 858 | 0 | 0 | 134 | 27 | 21 | 9 |
| Dante Road Nos. 6-8 (even) | 8 | 8 | 0 | 0 | 0 | 0 | 0 | 0 |
| Walworth Road Nos. 84, 88, 92 | 20 | 20 | 0 | 0 | 0 | 0 | 0 | 0 |
| Arch Street Nos. 26 and 28 | 77 | 70 | 0 | 1 | 5 | 0 | 0 | 1 |
| Tribeca Square West Tower | 161 | 161 | 0 | 0 | 0 | 0 | 0 | 0 |
| Tribeca Square South Tower | 97 | 84 | 0 | 12 | 0 | 1 | 4 | 1 |

| | | | | | | | | |
|-------|------|------|---|----|-----|----|----|-----|
| Total | 3728 | 3128 | 8 | 38 | 325 | 69 | 89 | 315 |
|-------|------|------|---|----|-----|----|----|-----|

514. The properties at Hayles Buildings and the dwellings on Oswin Street would experience a substantial adverse impact in relation to sunlight, whilst Alexander Fleming House and Metro Central Heights (1-413) would experience a moderate adverse impact. All of the remaining properties surveyed would have a minor adverse impact in terms of sunlight. Those buildings experiencing a substantial adverse impact have been considered in more detail below:

Hayles Buildings

515. A total of 97 windows would experience a reduction in sunlight in excess of 40%, with 56 windows having at least a 40% reduction in winter sun. This is acknowledged as a substantial adverse impact, however it is the case that many of these windows already have low sunlight values which has resulted in a disproportionate percentage reduction in comparison to the real terms reduction in sunlight.

Oswin Street

516. 171 of the assessed windows would experience a reduction in sunlight beyond 40%, with 52 windows having at least a 40% reduction in their winter sun. As with Hayles Buildings, this is considered to be a substantial adverse impact and it results from the eastern orientation of these properties and their location close to plot W3.

Overshadowing

517. The BRE guidance advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21st March. If the area receiving 2 hours sunlight is reduced by more than 20% it is considered that the change may be noticeable. Three existing amenity areas have been assessed:
- Area1: Amenity space located at the end of Elliott's Row on the junction with St Georges Road;
 - Area 2: Courtyard within Metro Central Heights; and
 - Area 3 : Amenity space on the corner of Meadow Row and New Kent Road.
518. The overshadowing assessment demonstrates that these spaces would comply with the BRE guidance. In terms of transient overshadowing within the area there would be a small amount of additional overshadowing caused by the proposed development on March 21st, although this additional overshadowing would not affect the surrounding sensitive amenity areas.
519. Additionally, on June 21st there would be an increase in overshadowing to St Mary's Churchyard to the south-west of the site between 6am and 7am, but for the remainder of the day there would be no increase in overshadowing.
520. In winter there would be an increase in overshadowing on the courtyard within the London South Bank University Technopark building (at lunchtime). For the remainder of the day, the sensitive amenity areas would be unaffected by overshadowing from the proposal and the overall effect of the development on overshadowing would be minor.
521. It should also be noted that impacts upon the rear gardens of the dwellings on Oswin

Street would comply with the BRE guidance in terms of overshadowing. Only one garden on the northern end of the street would experience a reduction in sun on the ground, but this would be less than 20%. Additional studies have been submitted assessing shadow to west square, and there would be no increase in shadow to the garden in the centre of the square, either in the proposed or cumulative conditions.

Conclusions on daylight, sunlight and overshadowing

522. For daylight and sunlight it is noted that there would be significant adverse impacts to the properties at Oswin Street, Hayles Buildings, and to a lesser extent, Metro Central Heights. The proposal would not result in any significant overshadowing effects.
523. The impacts upon daylight and sunlight must be weighed in the balance with the location and planning framework for the site, and the regeneration benefits which this major regeneration scheme would bring forward. The site sits within the Central Area as defined by the Elephant and Castle SPD which recognises the potential for this area to become a fantastic town centre, with a dynamic community and a range of uses as well as becoming an attractive Central London destination. The regeneration of the site would deliver significant increases in retail, residential and education floorspace, new leisure facilities and public transport improvements. As acknowledged by both the London Plan and the Elephant and Castle SPD, opportunity areas are considered to be appropriate for tall buildings, and they are considered to be both key to achieving the vision for Elephant and Castle (including the uplift in floorspace and new homes) and to signalling the regeneration of the area.
524. The adverse impacts on daylight and sunlight identified in the ES are unfortunate, however the proposed development is considered to be in line with the vision for the area and the tall buildings proportionate in scale for an urbanised central London location. In this case, the impacts on the dwellings identified are considered to be acceptable on balance, given the significant benefits which would arise from the redevelopment of the site and the long term regeneration objectives set out in the Elephant and Castle SPD.

Solar glare

525. The BRE guidance advises that glare or solar dazzle can occur when sunlight is reflected from a glazed facade. It advises that this can affect road users outside and the occupants of adjoining buildings, and that the problem can occur either when there are large areas of reflective glass or cladding on the facade, or when there are areas of glass or cladding which slope back so that high altitude sunlight can be reflected along the ground. As such, solar dazzle is only a long term problem for some heavily glazed (or mirror clad) buildings.
526. Chapter 15 of the ES considers the impact of solar glare on road junctions and pedestrian crossings, and this is considered in the transport issues section of this report. The ES does not consider the impact upon adjoining buildings on the basis that the proposed building facades would not be fully, or even heavily glazed and the facades would be vertical as opposed to sloping, and no mirrored glazing is proposed. In light of the above officers are satisfied that it is unlikely that the proposal would cause instances of solar glare into neighbouring buildings. Moreover, there is no guidance on appropriate levels of solar glare that would be considered acceptable, and solar glare assessments focus on *areas* of reflection at viewpoints that are considered the highest safety risks which ultimately are on the nearby roads and train lines as there is potential for solar glare effects to impair the vision of road users and

train drivers. Whilst it is possible for nearby residents to use blinds or avert their gaze from any solar reflections, road users cannot always choose to look away from the glare.

Light pollution

527. The ES advises that because the proposal does not include a large expanse of commercial office space, a light pollution assessment is not considered necessary.
528. The towers within the proposed development would contain residential accommodation, and the tower cores containing the lifts and stairs and which would more than likely be permanently lit, would be located in the centre of the towers. As such any light emanating from the building would be from the individual flats, and it is likely that most of them would be turned off overnight and that people would have blinds and curtains at their windows. There would be external lighting to the buildings and to the public realm and non-residential uses on the lower floors of the development. As such a condition for details is recommended, to ensure that they would not result in any unacceptable light pollution to neighbouring properties.
529. The exception to the above is the proposed LCC building which could result in some light spillage towards Metro Central Heights and new residential accommodation at Elephant One. In light of this a condition is recommended requiring details of any likely light pollution and potential mitigation (if required) to be submitted for approval.

Temporary demolition / construction impacts

530. Concerns have been raised by neighbouring residents regarding demolition and construction impacts, including noise and disturbance, impact upon air quality and construction traffic. The Metropolitan Tabernacle which adjoins the west site has raised concerns that recent works being carried out at the LCC building has affected the use of their multi-media editing suite, concerns about lack of access to their site during construction, and that the developer should be adequately insured to cover any potential vibration impacts to the Tabernacle (insurance is not a material planning consideration and cannot be taken into account).
531. Key principles outlined in the application documents in relation to the management of the demolition and construction process include the need to minimise disturbance to neighbouring residents, businesses and those using the area, to ensure continuity of access to the Northern Line, and to allow for the movement of the LCC from its existing home on the west site to the proposed new building on the east site.
532. Chapter 6 of the ES specifically relates to the development programme, demolition and construction, and includes details of the sequence in which the individual plots would be constructed on the east and west sites. The impacts of demolition and construction are also considered in the relevant chapters of the ES, i.e. demolition and construction impacts upon transport, upon air quality, upon noise and vibration and so on. It is noted that the phasing / sequencing could change, and a condition is recommended requiring a phasing plan to be submitted for approval.
533. A construction management plan (CMP) has also been submitted with the application which sets out how it is intended that the demolition and construction process would be implemented and managed; it is based on a standard proforma which has been produced by the Council to assist people in formulating CMPs. There are a number of concerns regarding the details which have been submitted to date, namely:

- Construction hours need to be agreed;
 - The construction of plot W3 as the last plot on the west site (it is considered that this should be constructed first as the completed building would act as a screen during the construction of plots W1 and W2);
 - Potential noise levels and the need to ensure new residential accommodation coming online on the Heygate Estate is adequately protected.
534. The above issues have been raised with the applicant with a view to establish whether they could be addressed. The ES recommends that a detailed Construction Environmental Management Plan be prepared for each part of the site to mitigate some of the adverse impacts, and these should be secured through a s106 agreement. Maintaining access to neighbouring buildings including the Tabernacle could be secured as part of the CEMP, together with vibration monitoring and measures to reduce noise.

Conclusion on impact upon the amenity of neighbouring occupiers and surrounding area

535. The impacts of the proposed uses, impacts upon privacy, overshadowing, solar glare and light pollution are all considered to comply with the provisions of the development plan and relevant supporting guidance insofar as amenity is concerned. Areas of non-conformity with the development plan comprise daylight and sunlight impacts, particularly to properties in Oswin Street, Hayles Buildings and Metro Central Heights, together with impacts upon Corisca Studios and the Faktory restaurant which would see their external smoking areas reduced in size and lost altogether. There would also be temporary adverse impacts during construction, although these would be reduced through demolition and construction management plans. However, when weighed in the balance with the significant regeneration benefits which would arise from the proposal, it is not considered that these adverse impacts would warrant a refusal of planning permission in instance, and that the benefits would outweigh the localised harm caused.

Noise and vibration

536. Noise and vibration is considered in chapter 9 of the ES, which considers impacts from demolition and construction activities, construction traffic, plant noise and servicing activities.

Demolition and construction

537. The ES predicts that demolition and construction work would increase noise levels and potentially cause vibration within and immediately adjacent to the site. This could have a temporary, short-term impacts upon neighbouring residents, particularly along Oswin Street, the northern part of which is a route proposed for construction vehicles. The ES also considers that some parts of the site could be occupied whilst others are being constructed. It advises that the implementation of noise and vibration control and management measures within a construction management plan would reduce this, such as the use of modern and quiet plant and machinery, the erection of hoardings around the site, setting noise and vibration limits and the use of construction techniques to minimise vibration. A construction management plan has been submitted in support of the application, but it is not sufficiently detailed at this stage and there are concerns regarding the use of Oswin Street by construction vehicles owing to potential noise and disturbance to dwellings along this street. A full

construction management plan for each of the sites should therefore be secured through the s106 agreement. With mitigation in place the ES predicts that the impact of noise arising from construction and demolition activities would be insignificant to local, temporary, adverse and of moderate significance.

538. The ES identifies that vibration could occur during construction activities, which could impact upon the existing underground lines. It concludes that with mitigation measures in place including through a construction environmental management plan, vibration impacts during construction would be insignificant to local, temporary, adverse and of minor significance.
539. Further work has been undertaken to consider how demolishing the existing shopping centre would impact on how noise from Corsica Studios is experienced by neighbouring properties. This is set out in a Corsica Studios and Interim Construction Phase Technical Note. The shopping centre currently acts as a shield and removing it could result in neighbouring properties experiencing greater levels of noise from the venue, even though the noise levels themselves would not have increased. Strata and One the Elephant could potentially be affected in this way, and the technical note recommends that until the east site is completed a temporary acoustic screen should be erected at the rear of Corsica Studios. It advises that depending on the length of the interim construction period, other measures to further reduce break-out noise from Corsica Studios should be considered; a condition to secure this has been included in the draft recommendation.

Completed and operational development

540. The ES considers the impact of plant noise, noise from the various uses within the proposed development, servicing noise and road traffic noise and concludes that all of the impacts would be insignificant.
541. The cinema would need to be adequately sound-proofed so as not to cause any loss of amenity, including to the flats which would be located above it in plot E2. As stated in relation to quality of the proposed accommodation, plant noise from the proposed development and noise from the proposed cultural venue could be limited by way of a condition. This would protect both future occupiers of the proposed development and neighbouring residents from unacceptable levels of noise. Subject to this the ES advises that noise emanating from the proposed cultural venue would be insignificant provided the Council's noise criteria are satisfied.
542. Servicing for the proposed development would largely be contained within the buildings on both parts of the site, and the ES advises that conditions on servicing hours could be imposed. Further details are set out below. The applicant has advised that servicing the shopping centre outside of peak hours would not result in noise issues because the impact upon the proposed residential accommodation has been considered and found to be acceptable, and the neighbouring accommodation would be further away.
543. Traffic noise from the completed development is predicted to be insignificant, which takes into account a reduction in vehicle trips compared with the existing situation owing to the reduction in car parking on the site.
544. Subject to the conditions and s106 obligations referred to above, the impact of the proposed development in terms of noise and vibration is considered to be acceptable.

Conclusion to noise and vibration

545. Subject to s106 obligations and conditions, it is concluded that the proposed development would comply with the development plan in relation to noise and vibration.

Transport

546. Elephant and Castle is a major transport node that accommodates a wide range of travel. The site has a public transport accessibility level (PTAL) of 6B ("excellent"), with access to the Northern and Bakerloo lines from within the east site. Elephant and Castle Railway Station adjoins the shopping centre to the east and can be accessed from Elephant Road or via a bridged access from the raised ground floor of the shopping centre. The railway station offers Thameslink services to north and south London and beyond, and is also used by South Eastern services.
547. The site is largely surrounded by major roads that form part of the Transport for London Road Network (TLRN), sits at the confluence of two tube stations and a rail station, is served by 29 bus routes and numerous designated cycle routes. The addition of a new shopping centre, university headquarters and almost 1,000 new homes, as well as the wider growth underway in the Opportunity Area, combine to present very challenging transport impacts, particularly for construction and servicing vehicle movements. The Transport Assessment anticipates that trip generation via all forms of travel will increase by around 4,000 daily trips on completion and this demands careful management and mitigation. These issues are most acute for the East Site, which, as a result of its boundary with the railway viaduct and the TLRN is effectively an 'island site'. In addition, the proximity to existing residential properties on Oswin Street and the adjacency to the Metropolitan Tabernacle presents significant challenges on their own for the west site, both during demolition/construction and on completion.

Strategic Transport Infrastructure

Elephant and Castle Northern Line Ticket Hall (NLTH)

548. The redevelopment will include the delivery of a new station box, to allow London Underground (LU) to subsequently provide a new replacement ticket hall serving the Northern Line at Elephant and Castle. A Development Agreement between the applicant and Transport for London is being negotiated and this will set out the detailed arrangements for its delivery. The station box will allow for a prominent new entrance and a new below ground ticket hall to be provided by LU. The entrance will front on to the peninsula in Block E1 ("the UAL Building") and from here the new 'Station Route' will extend into the centre of the site. From this new entrance, escalators will descend to a new ticket hall level where further escalators will link to platform level, allowing for the removal of the existing lifts and closure of the current ticket hall, which will in turn allow for redevelopment of that site, once acquired from London Underground. This will increase the operational capacity and efficiency of the station and greatly improve the transition from street to platform level. This represents a significant improvement in strategic transport infrastructure at Elephant and Castle and is a key part of unlocking the growth set out in the Elephant and Castle SPD. The provision of the new ticket hall is strongly supported.
549. The new ticket hall will be delivered in discrete stages and requires considerable coordination between a number of stakeholders. The applicant will directly provide the

below ground 'station box' as an integral part of initial works to the sub-structure and superstructure, before handing over to London Underground to complete the final fit-out. A significant financial contribution will be made from the council's CIL receipts and the strategic transport tariff that was levied on Major Developments in the Elephant and Castle Opportunity Area prior to the introduction of CIL.

- 550. A Development Agreement between TfL and Delancey will address the land transactions, funding, programme and logistics associated with the delivery of the new Ticket Hall. This process has been progressing in tandem with the planning process, but at the time of writing, the Agreement has not been fully agreed. At present, it is understood that there is a funding gap between the projected costs of construction and final fit out and the funding available for the project and this will need to be resolved in order to secure the timely delivery of the new station.
- 551. Details of phasing and responsibilities for works associated with the new Ticket Hall will be set out in detailed s106 Schedules, which will tie in with the Development Agreement. This will include binding obligations on the applicant to deliver 'the station box' and on LU to complete the 'fit-out' within prescribed timescales. The s106 will also make clear that the 'existing' ticket hall will not be demolished or its operation unduly compromised until the new ticket hall is operational.

National Rail station

- 552. The layout of the East Site has been carefully considered to improve the transition between the national rail station, the tube station and the wider town centre, improving the efficiency of this location as a major transport interchange.
- 553. The removal of the existing basement ramp allows for a new ground level access to be created between the shopping centre and the existing ticket hall (from which stairs go to the platforms above). The diagonal 'Station Route' forms an axis running from the peninsula to the heart of the site, providing a very direct link between the rail station and the Bakerloo/Northern line ticket halls and the wider town centre. The footprint of pavilion building at the centre of the East Site (E4) has been chamfered to improve the visibility of the rail station from various approaches. This provides a more coherent and legible layout and a future strategy for signage and passenger information will also be secured via the s106 agreement.
- 554. Given the relatively low projected increases in rail passengers as a result of this development and other improvements to sustainable transport arising from the scheme it is not proposed to seek further significant investment in the National Rail station itself. However, conversations between the applicant and Network Rail are ongoing about the need for changes to the western façade of the arches and the interface between these structures and the shopping centre consequent upon demolition for the scheme. Further details about an appropriate scheme of works will be secured in the legal agreement

Servicing and deliveries

East Site

Background

- 555. The east site is bounded by roads forming part of the 'inner ring road' (Congestion Charge boundary) of the Transport for London Road Network (TLRN) and so is both

busy throughout the day and particularly sensitive to interventions that might affect the efficient operation of the highway. With the future redevelopment of the Shopping Centre in mind, the opportunity for a shared, below ground servicing access was secured via the neighbouring development at Delancey's 50 New Kent Road in 2008 – "Elephant 1" (Application Ref: 08/AP/2403). The basement for the development was constructed with two knock-out panels on the western perimeter of the site that would enable a future connection between the piers of the railway viaduct into the Shopping Centre basement. This approach would remove the need for another ground level connection in close proximity to the roundabout and rail viaduct. Construction details were secured by condition and it was demonstrated that the basement had been adequately designed and the panels had been provided.

556. The feasibility of delivering this shared access route was explored as part of comprehensive pre-application discussions. Initial studies undertaken by the applicant team asserted that although the construction of a tunnel beneath the viaduct was technically feasible, the assumed dimensions between the individual Victorian piers of the railway viaduct meant that the envelope that could be created would not be sufficiently sized for delivery vehicles. The council commissioned Balfour Beatty to carry out an independent review that challenged a number of the assumptions that had been relied upon in reaching this conclusion. The Balfour Beatty investigation concluded that a sufficiently sized tunnel could be engineered by underpinning and reinforcing the viaduct piers, however, the report did concede that the construction would be particularly complicated and require specialist piling and tunnelling machinery as a result of the spatial constraints and risk to the railway infrastructure. This was anticipated to have significant cost implications that would likely compromise the delivery of other aspects of the proposal, such as affordable housing. Numerous other options were presented by the applicant and having considered these, officers reluctantly agreed that a new independent access from New Kent Road could be pursued.
557. As TfL is the Highway Authority for New Kent Road, any changes to the highway will need to be agreed by them and delivered via a s278 agreement. As such, TfL officers have also been closely involved in negotiations.

Servicing via New Kent Road

558. Servicing for the East Site will therefore mainly be accommodated at basement level, with a new two way ramped access created immediately to the west of the railway viaduct. The basement will make provision for servicing, deliveries and refuse collection for the various land uses on this site and as such it includes:
- 4x bays for 10m rigid vehicles;
 - 1x bay for 10m rigid vehicle for UAL;
 - 3x residential waste compactors;
 - 2x retail waste compactors;
 - 1x UAL waste compactor.
559. Initial modelling presented in the Transport Assessment estimated up to 99 servicing vehicles requiring daily access to the basement, so 198 vehicle movements either entering or exiting the basement servicing yard. Of this, 46 trips were associated with the shopping centre, 18 with the residential elements and 35 to UAL. This excludes waste collection, which would add further trips. The management of the servicing yard would be predicated on a booking system of 20min delivery slots, monitored and enforced by a management company. It was initially assumed that these trips would

be accommodated during the “inter-peak” period between 10am and 4pm. Assuming an even distribution of trips, this could equate to a vehicle entering or exiting the basement every 2 minutes.

560. Relative to the existing situation, this would represent a sizeable increase in the 50 servicing vehicles that are currently estimated to make use of the basement servicing yard on a daily basis. However, this servicing activity is currently compounded by a high number of daily trips associated with the 140 space public car park beneath the shopping centre. These spaces would not be re-provided in the proposed development, the result of which is that the overall number of daily vehicular trips is likely to reduce.
561. Pedestrian surveys, data linked to bus passenger numbers and information on traffic flows presented in the Transport Assessment demonstrate that the roads bounding the site do not experience the typical drop-off in activity outside the morning and evening peaks and that activity remains high during the day. This being the case, despite an anticipated reduction in the overall use of the basement, the combination of bus passengers, pedestrians, cyclists and servicing vehicles present a significant challenge with potential impacts on both the safety of road users and the operation of the highway network. TfL in particular have underlined the need for the existing length of bus cage on the south side of New Kent Road to be maintained and unencumbered by servicing proposals, as well as the potential for queuing traffic to have a harmful impact on the new pedestrian crossing to be delivered to the east of the viaduct. These factors have necessitated a range of design changes and the introduction of a stringent management regime for access to the basement.

Road safety audits

562. A series of road safety audits have been commissioned by the applicant and Transport for London to assess the risks associated with the new access point and identify a range of physical interventions to reduce them. They acknowledge the challenges presented by restricted visibility from the new basement access, including the potential for conflicts/collisions between different road users, and collectively they have resulted in physical changes that include: the relocation of bus cages/stops along New Kent Road and removal of a bus shelter beneath the viaduct; the imposition of a left-in/left-out system and a central median strip to enforce it; and a commitment to a scheme of works to improve the waiting environment and visibility immediately beneath the viaduct. These measures will be secured via the s106 agreement and delivered via a s278 agreement with TfL. As such, TfL will have final approval of the highway layout in consultation with the Council. Though these interventions improve the situation, they do not eliminate the risk or fully mitigate the potential impacts of this access; however a range of mitigation measures has been negotiated so that this risk falls to what are considered acceptable levels. These measures are set out below.

Vehicle movements and hours of access

563. Protracted discussions between the applicant, officers and TfL have taken place with a view to avoiding access during the morning and evening peaks and minimising servicing trips during the busy “inter-peak”, while also acknowledging that the shopping centre, university and residential elements of the scheme each have bespoke servicing requirements that need to be catered for if the development is to operate successfully. Discussions have focussed on:
- The number and type of vehicles requiring basement access;
 - The hours of access;

- Management of this system.

564. The following arrangements are proposed:

Weekdays

- Unrestricted access between 8pm and 6.30am;
- No deliveries during morning and evening peaks and numbers reduced significantly during the “inter peak” between 10am and 3pm - limited to 34 vehicles on a daily basis (68 movements) for the University only;
- An increase for up to 50 vehicles on a maximum of 60 weekdays per year to accommodate exhibitions and end of year shows (an essential part of the University operation). Additional traffic management will be required on these days;
- Vehicle sizes at these times will be limited to 7.5T;
- Access will be granted for emergency maintenance of specialist university equipment.

Weekends

- Unrestricted access between midnight and 1pm and between 5pm and midnight;
- Limited access between 1pm and 5pm for vehicles below 7.5 tonnes to all land uses up to a maximum of 30 vehicles (60 movements)
- No restrictions on Sundays.

565. This represents a significant shift relative to the servicing arrangements that were presented on submission on the application. The reduction in vehicle movements during the hours where there is the greatest activity along New Kent Road reduces the risk of conflict between different road users and reduces the risk of obstruction and delay to the free flow of traffic around the peninsula. It also means that the basement has ample capacity to accommodate the servicing demands of the development, because the anticipated servicing trips can now be spread over a much longer period than was intended in the initial design. Tracking diagrams have been provided to demonstrate that the layout and size of the servicing yard is adequate to allow safe and convenient manoeuvring for the largest anticipated vehicles.

566. This arrangement represents a compromise that provides the necessary flexibility for the University in particular, who, given their focus of arts, film and photography, have stressed that daytime deliveries are essential to allow for the transfer of materials and equipment that are fundamental to the successful operation of the university. Though retail and leisure operators can more readily accommodate off-peak servicing, the additional flexibility at weekends within a defined capped number of trips is of commercial benefit.

567. The concessions agreed are such that officers and Transport for London are satisfied that this servicing regime is acceptable. However, it is undoubtedly management intensive and will require a robust monitoring and enforcement regime if it is to work.

568. The above conditions will be enshrined in a detailed Delivery and Servicing Management Plan (DSP), as well as being reflected in future lease agreements for residential and commercial occupiers. The DSP will also need to highlight ways in which the anticipated number of trips can be minimised further, whether through efficiencies in the supply chain or the use of on/off-site consolidation, for example. The DSP will need to establish a clear system of monitoring, feedback and review over the

initial years of operation of the shopping centre. These arrangements, including enforcement, will be clearly detailed in the relevant s106 obligations. Further, the detailed design of the basement ramp access will be conditioned so that consideration can be given to the positioning of barriers and monitoring systems that will control access.

- 569. This arrangement does create a tension for daytime residential deliveries, particularly those from online retailers who offer more immediate delivery. Though it is anticipated that tenancy agreements will set out the limitations described above, the provision of a dedicated parcel 'drop off' facility on or in close proximity to the site is a necessary facility if adverse highway impacts are to be avoided. The applicant has committed to this provision either on or in close proximity to the site, potentially at the Elephant One development or an alternative location which is equally as accessible to residents of the scheme. This location will need to be confirmed in a Delivery and Servicing Management Plan prior to occupation of the residential units.
- 570. In addition, 3x disabled parking bays for existing members of staff at UAL will be provided to reflect the provision that they currently enjoy at the LCC site.
- 571. The removal of the residential car parking on the east site means that there is the potential for additional space to be dedicated to servicing and deliveries if warranted by further investigation and/or for storage or other purposes by UAL or other occupiers.

West Site

- 572. Servicing and deliveries for the west site will be split between a central servicing yard located at grade beneath the main residential towers and dedicated provision on Oswin Street. With the University relocating to the East Site, trip generation associated with servicing vehicles on this half of the site is actually projected to decrease from around 31 (62 movements) to 20 (40 movements) daily servicing vehicles.
- 573. The central servicing yard will be accessed via the southern end of Pastor Street, meaning that vehicles can approach either from Brook Drive or Oswin Street. Although this means that servicing vehicles are directed down smaller residential streets, this is tempered by the relatively low number and size of servicing vehicles and is considered the most pragmatic option given the potential impacts on the TLRN and the layout and public realm within the scheme. A direct access from the site to St Georges Road or Elephant and Castle would have introduced similar risks of conflict with pedestrians, buses and cyclists as have been discussed for the east site. Access to the basement car park is located at the northern end of Oswin Street and achieving a clear separation between this area and the servicing yard is considered a sensible and practical response.
- 574. The central servicing yard primarily caters for the two residential towers and the new music venue and will contain 3x loading bays, each containing a single compactor and each accommodating a single 10m rigid delivery vehicle or two smaller vans at any one time. The same management regime as proposed for the East Site is intended, with bookable 20min slots. Over a 6 hour window between the morning and evening peaks (10am to 4pm), this equates to between 54 and 108 delivery slots. The trip generation figures presented suggest that the servicing yard has ample capacity and swept path analysis demonstrates that there is sufficient manoeuvring space to accommodate vehicle movements. These figures do exclude refuse collection and trips associated with the disabled car parking contained at basement level (though no

access to the private car park is provided via the servicing yard). These issues are assessed below.

575. On Oswin Street, it is proposed that 4x dedicated servicing bays are provided on the eastern side of the carriageway to accommodate deliveries and refuse collection for the residential units and office floorspace located within the Mansion Block (W3). Officers have raised concern that such a deliberately engineered solution will create a lot of wasted kerbside space outside of their use for deliveries or waste collection. Instead, it has been requested that the carriageway be widened to improve vehicular movement and that deliveries simply take place from the kerbside. A planning condition is proposed that will allow for a design to be developed, though the fine detail will be confirmed through the s278 Highways approval process.
576. As with the east site, a Delivery and Servicing Management Plan will be required that reflects the specified hours of access, demonstrates attempts to minimise servicing trips insofar as possible and establishes a robust, credible management and monitoring regime. This will be secured by via the s106 agreement.

Waste Management

577. The waste management strategy has been estimated through a combination of referencing the council's guidelines for general and recycling waste for residential units, an assessment of anticipated waste arisings for commercial space based on the land uses proposed and consideration of the existing waste requirements for UAL.
578. For the residential towers, a central waste chute will be provided that can be accessed from each floor. Residents will select whether they are depositing general or recycling waste and this will dictate which bin it is directed to. The applicant asserts that this system operates successfully in other high density residential schemes in London. The system includes a number of safeguards to ensure that if works effectively; the hopper on each floor is much smaller than the size of the chute to avoid the potential for blockages; the system will only operate on one floor at any one time; and when staff are rotating the bins at the base, the hoppers will not be operational at each floor. Commercial users (and UAL) will have access to dedicated bin stores in each of the servicing yards. Each building will make use of compactors to further reduce the volume of waste and, therefore, the required number of collections.
579. The exception to this system is the Mansion Block on the west site, which will instead contain 3x communal bin stores for each of the residential sections and 2x commercial bin stores. These will be collected from the kerbside on Oswin Street, whereas all other collection will occur within the service yards. Swept path analysis has been provided to demonstrate that servicing yards and kerbside spaces are all adequate for manoeuvring collection vehicles.
580. The vast majority of residents are within the recommended 30m between their properties and the waste chute/or bin store in the case of the Mansion Block on the west site.
581. The strategy is space efficient but very management intensive and will require considerable involvement of site based facilities management teams if it is to function effectively. FM staff will transfer waste to compactors located within the servicing yards of both sites where they will be ready for collection – twice a week in the case of residential units and daily in the case of commercial operators.

582. The approach follows the recommendations of the council's waste management team and is broadly supported.

Construction Management

583. An outline construction management plan (CMP) has been submitted that anticipates the overall programme and phasing of demolition/construction and the nature/intensity of construction related activities at different stages over a projected 10 year period. The CMP highlights that progress on the East Site and West Site will occur independently, with a clear gap between completion of the East Site and commencement of enabling works on the West.
584. The CMP anticipates up to 6 separate access points for the East Site and 3 for the West Site, the majority of which will be operating in tandem when construction is underway on the respective sites. The use of the existing basement ramp from Elephant Road prioritised initially for demolition and the construction of the new sub-structure, which is supported given that this allows for access on to Elephant Road rather than directly on to the Elephant and Castle peninsula.
585. Trip generation has been projected for different types of construction vehicle on a quarterly basis for the entire programme. At its peak, the CMP estimates an average of 150 vehicles per day arriving at the East Site across a 6 month period, though between 80 and 100 vehicles per day are anticipated for the majority of the programme.
586. TfL have provided a range of detailed comments on the potential impacts on the highway network during demolition and construction, including on the specific challenges presented by each of the principal construction access points around the site. Each access will need to be carefully managed through a combination of banksmen, physical barriers and limitations of their hours of use to avoid morning and evening peaks. The precise location of the hoarding line will also need to be determined to ensure that bus stops and pedestrian footways can continue to function efficiently and safely. On the West Site, vehicular access points are focused to the north of the site adjacent to St Georges Road, which is beneficial from both a highways perspective and in limiting the amount of construction traffic accessing residential streets to the west of the peninsula- particularly Oswin Street.
587. At present, the draft document assumes the imposition of the council's standard construction hours that would apply on weekdays and Saturday mornings. However, the highways challenges detailed above and proximity to the railway viaduct will necessitate a much more detailed assessment of issues including the timings of vehicular arrivals to the site and particular demolition/construction related activities.
588. The submitted CMP focuses heavily of highways impacts as opposed to environmental mitigation to address potential contamination, noise, vibration and/or air quality impacts - though these issues are recognised and addressed as part of the Environmental Impact Assessment. Notwithstanding the legislative provisions that exist under the Control of Pollution Act 1974 (as amended), specific measures will need to be incorporated into more detailed CMPs to ensure that potential impacts on nearby residents and the town centre more generally are adequately addressed. Robust monitoring will be required for the duration of the demolition and construction programme.
589. Given the intensity and duration of construction activity, the applicant has underlined a

commitment to adhere to a range of best practices schemes that focus on site safety, environmental mitigation and close liaison with affected residents, including the Considerate Constructors Scheme, FORS, CLOCS & WRRR. A specific commitment is made to hiring a Community Liaison Officer to act as a focal point for all resident/business and other interested parties that might have enquiries during the development programme.

590. A range of temporary highways works will be required to facilitate, or mitigate, construction activities. Such measures include the construction of reinforced crossovers and potentially the relocation of existing transport infrastructure such as bus stops and/or cycle parking. The scope of works will be set out in the s106 agreement, specific interventions set out in the CEMPs for the individual phases and their timely delivery secured via a s278 agreement.
591. At this stage, the CMP represents an informed but largely indicative management plan that adequately models the intensity of construction related activities and the potential highway impacts. Though it establishes some key principles. However, further detail on site layout and clear commitments to site management and monitoring regimes will be required for the individual phases once contractors are appointed. This point is acknowledged by the applicant and has been emphasised by officers in highways, environmental protection and by Transport for London through consultation. Further detailed demolition and construction management plans will need to be secured for both the East Site and the West Site via the s106 agreement.
592. Given the proximity of demolition/construction activities to existing infrastructure, TfL highlight that close co-ordination will be required with Network Rail and London Underground. It will be stipulated in the s106 that the complexity of construction and logistics necessitates regular, structured liaison with a range of stakeholders – indeed the submitted CMP commits to this – though separate asset protection agreements should be pursued outside of the statutory planning process, where necessary.

Cycle parking

593. The council's core strategy underlines a commitment to sustainable travel and London Plan Policy 6.9 establishes minimum cycle parking standards for various use classes. The proposal includes a substantial investment in cycling infrastructure within the buildings and the public realm amounting to 1,988 long-stay and 285 short-stay cycle parking spaces.
594. Residential cycle parking numbers meet those specified in the London Plan (776 for the East Site and 850 for the West Site) and all parking will be located within secure stores, principally within the basements of each site. Understandably, cycle storage is divided between numerous storage areas accessed directly via lifts in the various building cores, ensuring that it is convenient for residents. Ancillary spaces for cycle maintenance are also provided on each site.
595. Cycle parking for the university is based on the known number of staff and students and amounts to 291 long stay spaces, while those allocated to the cultural venue (7 spaces), retail (20 spaces) and leisure space (4 spaces) based on a combination of floor space or assumed capacity, as per the requirements of the London Plan. Provision is also made for showering and changing facilities close to the university and retail cycle parking areas.
596. Cycle parking will make use of a range of types of storage and though the precise split

will be confirmed prior to occupation, it will conform to the following principles:

| | | Double Stacker | Upright | Sheffield (Horizontal) | Extra Large | Folding |
|----------------------|--------------------|-------------------|---------|---------------------------|-----------------|---------|
| LONG STAY | Residential | <80% | <5% | >15% | >1 per store | - |
| | Commercial | <80% | <5% | >15% | >1 per store | - |
| | UAL | <90% | <5% | >5% | >1 per store | 5% |

597. All short stay parking for visitors will be provided within the public realm in the form of Sheffield stands or similar horizontal storage. In addition to a large dedicated external cycle parking area for UAL students located between the new university building and the viaduct, it is anticipated that a series of smaller cycle parking areas will be located around the periphery of the site, including at the top of Walworth Road, on the Peninsula and along St Georges Circus. Provision meets the London Plan standards with the exception of leisure (cinema) space. This is provided at 50% of the London Plan standard on the basis that cinema use will often be at evenings and weekends and so visitors can also make use of the short stay spaces allocated to retail and educational uses on the east site. This is considered a practical response that avoids the public realm from being inundated with cycle parking.
598. Locations for short-stay cycle parking have been suggested by the applicant, having considered the relationship with pedestrian movement, bus stops locations and the need to ensure convenient access to the various parts of the development. Final locations will be confirmed as part of the detailed Public Realm design and/or via s278 agreements with the relevant Highways Authorities and the delivery phased to reflect the gradual completion/occupation of the development.

Cycle Hire

599. The scheme will deliver an additional 60 cycle hire docking points, split between 2x new locations: one primarily serving the East Site and one the West. Broad locations have been identified as appropriate by the applicant, but the precise location and timing of delivery will be set out in the s106 agreement.
600. It is anticipated that the existing docking station south of the Shopping Centre on Walworth Road can be retained and remain operational during demolition and construction. However, in the event that more detailed analysis reveals that a temporary suspension is necessary, the s106 agreement will make clear that a replacement facility will need to be installed prior to the removal of this facility. It is anticipated that the alignment of this facility will be changed to reflect the new building line at the south of the shopping centre.
601. As a measure to stimulate use of cycle hire use and contribute to sustainable travel, it is proposed that membership of the cycle hire scheme is secured for each new resident/property for a period of 3 years as part of the 'welcome package'. This will be secured via the s106 agreement.

Car Parking

602. A car free development is proposed with the exception of a limited amount of wheelchair accessible parking. It is not proposed to replace the existing car parks

serving the shopping centre or the London College of Communication. This approach is very much consistent with the sustainable transport policies in the London Plan and Southwark Plan, both of which stress that private parking should be minimised in areas of high public transport accessibility and establish only 'maximum' car parking levels. This approach is also advocated in the Elephant and Castle SPD.

603. Concerns have been raised by a local resident and by the Metropolitan Tabernacle regarding the loss of the existing car parks adjacent to the LCC and beneath the shopping centre. The points raised include the impacts on the operation of the Tabernacle (who currently utilise both car parks), on the removal of a facility that offers convenience for residents who are less mobile and on the loss of income to the council as a result of removing the shopping centre car park, specifically. While these concerns are noted, the Development Plan sets out a very strong policy presumption that sustainable methods of travel be pursued. The retention or re-provision of these car parks would not be consistent with this aim. The local area already benefits from excellent public transport options and the development will deliver substantial improvements in the quality of public realm, makes proper provision for active travel and, will enable improved public transport notably by virtue of facilitating a new ticket hall for the Northern Line. The existing shopping centre car park income goes to the applicant as owner, not the Council.
604. 34x wheelchair accessible parking spaces for residents will be provided in the basement of the western site, with access provided via a ramp at the northern end of Oswin Street. This provides convenient access to St Georges Road and limits the number of vehicles needing to drive down Oswin Street. The basement spans all three residential blocks on the west site and there is convenient access from the parking area to the lift cores serving each of the blocks. All spaces have been sized to meet the access requirements enshrined in Building Regulations, 20% (6 spaces) of these spaces will be active electric vehicle charging points and a further 20% (6 spaces) passive spaces, capable of being activated in future if demand arises. The initial proposal to include 13x accessible spaces in the basement on the east site for residents of the east site has been removed given the above mentioned concerns regarding basement access.
605. This level of parking provision equates to 35% of the total number of wheelchair user dwellings, or 68% of those on the West Site, and this is considered acceptable having regard to the London Plan and Elephant and Castle SPD, which both advise that *adequate* parking for disabled persons should be provided. Emerging New Southwark Plan policy DM49 stipulates a maximum provision of 1 accessible parking space per unit with consideration given to anticipated demand given the tenure of housing; the quality and accessibility of local public transport and car ownership levels. Officers consider that these factors support a lower level of accessible parking provision at this site.
606. In addition to the above residential parking, 3x wheelchair accessible parking spaces are to be located in the basement of the east site for existing UAL staff members. This reflects the existing provision enjoyed by particular members of staff on the LCC site and is considered a reasonable provision. To avoid compromising the detailed servicing regime that is outlined above, automated number plate recognition will be installed at the basement access to allow unencumbered access for this very limited number of vehicles.
607. Further provision is made for the storage/charging of 8x mobility scooters on the mezzanine level of the east site. This storage space will be accessed via lifts in the

residential core rather than via the basement. There is no policy requirement for such provision, but it is considered a reasonable facility given the scale of development proposed.

608. The site is located within a Controlled Parking Zone and as such new residents and commercial occupiers will be prevented from obtaining on-street parking permits in order to avoid parking stress.

Public realm and permeability

609. The redevelopment of the site provides an opportunity to greatly improve the public realm at the heart of Elephant and Castle with a dual focus on quality and connectivity.
610. The block structure of each half of the site has been designed to increase permeability and key desire lines around the peninsula. For the east site, this includes the creation of two key routes: the 'Station Route', which runs from the peninsula to the heart of the East Site and connects the two tube stations to the national rail station; and the 'Park Route', which runs from Elephant and Castle through the railway arches to Elephant Park. At the confluence of these routes is a new central court that could be used as a temporary events space. A further route to the east of the southern block has been opened up to improve direct access into the site from Walworth Road and from the bus stops to the south of the shopping centre. Active frontages have been pursued throughout to animate the public realm and 'back of house' facilities have been minimised or located in less prominent places.
611. These connections – particularly the Park Route – greatly improve the permeability of the site and by improving connections with the wider town centre, fulfil a key ambition of the Elephant and Castle SPD. The delivery of this route through the arches is subject to a commercial agreement between the applicant and Network Rail. Given its importance in improving east-west connections across the site and the Town Centre, a specific planning obligation is included in the s106 agreement that requires its delivery or an alternative.
612. For the west site, the existing servicing access to the LCC and Tabernacle – Pastor Street – is extended towards St Georges Circus and will act as a new hard landscaped shared space, bounded by commercial spaces at ground floor level but also accommodating some servicing access. The public realm here directs movement in a north/south direction, with the Mansion Block (Block W3) reinforcing the residential character of Oswin Street.
613. Surveys undertaken as the proposals emerged identified that pedestrian flows reach around 3,000 pedestrians an hour on Elephant and Castle and just in excess of 2,000 pedestrians an hour on New Kent Road during the peaks and given the quantum of development proposed within this scheme and within the wider Opportunity Area, this is expected to increase. These surveys have influenced the public realm design and underpin a Pedestrian Comfort Level (PCL) assessment, as advocated by TfL.
614. The PCL analysis is effectively an assessment of crowding; it considers the number of people in a given space. The analysis has been used to inform the design of individual routes and pavement widths around both sites. Footways widths have generally increased throughout – with minimums of 5m on the East Site where activity is likely to be greatest and both the Station and Park Routes designed with a 9m width. The information presented demonstrates a significant improvement and that excellent pedestrian comfort levels will be achieved.

615. The quality of these spaces is contingent on a range of more detailed design issues, including landscaping treatments, planting and microclimate, and although these issues have influenced the current public realm proposals, it is recommended that a more detailed public realm strategy is secured in the legal agreement for approval prior to occupation.
616. This strategy – or a bespoke strategy – will also be required to set out details of the approach to signage, including the installation of Legible London signage. This may be undertaken directly by the applicant or via a payment made to TfL to deliver.
617. Despite the detailed design being deferred to a future strategy, it is clear that the development will deliver a more functional, efficient and higher quality public realm that is of great benefit to the wider town centre at Elephant and Castle.

Travel Plan

618. A draft Travel Plan Framework has been prepared and sets out a range of measures that will encourage future residents, employees and visitors to the site to make use of sustainable travel choices. The plan follows TfL guidance, establishing clear objectives, interventions and a monitoring framework to consider whether more sustainable travel has been achieved. It is noted that a work place travel plan is also in place for the UAL.
619. The Travel Plan summarises investment in physical infrastructure to facilitate more sustainable travel as follows:
- Facilitation of New Northern Line Ticket Hall
 - 2,000+ cycle parking spaces;
 - 2x Cycle Hire Docking Stations (and retention/relocation of the existing one);
 - Significant public realm investment and improved permeability;
 - Signage and wayfinding strategy to be developed;
 - Bus stop upgrades and real-time public transport information;
 - Car free development.
620. A suite of softer measures will be offered both by the residential management company and the University, including the presentation of a resident travel pack as part of the broader 'Welcome Pack' for all new occupiers and the promotion to staff and students of the University's "Travel Pack", which maps the local area, local facilities and travel options, and includes information on carbon off-setting.
621. It is proposed to appoint a Travel Plan co-ordinator to act as a focal point for contact and to monitor and evaluate the success of these interventions over time. The approach to travel planning is acceptable and officers are content that the scheme comprises a range of interventions that will facilitate more sustainable travel to and from the site.

Highways works

622. The development requires a range of highways works to both reflect the quality of the new architecture and public realm and to mitigate the impacts of a development of this scale. The scope and phasing of the permanent highways works will be outlined in the s106 agreement and their delivery ultimately secured through s278 Agreements with

the council and Transport for London, where appropriate. These works are anticipated to include:

East Site:

- Remodelling and paving of footpaths and kerblines around the perimeter of the site;
- Provision of a new servicing access and associated footway/carriageway works;
- Remodelling of the Elephant Road/New Kent Road junction;
- Installation of a raised table on Elephant Road between market square and 'route through the arches'.
- Relocation of bus stops on New Kent Road/Elephant and Castle;
- Realignment of existing cycle hire docking station to the south of the shopping centre;
- Installation of short stay cycle parking;
- Tree planting.

West Site:

- Remodelling of footpaths and kerblines around the perimeter of the site;
- Re-design and landscaping of eastern side of Oswin Street;
- Installation/relocation of short stay cycle parking;
- Tree planting.

623. In addition to these permanent works, a series of temporary highways works will be required during demolition/construction to adequately mitigate the impacts of these processes. It is anticipated that such measures will be clearly identified in the relevant demolition/construction environmental management plans, which will be prepared for each Phase.

Adoption and Stopping Up of the Public Highway

624. The comprehensive redevelopment of the site creates a new relationship between the building footprints, public realm and land that is formally recognised as Public Highway. It is proposed that various parcels of land on both sides of the peninsula are 'adopted' and/or 'stopped up' so that anomalies linked to previous road layouts are addressed and a coherent area of land is recognised as forming part of the Public Highway. This is a formal process to be pursued separately under s247 of the Town and Country Planning Act. Detailed plans will be appended to the s106 agreement, but the changes can be summarised as follows:

East Site

| Land to be stopped up | Land to be adopted |
|---|---|
| Two parcels of land south of the Shopping Centre at corner of Walworth Road | Land at back of footway on eastern side of Elephant and Castle; |
| Lower area around Shopping Centre perimeter | Land between Shopping Centre and new peninsula; |

West Site

| Land to be stopped up | Land to be adopted |
|-----------------------|--------------------|
| | |

| | |
|--|--|
| Existing turning head off Pastor Street (currently LCC storage) | Land running along eastern side of Oswin Street; |
| Sliver of land adjacent to LCC public realm | Land along northern boundary of LCC building between peninsula and Oswin Street; |
| Triangular area of public realm between the LCC building and St Georges Road | |

Transport conclusions

625. The characteristics of the site mean that anticipated trip generation, demolition/construction activities and servicing demands all present challenges. However, it is clear that the scheme secures significant improvements in public transport infrastructure and the public realm, both key ambitions of the Elephant and Castle SPD. The council and TfL are satisfied that through a combination of design and through the imposition of detailed planning conditions and obligations, the transport impacts described above can be successfully managed and/or mitigated, though this will in some instances require robust monitoring and enforcement. Subject to these measures being secured, the transport impacts are considered to be in accordance with the Development Plan.

Air quality

626. The site sits within an air quality management area. Policy 7.14 of the London Plan 'Improving Air Quality' seeks to minimise the impact of development on air quality, and sets a number of requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality. A number of neighbouring residents have raised impacts upon air quality as a concern following public consultation on the application.
627. Air quality is considered in chapter 10 of the ES; the acceptability of the air quality on the proposed uses within the development has been considered in the quality of accommodation section of this report.

Demolition and construction phase

628. The ES advises that the main impact upon local air quality during demolition and construction would relate to dust. Measures to reduce this would be secured through a construction management plan which could include damping down dusty materials. It could also include the use of low emission plant and machinery and with mitigation measures in place, the ES predicts that impacts on air quality during demolition and construction would be insignificant.

Completed and operational development

629. The impact of heating plant emissions and traffic have been considered within the ES. It concludes that the development would not give rise to significant air quality effects and that it would be air quality neutral, largely owing to a reduction in vehicle trips by way of reduced parking compared to the existing situation. As set out in the quality of accommodation section of this report, a condition is recommended requiring details of the heating plant chimney stack height and dispersal model to be submitted for approval. The ES concludes that the completed and operational development would have an insignificant impact upon air quality.

Conclusion to air quality

630. Subject to conditions, it is concluded that the proposal would comply with the development plan in relation to air quality.

Ground conditions and contamination

631. Policy 5.21 of the London Plan advises that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.
632. Ground conditions and contamination are considered in chapter 11 of the ES. Potential receptors for contamination include construction workers, users of the proposed development, current and future off-site users of the site, and shallow and deep ground waters.

Demolition and construction

633. Two desk-based preliminary risk assessments were carried out in July 2014 and August 2015, and were updated in 2016 to reflect the current planning application. The assessments identify the potential for contaminated land owing to past industrial uses on the site, and potential impacts during construction owing to storage of potentially contaminative materials on the site. A detailed site investigation would be undertaken prior to demolition and construction determine and quantify the level of any contamination present, and to inform any necessary remediation strategies. With mitigation measures in place the ES predicts that the impact of contamination would be insignificant.
634. The ES also identifies the potential for unexploded bombs, and recommends that a specialist engineer be present on site during below ground works. An informative to this effect is recommended, which advises that the Police and the Council's Emergency Planning and Resilience Officer should be notified in the event that any anomalies are detected.
635. EPT has reviewed the application in relation to contamination, and conditions for further investigation have been included in the draft recommendation.

Completed and operational development

636. The ES advises that the construction process would result in the removal of a significant volume of contaminated material from the site.
637. Much of the completed development would comprise buildings and hardstanding which would create a barrier to any residual contamination in the remaining soil and groundwater beneath the site. Whilst ground level gardens are proposed for plot W3 (the mansion block), this part of the site is not recorded as having been used for industrial activities in the past and clean top soil would be imported to create the new gardens. Contamination impacts for the completed development are predicted to be insignificant. The only exception to this is in relation to groundwater where the impact is predicted to be long-term, local, minor and of beneficial significance, owing to the removal of large quantities of contaminated soil from the site.

Conclusion to ground conditions and contamination

638. Subject to conditions, it is concluded that the proposal would comply with the development plan in relation to ground conditions and contamination.

Water resources and flood risk

639. Policy 5.13 of the London Plan advises that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Strategic policy 13 of the Core Strategy sets a target that major development should reduce surface water run-off by more than 50% and policy 15 of the Elephant and Castle SPD requires public realm to incorporate sustainable urban drainage systems.
640. Chapter 12 of the ES considers water resources and flood risk. In relation to water resources it considers the impact of the proposed development on the capacity of foul and potable water supply infrastructure. For flood risk it considers whether the proposed development would increase the risk of flooding on or off the site, together with surface water drainage. Concerns have been raised by the Metropolitan Tabernacle that they have experienced a number of floods in their basement in recent years, potentially linked to the significant redevelopment being undertaken in the area.

Water resources

Demolition and construction

641. The ES predicts that demolition and construction activities would result in a temporary, minor increase to foul water flows, but given the low volumes expected this is would have an insignificant effect upon the Thames Water network.

Completed and operational development

642. The ES advises that there would be an increased demand for water supply as a result of the proposal, but that the implementation of water efficiency measures such as low flow water fittings would be incorporated to minimise demand as far as possible. The ES predicts that there would be insignificant impacts upon foul and potable water infrastructure capacity.
643. Thames Water has reviewed the application and advised that the existing water supply infrastructure has insufficient capacity to meet the additional demands of the proposed development, and as such has requested that a condition for an impact study be imposed upon any forthcoming permission. This has been included in the draft recommendation, together with other conditions recommended by Thames Water including for piling method statements to protect existing infrastructure.

Flood risk

644. The site is located in flood zone 3 which is identified as having a high risk of flooding. Paragraph 100 of the NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. However, the Council's Strategic Flood Risk Assessment acknowledges that development within flood zone 3 is required, and is allowed with the application of the Exception Test set out the NPPF.

645. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and that a site-specific flood risk assessment must demonstrate that no adverse impacts would occur.
646. The site is located on previously developed land and there are strong sustainability reasons why it should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall in housing in the area. The site has excellent access to public transport, and the proposed design is capable of providing good quality housing, with less vulnerable commercial space at ground floor level for all but plot W3 on the west site. The site is located within an opportunity area where significant new development is supported in principle, and the east site is designated a proposal site.

Demolition and construction phase

647. The ES identifies that demolition and construction work could result in a temporary risk of surface water flooding, and recommends that measures be put in place to prevent. It also identifies the potential for localised groundwater flooding during excavation works to construct the proposed basements. The submission advises that construction practices would be employed to prevent this and that with these in place, the impact would be insignificant.
648. The Council's Flood and Drainage Team has reviewed the application and requested the submission of a Basement Impact Assessment which was duly submitted. The assessment has been considered by the Flood and Drainage Team and is generally acceptable, although a condition for further details is recommended.

Completed and operational development

649. Although flood zone 3 has a high risk of flooding, the site is protected by the Thames flood defences therefore the risk of flooding from the Thames is considered to be low. In the unlikely event that the Thames flood defences were breached coupled with an extreme water level, it is predicted that part of the site would experience flooding. As mitigation the ES recommends a condition for a flood evacuation plan, and this forms part of the draft recommendation.
650. The Environment Agency (EA) has considered the application and has no objections, but has issued advice relating to finished floor levels, measures relating to safe access to and from the proposed basements, and regarding flood evacuation plans and these have been included in the draft recommendation. The ES predicts that proposed development would not increase flood risk elsewhere and that flooding impacts would be insignificant. The objection received from the Tabernacle has been shared with both Thames Water and the Council's Flood and Drainage Team, who are satisfied that the proposal would not result in any adverse flood risks.
651. A surface water drainage strategy has been submitted which includes measures to reduce water run-off from the site and takes into account potential future increases in rainfall owing to climate change. Surface water run-off from the site would be attenuated through the use of underground storage tanks and a green roof. Through these measures surface water run-off would be reduced by 50% over the existing situation. The ES predicts that this would have a long-term, local, beneficial impact of minor significance. Officers are satisfied with this conclusion given the responses

statutory and internal consultees and having taken all other consultation responses into account.

Conclusion to water resources and flood risk

652. Subject to conditions, it is concluded that the proposal would comply with the development plan in relation to water resources and flood risk.

Sustainable development implications

653. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. Of note is that residential buildings must now be carbon zero, and non-domestic buildings must comply with the Building Regulations in terms of their carbon dioxide emissions.
654. Policy 19 of the Elephant and Castle SPD 'Energy, water and waste' requires development to meet the highest possible environmental standards in line with the Core Strategy, the London Plan, Code for Sustainable Homes (now withdrawn) and BREEAM. Concerns have been raised in response to public consultation that the proposal would not comply with the Council's energy policies.
655. The applicant has submitted an energy strategy in support of the application, based on the Mayor's energy hierarchy. A supplementary document has been in order to address concerns raised in the GLA's stage 1 report.

Be lean

656. The use of passive design energy efficiency measures such as high performance glazing and insulation and low energy lighting would result in a 4% reduction in carbon dioxide emissions compared to a scheme compliant with the Building Regulations.

Be clean

657. The site is within close proximity to the Elephant Park district heating network which is on the site of the former Heygate Estate. It has been designed to service all of the new homes being delivered on that site, and would have capacity to serve the proposed development as well. As the neighbouring energy centre has not yet been completed, the proposed development would be future-proofed so that it could connect to this network in the future, and clauses to secure this are required in the s106 agreement.
658. The development would have its own Decentralised Energy Network (DEN) served by an on-site energy centre within the basement of the east site. This would be run by high efficiency gas-fired boilers and combined heat and power (CHP) engines. This would deliver all of the domestic hot water for the development and up to 45% of the space heating requirements, resulting in a 22% reduction in carbon dioxide emissions compared to a scheme compliant with the Building Regulations.

Be green

659. Solar photovoltaic panels are proposed on the roof of the proposed LCC building to provide electricity. This would result in a 1% reduction in carbon dioxide emissions

compared to a scheme compliant with the Building Regulations.

660. A combination of the above measures would deliver a 27% reduction in co2 emissions across the entire development. A 35% reduction is required for the commercial space (24% would be achieved), and carbon zero is required for the residential units (a 31% reduction would be achieved). The proposal would therefore fall short of the policy requirement. A contribution of £2,234,600 towards the Council's carbon off-set fund would therefore be required, comprising £1,213,473 for the east site and £1,021,127 for the west site and terms to secure this have been included in the draft s106 agreement, together with clauses to secure the on-site measures.
661. The GLA has reviewed the additional information submitted and is satisfied with the proposed energy strategy.
662. Southwark's strategic policy 13 of the Core Strategy 'High environmental standards' requires developments to meet the highest possible environmental standards, and sets the following targets relevant to the application:
- Community facilities should include at least BREEAM 'very good'
 - All other non-residential development should achieve at least BREEAM 'excellent'
 - Major developments should achieve a 44% saving in carbon dioxide emissions above
 - the building regulations from energy efficiency, efficient energy supply and renewable
 - energy generation
 - Major development must achieve a reduction in carbon dioxide of 20% from using onsite
 - or local low and zero carbon sources of energy
 - Major developments must reduce surface water run-off by more than 50%
 - Major housing developments must achieve a potable water use target of 105 litres per person per day.
663. The submission advises that most of the non-residential elements of the development would be capable of achieving BREEAM 'excellent', although the retail floorspace and cultural venue would target 'very good', with an aspiration for excellent. This is because these facilities would be fitted out by the end users which is not within the applicant's control, and a number of the BREEAM credits are available at the fit-out stage. Whilst this is noted, the proposal is for a large new retail development, and if BREEAM excellent can't be achieved on a proposal such as this, it is questionable where it could be achieved. Future tenants could be made aware of the requirements and plan accordingly, therefore a condition requiring BREEAM 'excellent' to be met is recommended. The development would only achieve a 1% reduction in carbon dioxide emissions from renewables, well below the SP13 target which is predominantly due to limited available roofspace for PVs. Surface water run-off and water use have been seen considered in the water resources and flood risk section of this report.

Overheating assessment

664. This has been undertaken to evaluate the risk of overheating during the summer months. The findings are contained in the energy strategy, and no overheating risk has been identified.

665. Saved policy 3.3 of the Southwark Plan advises that planning permission will not be granted for major development unless the applicant demonstrates that the economic, environmental and social impacts of the proposal have been addressed through a sustainability assessment; the applicant has submitted a Sustainability Strategy to address this requirement. These issues are also considered in a number of the other planning application documents, including the ES, the Equalities Statement and the Energy Strategy.
666. The proposed development would generate a significant number of construction jobs and the construction process would give rise to expenditure in the local and regional economies. It is estimated that between 395 and 572 new jobs would be created in the completed development which would contribute to the regional economy. Existing businesses would be displaced as a result of the proposal, and measures to support them have been set out in the land use and equality implications section of this report. The provision of new retail, leisure and education floorspace would have positive social impacts. The provision of 797 new residential units would contribute to the stock of housing in the borough, and 36% affordable housing including social rent equivalent units (in terms of rent levels) would be provided. The new residential population (approximately 1,850 people) has the potential to contribute an additional spend of £1.6m per annum in the opportunity area and £3.6m per annum in the borough. This would have positive economic and social impacts within the borough. It is noted that borough CIL contributions would be secured to contribute towards the infrastructure required to support growth.
667. Measures relating to environmental sustainability have been set out above, including passive design measures, a site-wide energy centre, solar photovoltaics and a contribution towards the Council's carbon off-set fund.

Conclusion to sustainable development implications

668. Subject to conditions and s106 obligations it is concluded that the proposal would comply with the development plan in relation to sustainable development implications.

Archaeology

669. Part of both the east and west sites sit within the Kennington Road and Elephant and Castle Archaeological Priority Zone (APZ). Policy 7.8 of the London Plan advises that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. Saved policy 3.19 of the Southwark Plan is also relevant, which sets out the Council's approach to protecting and preserving archaeology within the borough.
670. Archaeology is considered in chapter 13 of the ES. It advises that the site has the potential for archaeological remains, and that the survival of these remains is varied and localised, with survival more likely in open areas than areas currently occupied by basements. The likely effects arising from the proposed development would be from excavation and foundation works.

Demolition and construction

671. The ES advises that no buried heritage assets of very high significance which would

merit in-situ preservation are anticipated, and that with an agreed programme of archaeological works including excavation and recording the impacts would be insignificant. However, as set out below additional archaeological information has been requested and submitted during the course of the application.

East site

672. The Council's EIA scoping opinion advises that the most significant archaeological site within the Elephant and Castle area is the Newington Butts Theatre, which could be the earliest Shakespearian theatre in London. Its precise location is unknown, although the Survey of London locates the theatre on the east side of Walworth Road near the junction with the New Kent Road. Given the earlier junction arrangements at Elephant and Castle when the survey volume was written, it may well place the potential location of the theatre near to the Charlie Chaplin Pub or in the area to the north of the shopping centre. The scoping opinion advises that a desk-based assessment be undertaken which should examine records in an effort to locate this potentially nationally important site which if located, would likely be considered nationally important, requiring preservation in-situ.
673. The applicant has submitted a Desk Based Assessment which includes a thorough analysis of the likely location of the Shakespearian theatre. However, it did not contain sufficient information to establish whether the theatre could survive on the site. Additional information has subsequently been submitted, and it is recognised that most remains under the shopping centre are likely to have been removed, with only a few pockets where archaeology could potentially survive. As such conditions are recommended, including for details of the foundation and basement design to be submitted for approval. In the event that the theatre is located beneath the site, the foundation and basement designs would likely have to be amended to enable it to be preserved in-situ.
674. It is considered that both the Coronet and the Shopping Centre should be recorded prior to demolition, and a condition to secure this is recommended. Although the Coronet was not recommended for statutory listing, it is a significant theatre building with links to important theatre architects and performers and the Shopping Centre is generally referred to as one of the first enclosed shopping centres in the UK.

West site

675. The desk-based assessment also identified the possibility of there being a post-medieval burial ground on the west site, and officers requested that trenches be dug before the granting of any planning permission. However, following the submission of additional information it is recommended that this matter be addressed by way of conditions.
676. In accordance with the Council's adopted Planning Obligations and CIL SPD a contribution of £11,171 towards archaeological mitigation is required, and a clause to secure this has been included in the draft s106 agreement. This should be split across both sites, with a requirement for £5,585.50 for each site.

Completed and operational development

677. The operational and completed development would not involve any ground disturbance, therefore there would be no additional archaeological effects.

Conclusion to archaeology

678. Subject to conditions and a planning obligation it is concluded that the proposed development would comply with the development plan in relation to archaeology.

Wind microclimate

679. This issue is covered in chapter 14 of the ES which considers the likely wind conditions as a result of the proposed development, and the suitability of those conditions for pedestrian comfort and cyclist safety. Measurements were taken at 452 locations on and around the site. Concerns have been raised by the Metropolitan Tabernacle that wind microclimate has not been adequately assessed in relation to their building. Whilst the congregation use the main entrance from Elephant and Castle, the day-to-day entrance is at the north-west corner of the building accessed by a pathway which sits between the Tabernacle and the existing LCC building.
680. This section considers the impact of the proposed development with the existing surrounding buildings in place, and mitigation measures incorporated. Separate testing has been undertaken to consider the cumulative scenario with the proposed development in place, and all buildings consented / under construction having been completed, and this is set out in the EIA section of this report under cumulative impacts.

Demolition and construction

681. The ES advises that during demolition and construction and with mitigation for the completed development in place before site hoarding is removed impacts would be insignificant and from temporary minor adverse to beneficial. As the assessment identifies the impacts are insignificant to minor adverse this indicates that mitigation is unlikely to be needed. Should areas that are temporarily exposed thought to be at additional risk, extra measures such as restricting access should be considered through the construction management plan.

Completed development

682. The ES predicts that for thoroughfares, the cycle superhighway, at bus stops and within proposed amenity space wind conditions would be acceptable, with impacts ranging from insignificant, and insignificant to moderate beneficial. This is on the basis that mitigation is in place including landscaping and tree planting, solid bus shelters and vertical baffles / screens; limited details of the baffles and screens have been provided, therefore a condition is recommended. At building entrances the ES predicts that with mitigation in place through recessing the entrances, impacts would be minor adverse to minor beneficial. The ES predicts that wind microclimate would have an acceptable impact upon cyclists, subject to screening being installed along areas of the cycle superhighway.
683. As stated, the Council has appointed an independent consultant to review the wind microclimate information. The consultant has advised that a number of receptors could experience some minor adverse effects, including potential impacts upon frail and elderly pedestrians, and that further mitigation is required. Areas where this could potentially occur include at the junction of Elephant Road and Walworth Road, close to the Metropolis Apartments on Oswin Street, and near the northern entrance to Pastor Street. Whilst predicted wind speeds are considered to be safe for cyclists, there remains a possibility, , due to the limitations of the measurement locations in the wind

tunnel testing, of cyclists being affected by gusts of wind, which could be addressed through additional mitigation. It is therefore recommended that the number screens for the cycle superhighway are increased along the stretch that goes from Newington Butts into St Georges Road. Currently, only three screens are proposed and there is a risk that these current screens would not provide sufficient sheltering from the strongest winds.

684. A condition has been included in the draft recommendation to secure the proposed and additional mitigation, and it is noted that any screens along the cycle superhighway are likely to require consent from TfL as Highway Authority. A number of new trees are proposed in the public realm which could be positioned to act as wind-breaks.
685. In response to concerns raised by the Metropolitan Tabernacle, the applicant has submitted some additional commentary advising receptors around the day-to-day entrance to the Tabernacle would fall within acceptable limits. However, the Council's consultant has advised that two additional receptors should be tested, one at the entrance and one underneath the archway leading to the passageway to the northern side of the Tabernacle and this has been included in the draft condition.

Conclusion to wind microclimate

686. Subject to conditions it is concluded that the proposal would comply with the development plan in relation to wind microclimate.

Health Impact Assessment

687. Policy 3.2 of the London Plan 'Improving health and addressing health inequalities' (c) states that 'The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA).' Improving health is a cross-cutting theme through many of Southwark's policies, particularly core strategy policies 2 (transport), 7 (family housing) and 11 (open spaces).
688. A Health Impact Assessment has been submitted with the application which considers the impact of the proposed development upon health and wellbeing. It concludes that the proposal would have mostly positive effects, and some uncertain effects because of uncertainty over relocation support and the employment policies of potential contractors need to be concluded.
689. A draft local business support and relocation strategy has subsequently been submitted setting out measures to assist affected businesses. The employment policies of potential contractors are not known at this stage, but as set out in the planning obligations section of this report, jobs and training for unemployed Southwark residents would be secured through the s106 agreement.
690. The Council's Public Health Team (PHT) has reviewed the HIA and advised that the affordable housing proposed would impact positively on health, and that taking economics into account, all segments of the community including older people who are not in full employment should be able to qualify as a tenant. The affordable housing which would be at rent levels equivalent to social rent would be available to all eligible segments of the community, including older people and there would be no requirement for tenants to be economically active. For the other discount market rent levels these would be available on the relevant intermediate housing list which is anticipated to be

in place within the next 12 months. The PHT has commented that three year tenancies would be better than what is generally currently offered in the private rented sector, but would be less secure than social housing managed by the Council and Housing Associations. PHT has requested further clarification on whether the tenancies could be renewed, and the criteria for doing so. As set out in the affordable housing section of this report, the three year tenancies could be renewed.

691. PHT has further commented that the loss of and lack of any affordable retail on site is such that the proposed shopping centre would not be as reflective of the diverse local community than at present, and that the applicant's Equalities Statement identifies a potential negative effect on BAME business owners and older business owners. However, affordable retail would now be provided on site, and a contribution towards off-site provision would be provided. Overall the health impacts of the proposed development are considered to be acceptable.

Conclusion to health impact assessment

692. Subject to conditions and planning obligations it is concluded that the proposal would comply with the development plan in relation to health.

Ecology

693. Policy 7.19 of the London Plan 'Biodiversity and access to nature' requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity wherever possible. Saved policy 3.28 of the Southwark Plan states that the Local Planning Authority will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, and will require an ecological assessment where relevant.
694. As part of the EIA scoping application an extended phase 1 habitat survey was undertaken, together with external building inspections for roosting bats, ground based tree inspections for roosting bats, an evening emergence bat survey, and black redstart survey. They demonstrated that the existing buildings on the site and areas of hard-standing are of negligible to low potential for roosting bats, and overall the site had negligible ecological value, with only the existing trees and an area of brown roof contributing to its ecological value. The survey concluded that the proposed development would not result in any adverse ecological effects, and it was agreed that ecology could be scoped out of the Environmental Statement.
695. The application has been reviewed by the Council's Ecology Officer who has advised that as the bat activity survey which was undertaken is now more than two years old, it should be re-done. This has been undertaken and no bats were recorded.
696. The site is large and has potential to offer significant ecological enhancements through new planting in the public realm and communal gardens. A number of conditions are recommended to enhance the ecological value of the development, including the inclusion of nesting boxes / bricks, details of the green wall on the west site, and for the submission of an ecological management plan. Only plot E1 is shown as having a green roof, and a condition requiring an additional green roof to one of the buildings on the west site is recommended.

Conclusion to ecology

697. Subject to conditions it is concluded that the proposal would comply with the development plan in relation to ecology.

Socio-economic impacts

698. The predicted socio-economic impacts of the proposed development are set out in chapter 7 of the ES. It advises that at present it is estimated that the existing development supports 1,418 full-time equivalent jobs. The majority of these (45%) are based in the office space in Hannibal House, followed by 32% at the LCC, 21% from retail and food / drink uses, and 1% from leisure uses. The proposal would deliver New Homes Bonus revenues of £9 million over 6 years, of which two thirds would go to the Council and the remaining third to the GLA. It would also generate approximately £1.5m in Council Tax revenue per year.

Demolition and construction

699. The ES identifies the adverse effects arising from the loss of the existing uses on the site during construction, some of which could be reduced through a relocation / support package for existing businesses, and others which could not including the loss of leisure floorspace during construction. There are alternative shopping facilities including for affordable food along Walworth Road and East Street Market. With regard to leisure, there are no other bowling or bingo facilities within close proximity to the site, although for retail, the shops and services along Walworth Road are in close proximity.
700. The ES predicts that for business and leisure floorspace there would be temporary, adverse effects of minor significance at a local level, which would be insignificant at a district level. The ES predicts that loss of community floorspace, owing to the possible location of some of these services, would be insignificant at a local and district level.
701. The ES estimates that there would be approximately 1,230 construction jobs per year for the 10 year build programme, with a predicted increase in the level of expenditure locally from construction workers. As stated clauses would be included in the s106 agreement to secure jobs, training and construction industry apprenticeships for unemployed Southwark residents, and it is recommended that this includes measures to ensure that residents sharing protected characteristics can fully share in these opportunities. The ES predicts that construction jobs would result in temporary, beneficial effects of moderate significance at both a local and district level.

Completed development

702. The completed development would positively contribute towards meeting local and regional housing targets and would create generate between 1,813 and 1,990 gross new jobs, depending on the exact nature of the commercial uses which would ultimately come forward; this would be an increase of between 395 and 572 and again, measures to secure jobs for unemployed borough residents through the s106 agreement are recommended. Whilst there would be a reduction in leisure floorspace, there would be increases in retail, education and residential. The ES acknowledges that the new population would result in further demand for education and health provision, but a substantial amount of CIL would be required which could be used to deliver additional facilities.
703. The ES notes that there is a shortage of open space both within the opportunity area and across the borough, and that the proposed development would result in additional

pressure on existing open spaces. The ES therefore recommends a s106 contribution to improve or expand existing open space. It is noted however, that the ES does not take into account Elephant Park which is being delivered on the redeveloped Heygate Estate, the first phase of which is now open. A s106 contribution would be secured to mitigate the shortfall in private amenity space on the site, and this would be put towards local open space provision.

704. The ES advises that the proposed development could potentially contribute £1.6 million annually within the opportunity area and £3.6 million annually within the borough. The socio-economic benefits arising from the development are concluded to belong-term, beneficial, and of moderate and substantial significance at both local and district levels and would add to the overall regeneration benefits arising from the scheme. Officers concur with this conclusion.

Conclusion to socio-economic impacts

705. It is concluded that subject to s106 obligations the proposal would comply with the development plan in relation to socio-economic impacts.

Planning obligations (S.106 undertaking or agreement)

706. Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's adopted Planning Obligations and Community Infrastructure Levy SPD. A s106 agreement is currently being drafted. Given that TfL own some of the land which the development would be constructed on, they would be party to the agreement. Clauses to secure the following should be included.

East site

707. The following financial obligations should be secured through the s106 agreement:

Archaeology - £5,585.50
Carbon Offset - £1,213,473
Off-Site Affordable Retail £753,384
Tree Shepherd funding £122,825 (the total budget is £145,900 but £23,075 has already been paid)
Relocation fund £634,700
Corsica Studios sound proofing £125,000
Total £2,854,967.50
2% monitoring fee £57,099.33
Grand total £2,912,066.85

708. In addition to the above it is recommended that an affordable housing monitoring fee be secured through the s106 to monitor the complex affordable housing obligations.

709. Non-financial obligations

- Demolition and construction environmental management plans;
- Clauses to secure the delivery of the shopping centre and cinema before a certain proportion of the residential space can be occupied;
- Terms to secure the affordable housing units, including review mechanisms and restricting a proportion of the private units until / unless the affordable units have been completed;
- Clauses to maintain the housing as PRS for a minimum period or to pay a clawback contribution;
- Terms to secure on-site affordable retail;
- Database of relocation opportunities for affected businesses;
- Clauses to secure a community use agreement including events / activities at the proposed cinema and LCC building relevant to people from BAME backgrounds and older people;
- Terms to secure a study into the feasibility of providing additional space in the basement to include uses / activities relevant to people from BAME backgrounds and older people;
- Employment in during construction and in the completed development provisions, including measures to ensure that those sharing protected characteristics can fully engage with these opportunities;
- Clauses to secure the delivery of the station box for the Northern Line ticket hall;
- Clauses to secure a new pedestrian route from the Court through to Elephant Road, either as shown on the plans and including environmental improvements to the existing arches which give access to the shopping centre or an alternative route if that cannot be delivered if they are retained;
- Delivery of highway works and public realm, including management;
- Landscaping to communal gardens including management;
- Delivery of way-finding and signage;
- Provisions for public access through the site;
- Cycle hire provisions;
- Delivery and servicing management plan;
- A scheme of environmental improvements around Elephant and Castle Railway Station;
- Tree planting strategy.

710. West site financial obligations

- Archaeology - £5,585.50
- Carbon Offset - £1,021,127
- Childrens' playspace £50,708.82
- Total £1,077,421.32
- 2% monitoring fee £21,458.43
- Grand total £1,098,879.75

711. An affordable housing monitoring fee should also be secured through the s106 agreement.

712. West site non-financial obligations

- Demolition and construction environmental management plans;
- Completion of the new LCC building before the existing building can be demolished;
- Provision of the cultural venue before occupation of a certain proportion of the residential, and operational management plan for the cultural venue;

- On-site affordable retail;
- Provision of up to 10% affordable B1 space;
- Terms to secure the affordable housing units, including review mechanisms and restricting a proportion of the private units until / unless the affordable units have been completed;
- Clauses to maintain the housing as PRS for a minimum period or to pay a clawback contribution;
- Employment in during construction and in the completed development provisions, including measures to ensure that those sharing protected characteristics can fully engage with these opportunities;
- Delivery of highway works and public realm, including management;
- Landscaping to communal gardens including management;
- Provisions for public access through the site;
- Delivery of way-finding and signage;
- Cycle hire provisions;
- Delivery and servicing management plan;
- Tree planting strategy.

713. In the event that a satisfactory legal agreement has not been entered into by 18th December 2018 it is recommended that the Director of Planning be authorised to refuse planning permission, if appropriate, for the following reason:

The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2016) and the Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and Borough community infrastructure levy (CIL)

714. 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.
715. Concerns have been raised regarding pressure on local services as a result of the proposal. 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 the borough.
716. In this instance a Mayoral CIL payment of £3,762,975 and a Southwark CIL payment of £15,804,382 would be required.

Statement of Community Involvement

717. A Statement of Community Involvement (CSI) has been submitted, setting out the consultation undertaken by the applicant prior to the submission of the planning application.

718. The SCI advises that prior to the submission of the planning application, the applicant held 132 meetings with locally elected politicians, local community groups, local residents and businesses, and statutory bodies. Local groups meetings were held with include:

- Latin Elephant;
- The Walworth Society;
- Plaza Latina/Carnival del Pueblo;
- Southwark Cyclists;
- Southwark Disablement Association;
- Southwark Pensioners Centre;
- Tenants and Residents Associations at Perronet House, Meadow Row, Lawson Estate, Hayles, Albert Barnes House, Draper and Newington TRAs;
- Rockingham Community Association;
- West Square Residents' Association;
- Residents at Strata, Metro Central Heights, Oswin Street,
- Metropolitan Tabernacle.

719. 50 meetings were held with tenants of the shopping centre.

Consultation was undertaken in the following ways

720. A website was launched in July 2015 to provide information on the proposed development.

721. Holding/attending a series of 132 one-to-one meetings/public meetings between January 2014 and July 2016 to receive feedback from locally elected political representatives, local community groups and amenity organisations, and local businesses and landowners located near to the site.

722. Holding a series of drop-in sessions from June to September 2014 attended by 296 people at the shopping centre and other venues to allow users of the Existing Centre and interested parties to provide feedback through a questionnaire about what people like and dislike about the existing shopping centre and to help fashion the design process for its redevelopment.

723. Holding a three three-day public exhibition on July 2015 to publicise the initial plans for the proposed development which was attended by 839 people. This was publicised by writing to all residences and businesses within the opportunity area, of which there are approximately 8,880.

724. Holding a series of public workshops in November 2015 with elected political representatives, local community groups and amenity organisations and local businesses and landowners located around the site, including breakout groups chaired by independent facilitators on the themes of putting the pedestrian at the heart of the Elephant, the new town centre, and integration with London College of Communication.

725. Holding a three-day public exhibition in May 2016 to publicise the proposed development which was attended by 773 people.

Feedback received through questionnaires was as follows

726. The CSI advises that 83.4% of respondents at the second public exhibition supported the development proposals, and the CSI identifies the following broad themes:

- More distinctive architecture required, particularly along Newington Butts and Walworth Road;
- Overshadowing, loss of light and the creation of wind tunnels;
- Pedestrian routes were identified as a key feature of the design, and attendees representing the disabled community were supportive of these elements of the design;
- Retail meanwhile uses – concerns about what would happen when the shopping centre is demolished and creating new retail opportunities in the interim period;
- Concerns about impacts upon existing traders and whether they would be priced out of the new development;
- The provision of rental residential accommodation with 3 year tenancies was supported;
- There were questions around the exact nature of the affordable housing, whether Southwark residents would benefit, what the discounted rents would be and the overall quantum of affordable housing;
- - Support for improved cultural facilities, particularly the cinema, cultural venue and gallery space in the proposed LCC building. Concerns were raised regarding the loss of the building containing the Coronet Theatre, owing to the architectural features therein.

727. The SCI advises that five main changes were made in response to pre-application consultation:

- Relocation of the Northern Line ticket hall to better relate to the Peninsula;
- Changes to the Court to allow for better circulation at first floor level;
- Changes to the variety of the architecture;
- Changes to the service ramp / access;
- Introduction of the proposed cultural venue.

Other matters

Fire safety

728. Concerns have been raised during public consultation on the application that fire safety must be taken into account, and is too important an issue to be left to the Building Regulations. Whilst this is noted, fire safety continues to be a matter for the Building Regulations and a government-led review is being undertaken as to their adequacy in this respect. The fire safety design of the proposal would be considered by the Building Regulations service provider and the local fire authority, referencing current tall building design guidance.

Conclusion on planning issues

729. The heart of the Elephant and Castle Opportunity Area is undergoing a period of significant transformation, with many key sites within the opportunity core area having already been completed or are under construction. To the north of the site there is a resolution to grant planning permission for a new mixed use development at Skipton House including retail, office, cultural and residential space; to the east of the site there is a mixed-use development at Elephant One, and significant new housing, a new park and commercial uses are being delivered on the redeveloped Heygate

Estate. The Strata Tower is to the south of the site which was completed in 2010 and signalled the beginning of the regeneration of the area. To the west are the recently completed One the Elephant development and Castle Centre, and the 360 Tower is currently being constructed further west again. The application site is the last piece in the puzzle, with the east site particularly pivotal given its location at a transport hub.

730. The application has been assessed against the relevant policies in development plan. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan, the Core Strategy, and the Saved Southwark Plan.
731. There are a number of areas where the proposed development would not conform with the development plan. The proposal would exceed the density threshold set out in the Core Strategy, and aspects of the affordable housing proposal would not be in conformity with the development plan. At 36% the proposal would just exceed the minimum affordable housing requirement, but the proposed tenure split would not comply with the Saved Southwark Plan, the Core Strategy or the London Plan. Whilst social rent equivalent units are proposed, they would not be social rented units in the traditional sense, as they would not deliver secure tenancies. However, as indicated in the assessment above officers are satisfied that the maximum reasonable affordable housing would be provided when viability is considered.
732. The proposal would result in significant adverse impacts to a number of properties in relation to daylight and sunlight, particularly those on Oswin Street, Hayles Building and Metro Central Heights. This would be contrary to the provisions of the development plan which seeks to ensure a good standard of amenity for neighbouring occupiers.
733. As for areas where the proposed development would comply with the development plan, this includes land uses. The proposal would deliver increases in A and D class floorspace, with a vibrant and lively mix of uses proposed which would be appropriate to the town centre and CAZ location, and would help to meet the London Plan and Core Strategy requirements to strengthen the role of Elephant and Castle as a major town centre. The delivery of a significant quantum of new housing would comply with the development plan, with the London Plan setting a target of a minimum of 5,000 new homes within the opportunity area.
734. A number of compromises would have to be made in relation to transport, but subject to mitigation through conditions and s106 obligations, the proposal is considered to be satisfactory and in overall conformity with the development plan in this respect.
735. The proposal would also comply with the development plan in relation to mix of dwellings including a policy compliant amount of 3+ bed units, wheelchair accessible housing, quality of accommodation, trees and landscaping, air quality and health impact, and subject to conditions, would comply with the development plan in relation to noise and vibration, ground conditions and contamination, water resources and flood risk, archaeology, wind microclimate, ecology, and socio-economic impacts. Subject to completion of a s106 agreement, the proposal would comply with the development plan in relation to sustainable development implications.
736. It is not necessarily realistic to expect that a proposal of this scale and complexity will satisfy every component of the development plan. Officers are satisfied that the proposal is overall in conformity with the development plan.

737. It is necessary to place substantial weight on the harm to the listed building which has been identified given the duty in the Planning (Listed Building and Conservation Areas) Act (1990) to have special regard to the importance of preserving and enhancing the special historic and architectural interest of listed buildings. Having reviewed the application material together with consultation responses received, officers conclude that there would be harm to the setting of the Metropolitan Tabernacle, the front façade of which is listed. Notwithstanding the substantial weight given to it, officers consider, that this harm would be outweighed by the significant public benefits which would arise from the proposal.
738. There would also be some adverse equality impacts in relation to age and race, both of which are protected characteristics under the 2010 Equality Act. Although it is considered that the mitigation proposed would be sufficient, reasonable and would go some way to mitigating potential impacts, the mitigation would not be enough to eradicate the adverse impacts. Some businesses may cease trading before the shopping centre closes or relocate outside the opportunity area or borough, and the extent of mitigation for the loss of the bingo hall is a concern as discussed above. Section 149 of the Equality Act places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers, and Members must be mindful of this duty in determining this application.
739. The concerns in respect of equality impacts and adverse impact on the listed Metropolitan Tabernacle do not alter officers' assessment that overall the proposal complies with the development plan.
740. The proposal would deliver a number of key objectives set out in the Elephant and Castle SPD including excellent shopping facilities, new leisure floorspace and a cultural venue (albeit that there is a net reduction in leisure floorspace), and increased educational floorspace through a new building for the LCC, helping to strengthen the role of this area as Southwark's university quarter. The proposal would deliver a new station box for future fit-out as a new ticket hall for the Northern Line, another key aspiration in the Elephant and Castle SPD which the proposal would help to facilitate.
741. Overall the proposal would make a substantial contribution towards delivering the strategic and local objectives for the Elephant and Castle Opportunity Area, and given the significant public benefits which would arise from the proposal and its overall conformity with the development plan, it is recommended that planning permission be granted, subject to conditions and following the completion of a s106 agreement.

Community impact statement

742. In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.
- a) The impact on local people is set out above.
 - b) The following issues relevant to particular communities/groups likely to be affected by the proposal have been identified above.

- c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above. Specific actions to ameliorate these implications are set out above.

Consultations

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

Consultation replies

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

Summary of consultation responses

Environmental Protection Team

745. Approval with conditions. EPT have acknowledged the potential for disruption during demolition /construction and that control mechanisms identified are appropriate. A more comprehensive range of mitigation measures would need to be set out in demolition and construction management plans prior to the commencement of those works.

Flood and Drainage Team

746. Whilst an assessment of the risk of flooding from groundwater has been undertaken, given the size of the proposed basements, not enough detail is provided. Full basement impact assessment (BIA) is required, which should include more details of risk of impeding groundwater flows and levels, and the risk of flooding from surface water. Principles of the drainage strategy are acceptable, but further details are required (condition recommended).
747. Subsequent comments - Have reviewed the BIA, and are generally satisfied with the information provided. However, as the BIA states that 'specific site investigations shall be procured in RIBA stage 3. The general ground conditions and groundwater conditions shall be investigated' a condition is recommended

Waste Management

748. Minor modifications to proposed waste management strategy required.

Emergency Planning and Resilience Officer

749. Informative recommended that if any UXO anomalies are detected during survey work, the Council and the Police must be informed.

Public Health Team

750. Affordable housing and 3 year tenancies welcomed. People not in full employment must be able to qualify as a tenant. Tenancies less secure than social rented housing. Further information required about whether the tenancies could be renewed and criteria for doing so. Lack of affordable retail is disappointing given the ethnic mix of retailers in the area and would result in a less vibrant and diverse mix of uses. This raises equalities issues. Mitigation is required.

Highways Development Management

751. Detailed comments provided on the scope and specification of highways works on Southwark roads. This will be referenced in the s106 agreement and delivered via the s278 process.

Ecology Officer

752. Updated bat survey required and conditions recommended. Subsequently confirmed that updated bat survey is acceptable.

Councillors Lury, Merrill and Seaton (East Walworth Ward)

753. Not opposed to the regeneration of the Elephant and Castle, and recognise the need for the replacement of the current shopping centre, but have concerns regarding the planning application which is due to go to committee on 18th December. Do not object in principle to the proposed design for the new shopping centre, but have concerns regarding the following:
- Delivery of affordable housing. Delancey proposing a 36% affordable PRS housing development but there will only be 3% homes let at council social rents. Conversely, if you earn £80,000 it is possible to qualify for an affordable PRS flat, based on the current application. On a development of nearly 1000 homes, this equates to 33 properties at council social rents.
 - Delivery of affordable retail units. Delancey are policy compliant on the LCC site, offering 10% affordable retail, but the proposal for the current shopping centre site is 5%, with the other 5% provided through a payment in lieu to redevelopment the garages under Perronet House for the market traders to move to. Do not believe that this renders the application compliant, and it is far from certain that this proposed move can happen.
 - Equalities impact. Two protected groups, BAME individuals, and older people, are discriminated against with the removal of the bingo hall from the shopping centre. Space for a bingo hall should be re- provided within the new shopping centre development.
 - Breaking up existing communities. As Councillors will have heard at Council Assembly on 29 November, the traders at Elephant and Castle Shopping Centre do not feel that they are being properly consulted about their futures. The current plans do not propose moving traders in a cluster, keeping the community together.
 - Legal enforceability. Is commendable that Southwark Council is looking to lead on the development of PRS schemes, but there is no Southwark Council agreed policy. The policy is currently being developed, and will form part of the new Southwark Plan which will be agreed towards the end of 2018. This application will likely help to set the policy going forward, and the current plans do not deliver what we want to achieve as a Council. Are also concerned that with no existing policy, there may be implications about the legal enforcement of any proposal made by Delancey and passed by a planning committee.
754. Want to see regeneration at Elephant and Castle that delivers for those that live and work in the area, as well as those that we want to see moving into the area. However, do not believe that the current proposals are adequate to fulfil these criteria. Request that this application does not get approval until these outstanding matters are brought in line with Southwark's policies, and the detailed paper work for the PRS enforcement

and traders compensation is fully completed so that the committee can take a judgement clearly knowing all the implications.

755. Greater London Authority (GLA) stage 1 report

- Principle of development – This mixed use scheme positively responds to strategic objectives for the regeneration of the Elephant and Castle Opportunity Area;
- Mix of uses – The mix of proposed residential, retail, leisure and educational uses is strongly supported for this CAZ location. The applicant, nevertheless, needs to work with Southwark and existing occupiers to progress the detail of its business relocation strategy.
- Housing – The proposed build to rent housing contribution (35% affordable housing) is strongly supported pending an independent viability review;
- Urban design – The scheme would significantly increase the permeability and legibility of the area, whilst successfully accommodating a rich mix of uses that would support the vibrancy and sustainability of Elephant and Castle town centre;
- Transport – The proposed enhancements to transport infrastructure are strongly supported. Notwithstanding this there are a number of transport issues to resolve, including a Northern Line Ticket Hall funding gap and the design of service access from New Kent Road.
- Recommendation – That Southwark Council be advised that, whilst the scheme is strongly supported in strategic planning terms, the application does not yet fully comply with the London Plan.

Transport for London

756. TfL has a direct interest in the scheme which will include a structural box for the new Northern Line station entrance, ticket hall and escalators which London Underground (LU) will fit out. This will replace the current lifts and ticket hall which are inadequate to cope with predicted increases in passenger demand. TfL also owns land within the red line, the site contains areas which are TfL operational land, and TfL is Highway Authority for New Kent Road, St George's Road and Newington Butts. The site is close to cycle superhighways 6 and 7.

- Concept design for new ticket hall progressing well but there is a funding gap. If this cannot be resolved, further funding in the s106 agreement or Development Agreement with TfL will be required.
- TfL has yet to agree the acquisition of land the applicant wishes to obtain from TfL. Would be desirable if both issues could be resolved prior to determination, otherwise Grampian conditions required to control the commencement of the development until they have been resolved.
- Location – very suitable for a high density, mixed use development. Has a PTAL of 6B.
- Pedestrian permeability – would be improved, but are missed opportunities on the east site. Park Route would not link to a crossing on Elephant and Castle and planters and cycle parking in this location limit footway widths. Western arches would be closed off; at least the southern section should be opened up.
- Measures to reduce 'through' pedestrian demand on the eastern side of Elephant and Castle would be supported; opening southern arch route would help with this.
- Potential pinch point at south-west corner of plot E3 which would increase walking distances for pedestrians.

- With layout proposed the use of the footway by cyclists may have to be rescinded, worsening conditions for cyclists – opening up the southern arch route would assist, or setting back the footprint of E3.
- Plot W2 would create a pinchpoint next to cycle track which could create a pedestrian / cyclist conflict which would be unacceptable;
- Wayfinding will be essential, and Legibile London funding should be secured through the s106 agreement;
- Cycle parking would comply with the London Plan, although folding bike storage should not normally count towards this provision unless justified.
- .If accessible car parking were removed, more cycle parking could be provided;
- Some public realm cycle parking would be in inappropriate locations – a cycle hub should be provided.
- Existing cycle hire docking station would need to be relocated or reprovided through a s106 agreement.
- Lack of improvements to the overground station is a missed opportunity – funding for this should be secured.
- Car-free development welcomed and parking permits should be restricted.
- Unlikely to have an unacceptable impact on the public transport network provided new ticket hall, Thameslink improvements and Northern Line capacity improvements delivered.
- Travel Plan with regular monitoring required through s106.
- If west site servicing is inadequate it could impact upon Newington Butts and St George's Road.
- Significant additional traffic on Brook Drive could impact cycle superhighway 7.
- East site servicing access could adversely impact upon buses, pedestrians, bus passengers and cyclists raising safety concerns.
- Servicing for east site was included in the design of Elephant One.
- Crossing needed on New Kent Road which could impact upon servicing arrangements.
- East site servicing represents a safety and operational risk to the TfL road network.
- Potential issues regarding construction management would need to be resolved.
- No dedicated taxi rank is proposed.
- Information will be required to ensure LU assets would be protected – condition for method statement recommended. Also applies to Network Rail.
- Some areas of TfL highway would need to be stopped up.
- S278 agreement required for highway works including street trees. A public realm strategy to secure this should be included in a s106 agreement.
- Detailed s106 requirements provided including cycle hire membership.

757. Detailed comment latterly received on the draft Construction Management Plan (CMP). TfL acknowledge that the CMP is subject to change and emphasise that potential impacts on the TLRN need to be further investigated in future CMPs, particularly on issues including timing and management of site access, the cumulative impact of different site access/egress points operating in tandem and the nature and extent of mitigation measures. Reference is drawn to TfL's 2017 CLP guidance.

London Borough of Lambeth

758. No objection, subject to an analysis of transport impacts. Details of what analysis should take place have been provided.

London Borough of Islington

759. No comments.

City of London

760. No comments.

London Borough of Westminster

761. Objection - Insufficient information has been provided with regard to the visual assessment, particularly the view from 23A.1 and Serpentine Bridge Sequence, for the City Council to determine if there will be an impact on the setting of Westminster World Heritage Site. The graphics within the Townscape, Built Heritage and Visual Impact Assessment relating to views from the Serpentine Bridge gave us reason for concern. Higher resolution images where we can zoom in and that do not pixelate would be helpful. Would like to be able to clearly see the edges of the existing buildings versus the outlines of the proposed buildings (potentially the outlines for proposed could be turned a colour other than white for some contrast with the sky).

762. Subsequent comments following submission of additional information – No objections.

London Borough of Bromley

763. No objections.

Royal Parks

764. Confirm that The Royal Parks would not object to this planning application. The highest proposed building stands at 124.5m AOD. Our guidance on Sky Space visible around the Parks shows a total acceptable height of 125mAOD, 0.5m over the proposed building.

Historic England

765. This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Environment Agency

766. No objections, but advise that flood resistance and resilience measures for the basement and ground floor levels be incorporated on both parts of the site and the basement car parks should be protected from inundation – can be dealt with by way of informatives.

Thames Water

767. Conditions and informatives recommended.

768. Subsequent comments further to them having reviewed Tabernacle objection - Developer is proposing to attenuate 50% of their peak surface water run-off. This will reduce flood risk in the area as the increase in foul water flow will be more than offset by the decrease in peak surface water flows. Request that the Tabernacle contacts Thames Water if any flooding occurs. Regarding sewerage, the London Plan states that brownfield developments within London should reduce their surface water run off

to greenfield run off rates (5l/s/ha). Thames Water do not have concerns regarding this application because we will ensure that the development follows policy 5.13 of the London Plan. As a result there will be betterment to this area of the sewerage network after the development is constructed.

Natural England

769. No objection. Standing advice referred to in relation to protected species.

Health and Safety Executive

770. No need to be consulted on this application and no comments to make.

Network Rail

771. As the site is adjacent to Network Rail's operational railway infrastructure and commercial estate property, NR's Asset Protection Team should be contacted. Advice provided regarding detailed construction matters and future maintenance access.

London Underground

772. Comments will be incorporated within wider TfL response.

Metropolitan Police

773. Initial request for space to be reserved on the east site for police facilities subsequently withdrawn. Secure by design condition required.

Theatres Trust

774. Object to demolition and loss of the Coronet Theatre, a cultural destination for 140 years area on the Trust's Theatre Buildings at Risk register. Recognise need to regenerate the area, but not at expense of its diverse cultural mix. Coronet should be retained as a viable and valuable operation and one of the few music venues of this scale serving this need. Much of 1930s Art Deco auditorium remains and Art Deco street façade could be revealed. Is only venue that remains of Elephant and Castle's cultural heyday as the 'Piccadilly of South London'. To satisfy London and local policy the Council must be satisfied there is no longer a demand for this type or size of cultural facility.
775. Paragraphs 17, 27 and 70 of NPPF relevant to cultural facilities, and policies 4.6 of the London Plan and 4 of the Core Strategy. Is one of only four remaining music venues in the area in London's Grassroots Music Venues Rescue Plan. Would be no replacement facility of appropriate size or nature, and application fails to demonstrate the building is unviable or surplus. Southwark Playhouse and Skipton House venue are not replacements as Playhouse is replacement for another theatre, and Skipton House venue has no clear operator or purpose and would not be live music venue like the Coronet
776. Would be 8 years between loss of the Coronet and provision of small music venue which would not be an equivalent replacement. If permission is granted, Council should ensure an operator for cultural venue is secured who is involved with its design. Is no clear statement about the vision or purpose of cultural facility or its operation. S106 agreement should secure cultural and operational management plan for new

venue, funding for construction, fit-out and technical facilities, bar and ancillary facilities to be operated by venue operator, clarification on lease type, and affordable rent secured including associated bar/retail space.

777. Additional comment following re-consultation - the additional information submitted does not change our position and Theatres Trust continues to object to this application involving the demolition and complete loss of the Coronet Theatre.

778. Cinema Theatre Association

- Object to the loss of the Coronet and support comments made by the Theatres Trust;
- Coronet has value for its architectural quality and as a flourishing music venue;
- Disagree with statement in the planning application that the shell of the Coronet has no architectural merit;
- Planning policy documents for the area should, but do not, recognise the Coronet as a heritage asset or the contribution that it makes to cultural life in the area;
- The planning application documents do not recognise the Coronet has having heritage value;
- The value of the Coronet has been systematically understated and ignored to facilitate comprehensive redevelopment;
- The Coronet makes a major contribution to the cultural and night life of inner south London;
- The Coronet employs over 100 people and attracts 250,000 visitor each year and generates local revenue;
- The Coronet is a major venue owing to its capacity and the replacements offered in9 the master plan would not be adequate;
- The Coronet is shown as a large venue in the Mayor's 2015 'London Grass Roots Music Venue Rescue Plan' which recommended that the protection of music venues be built into the statutory planning process;
- The GLA stage 1 report concludes that the loss of the Coronet is acceptable in the interests of the wider development but this undermines the music venue strategy;
- The proposal would bring an abrupt end to a continuous 140 year long history of popular entertainment in Elephant and Castle;
- The proposal would destroy a rare and important example of the cinema architecture of William R. Glen which retains art deco features;
- The proposal would destroy a building of acknowledge local heritage importance which should be added to the Council's local list of heritage assets;
- The proposal would result in the closure of a flourishing music, cultural and performance venue;
- - The proposal would contradict and undermine the London Music Venue Strategy, and would set a precedent.

Twentieth Century Society

779. Object to the application. The Coronet is a remarkable example of surviving Art Deco auditorium decoration and retains original features externally. It is a non-designated local heritage asset and should be retained. NPPF requires the impacts upon the significance of heritage assets to be considered. Its demolition is not justified and contrary to the NPPF. Fully support comments from the Theatres Trust and the Cinema Theatre Association.

780. Elephant and Castle Traders' Association

- Proposal contrary to SPD29: Land uses, SPD41, SPD45 and SPD53 and does not comply with the Core Strategy and Saved Southwark Plan policies;
- Lack of any affordable commercial units, contrary to SPD1;
- Lack of a relocation strategy for affected retailers – to minimise the impact upon BAME traders a strategy should be submitted which guarantees the retention of existing businesses;
- Relocation strategy must be timely and before permission is granted, as relocation can take 12-24 months;
- Lack of concessions to the diverse character of the area as a migrant and ethnic business centre;
- Recommendations in the report 'The case for London's Latin Quarter: Retention, Growth, Sustainability' should be taken into account;
- Recommendations in the report 'Participatory workshop in the context of the Elephant and Castle Town Centre Regeneration plan' should be taken into account when drafting a relocation strategy;
- The shopping centre is a meeting point for BAME groups and are set to lose the most from the proposed development;
- An equalities statement submitted with the application concludes that there will be adverse impacts on BAME business groups but offers no mitigation. A full equalities impact assessment is required;
- Application documents should be made available in Spanish, in the shopping centre and the Council should accept responses made in Spanish – officer response - Current Government guidance advises against translating documents into foreign languages, other than for emergencies. The developer offered to present the proposals to interested parties in Spanish, and there is in-house Spanish at Tree Shepherd.
- - Concerned about the opening up of arches 6 and 7. The applicant has no contractual relationship with them – question whether there have been discussions with Network Rail

Latin Elephant

781. Object to the application on the following grounds:

- Proposal does not provide any affordable commercial units
- Does not set a clear relocation strategy for retailers directly affected by the development.
- Does not make any concessions to the diverse character of the area as a migrant and ethnic business centre.
- Does not assess wider implications on the local economy
- No Equalities Impact Assessment has been made to assess impact of the development for existing BAME traders in the Elephant and Castle commercial area.
- Concerns over the development of the railway arches
- Concerned about the timing and consultation process for the application.
- The proposal ignores and thus not fulfils recommendations set in the Elephant and Castle SPD, policy 4.8 of the London Plan and the Elephant and Castle Traders' Charter (2007).
- Equalities Impact Assessment should be carried out which considers impacts upon the local population and adjacent shopping parades.
- Should be prioritised return for existing traders.

- The viability and appropriateness of the scheme should consider impact of development for
- existing arterial shopping parades.
- -The Applicant should provide 10% affordable unit spaces, a timely relocation strategy, measures to maximise retention of existing businesses, particularly those of Latin American background.
- Proposal should assess long term implications of the proposed development over the local economy.
- Need clarity regarding consultation and arrangements made with property owners, lease holders
- and traders in the railway arches.
- Need greater compliance with statutory requirements in consultation process. e.g. availability of
- documents in languages other than English and accessibility concerns and additional time in
- the consultation process to allow those who first language is not English time to digest
- proposals and formulate a response.
- To retain character and continuity of the area as a diverse and multi-ethnic retail centre.
- For the Applicant to take into account the development proposals and the
- recommendations of the report 'The case for London's Latin Quarter: Retention, Growth,
- Sustainability'.
- 'Relocation Alternatives for EC Traders' and London's Latin Quarter.

782. Additional comments on draft local business support and relocation strategy

- Does not consider equality impacts, account for diverse retail offer or guarantee continuity of the shopping centre as a specialist centre of economic activity catering to BAME groups.
- Would not deliver 10% affordable retail across both parts of the site.
- Not prepared in consultation with traders and local groups.
- Does not prioritise a return for current independent and BAME traders to the new development.
- Does not consider that BAME traders wish to remain clustered through relocation and in returning to the new development.
- Should be amended to state that the applicant will take steps to help existing traders and businesses benefit from short and long term opportunities offered by the wider Elephant and Castle regeneration, not 'where practical' will take steps...
- Existing traders should be given first choice or prioritised return over new start ups or independent retailers for affordable retail space.
- References to mixed use retail space should consider London plan definition of diversity;
- Traders and local groups should be involved in drafting the relocation strategy and should have an input into the s106.
- Should be a separate compensation fund for loss of trading during relocation period.
- Question the timing of the strategy ,when it would begin, including the allocation of funds.
- Businesses have left the centre and missed out on funds and support.
- Strategy and fund should be staggered so implementation can start as soon as possible. Should allow for a transition period before permission is granted to

include traders who were tenants as of Delancey's take over in 2013 and are currently leaving the shopping centre.

- All existing independent traders should be eligible for Tree Shepherd support;
- No mention of process for disclosure of the database and for it to be publicly available.
- Wording on database vague as does not specify where the units will be, only a broad indication. East Street too far and no mention of clustering.
- Clarity over issues of transparency and equal access to information required.
- Database should be available in different languages and formats;
- No mention of the bidding process and allocation of affordable and vacant retail units or who would be in charge of this process.
- Relocation fund should include reference to loss of trade and does not mention existing businesses returning to the site once the development is completed. Prioritised return for existing traders should be incorporated into the plans;
- Inequitable disposition of affordable retail across the two sites, resulting in less than 10% overall;
- As east site would have more retail, 10% on-site provision should be provided on that site;
- For the 'East Site' the Applicant's proposal offers a total of 25,720sqm of retail floorspace, which already means a loss of 1,484sqm compared to the current Shopping Centre floorspace (27,204sqm), or the equivalent loss of 5.5% in retail floorspace;
- The 5% shortfall in provision of affordable retail on the 'East Site' will mean a loss of 1,286 sqm, which counts for about 15+ units considering the current average unit sizes (estimated at 80sqm per unit).
- Strategy states there will be around 1,200sqm of affordable retail space overall. If this figure is accurate, it would mean that not even the proposed 5% of affordable retail space (which does not to comply with Southwark's planning policy).
- Affordable retail payment in lieu does not comply with the Council's affordable retail policy and would be used for "the provision of affordable retail space elsewhere in the Opportunity Area" which is vague and broad.
- It is considered necessary at this stage to stipulate the tariff set per square metre that will be paid in lieu.
- Strategy advises that up to 10% of flexible commercial space on the west site would be affordable. This should be amended to no less than 10% otherwise there would be as little as 1% provided.
- Tree Shepherd funded by the applicant, but appointed by the Council. This is a confusion of roles and a conflict of interest raising suspicion and lack of trust from existing traders.
- Urgently need a non-disclosure and confidentiality agreement between Tree Shepherd and the traders.

783. Elephant Amenity Network and Southwark Law Centre

- Object on the grounds that there has been insufficient and inadequate consideration of the impact on groups with protected characteristics. The Council and applicant must provide evidence of having done so before the application goes to committee;
- The Council must have regard to its duties under the Equality Act;
- The Council should follow its own published policies or take these into account as material considerations unless there are strong reasons to the contrary including the Council's Equalities Approach (2015), Elephant and Castle SPD, Statement of Community Involvement (2008) and emerging policies in the draft

NSP and Old Kent Road Area Action Plan (AAP)

- Draft NSP should be given weight by decision-makers unless material considerations indicate otherwise. Reasons should be given for not following the emerging policies.
- Draft NSP and Old Kent Road AAP contain policies on business relocation and the AAP provides guidance on relocation strategies which should be considered in relation to the planning application.
- The Council's 9th May cabinet report is flawed as it sets out the number of shopping centre tenants and operators which qualify for support, but does not include Hannibal House offices space, market stalls and businesses in the railway arches.
- 9th May cabinet report fails to explain how it has identified 86 shopping centre tenants which differs from the 77 identified by AECOM in its equality analysis;
- 9th May cabinet report does not make clear how the 27 local operators to be offered support has been reached.
- Failure to explain where market stallholders would be relocated to contrary to Elephant and Castle SPD which support markets.
- Cabinet report flawed as it does not make clear that equality duties relate to Council functions generally including planning decisions.
- 9th May cabinet report fails to consider equality issues arising from businesses not falling within the identified 27 including market stall holders, charities in Hannibal House, employees in shops and users of the bingo hall and bowling alley.
- 9th May cabinet report does not consider mitigation measures in relation to the Latin American community and there is no discussion about mitigation for other groups identified by AECOM.
- Council has not identified with precision the full range of equality implications.
- Council, developer and Tree Shepherd should confirm in writing that all businesses within the red line would be supported by Tree Shepherd.
- 9th May cabinet report does not seek to implement all mitigation measures recommended by AECOM including independent panel to provide business advice, transition strategy and monitoring of equality and diversity issues.
- Mitigation measures in Cabinet report do not follow emerging policy in the Old Kent Road AAP which is a material consideration and would point towards refusal;
- Database of vacant properties is not sufficient; should consider if they are viable relocation opportunities.
- Businesses wishing to cease trading should provide a statement confirming to dispel fears pressure being exerted on businesses to cease trading.
- The Council put shopping centre traders on notice that there would be 4 weeks of consultation on equality issues and business relocation. None took place and all that has happened is the application has been revised.
- Officers must ensure that meetings are held between the Council and the traders to hear their views and ensure they are taken into account.
- Proposal would provide 5% affordable retail on the west site with a 5% contribution and 10% on the west site. As would be more retail on the east site this results in an overall provision of only 5.48% affordable retail across both sites.
- The Council should insist upon 10% affordable retail on the site, avoiding setting a precedent for payments in lieu, and should provide off-site affordable retail in addition..
- Failure to provide 10% on-site affordable retail raises equalities issues.
- The Council should facilitate opportunity for traders to explain their own priorities for a relocation strategy to the applicant.

- The draft strategy should confirm that affordable rent is 40% below market value.
- The strategy should be secured through a s106 agreement.
- Affordable retail contribution should be put towards affordable retail space elsewhere in the opportunity area.
- Additional equalities work should be undertaken before committee including an assessment of the impact upon all businesses within the red line application boundary and further work with existing traders to find out their priorities and concerns regarding relocation;
- Councillors should take the final decision on any s106 agreement.

784. Southwark Green Party

- Lack of social rented housing, contrary to policy;
- Affordable housing should be managed by a housing association;
- Lack of affordable retail units;
- Lack of a relocation strategy for existing traders;
- Relocation of existing traders may not be the best option / applicant should think more creatively about alternative strategies to preserve and enhance current shops and cafes;
- Inadequate range of leisure facilities which would not cater for the whole community;
- Loss of the Coronet / support the view of the Theatres Trust;
- Harm to the listed Tabernacle and Metro Central Heights;
- Lack of attention to green spaces within the redevelopment;
- Loss of light / overbearing impact;
- Loss of privacy;
- Lack of an air quality assessment;
- Missed opportunity to enable active travel and reduce emissions;
- Vague aspirations within the draft travel plan including for deliveries;
- Insufficient cycle parking;
- Specialist cycle parking provision for the mobility impaired, trailers and cargo bikes required.

785. Walworth Greens

- Inappropriate height and massing, especially on the LCC site;
- Loss of light;
- Light pollution;
- Noise pollution;
- Creation of wind tunnels;
- Loss of privacy;
- Excess population density contrary to Southwark and London Plan policies;
- Undersized rooms;
- Lack of social housing and untenable account of affordable housing provision;
- Reduction of non-residential use leading to lack of amenities and limited leisure choices, especially for older citizens;
- Lack of low cost commercial units;
- Lack of relocation strategy for existing traders;
- Loss of identity, diversity, vibrancy and social mix;
- Disproportionate impact on BAME community;
- Overbearing, negative impact upon conservation areas;
- Overshadowing of listed Tabernacle and Metro Central Heights;
- Defective transport arrangements which fail to integrate the tube and railway

- stations;
- Poor aesthetic features including blank facades and skyline;
- Lack of greenery;
- Roof gardens must be accessible to the public;
- Insufficient use of renewable energy;
- Insufficient consultation with the BAME community, contrary to equalities duties and regarding the existing LCC area;
- - Does not address objections raised during public consultations.

786. Southwark Group of Tenants Organisations

- Lack of social rented housing or an in lieu payment towards it;
- No provision for existing traders;
- No details of any relocation strategy;
- The area will become unaffordable and unwelcoming for ordinary Southwark citizens to live, work and shop;
- Promises over council housing and community facilities have been broken;
- Need to ensure that regeneration truly benefits local people.

787. Draper House Residents' Association

- Concerned about footpath widths on east site;
- Concerned about quality of pedestrian street between block N and W;
- Development on west site overbearing on the Elliott's Row and West Square Conservation Areas and Perronet House and Princess Street;
- No information on formal consultation / engagement with local groups during the construction works;
- Concerned about impact of long demolition and construction periods resulting in loss of provision for the community;
- Older community members use the bingo hall and no relocation proposals have been made;
- Not clear what alternatives there will be for local shops;
- Lack of low cost commercial units for existing traders, including those from the Latin American community;
- Support Latin Elephant's work to create a Latin Quarter;
- Agree with Latin Elephant and the Walworth Society that providing pedestrian crossings across New Kent Road from Elephant Road and across the Walworth Road from Elephant Road south to Eagle Yard and Draper Estate is important and would support the low line;
- Lack of social rented accommodation in the development;
- Only 40% of the affordable housing would be at London Living Rent levels;
- The tenancies would be 3 year assured shorthold;

788. Walworth Society

- Areas of publically accessible (for free) roofspace should be created to enable local people to gain from the development as widely as possible;
- Concerned that the two routes through the shopping centre site would be too narrow;
- Affordable housing viability assessment should be open to public scrutiny;
- Lack of information regarding improvement plans for the railway station. Works to it are crucial to ensure a successful transport interchange facility;
- Concerned regarding construction period, the impact this would have on

- traders, and meanwhile uses and engagement with local groups is required;
- Information required regarding ongoing support for local businesses which would be removed from the shopping centre and area surrounding it;
- Information required as to how the cultural identity of the area as a centre for Latin American culture and community would be maintained and supported;
- Unclear how the applicant will engage with the commercial future of the wider area including the north of Walworth Road;
- Trust that an assessment of the impact of the development on Walworth Road has been provided, including construction impacts;
- Need to ensure appropriate support is in place so that Walworth Road would be ready and able to be competitive when the new development is occupied;
- Arrangements should be made for groups which use the shopping centre, including older people who use the bingo, younger people who use the bowling, and the Bengali Women's group amongst a number of BME user groups;
- New crossings should be provided across New Kent Road and across Walworth Road to Eagle Yard;
- The terrace at 82-96 Walworth Road should be protected as it would be all that remains of the Piccadilly of the South;
- Recording of the Coronet and shopping centre via 3D imaging required. Note applicant's commitment to remove valuable artefacts from the Coronet for use in the new buildings
- Impact upon the Elliott's Row and West Square Conservation Areas;
- Loss of daylight and sunlight to neighbouring properties;
- The facades on the east site fronting Newington Butts and Walworth Road should be broken up to become more active in appearance;
- Inappropriate use of Corten steel for the cultural venue.

789. Hayles Street Tenants' and Residents' Association

- Impact of tall buildings upon adjoining conservation areas and listed buildings,
- Tall buildings will be viewed as a solid wall from some locations;
- Overshadowing and loss of light;
- Damaged views;
- Light pollution;
- Impact on wind microclimate;
- Contrary to Southwark tall buildings SPD, local and national planning policy and English Heritage guidance;
- Proposal will have more negative effects than positive effects;
- Some of the towers would be outside the core area for tall buildings identified in the Core Strategy.
- Misleading views from within West Square;
- Loss of privacy;
- Proposal would not meet energy requirements;
- Off-setting / payments for carbon dioxide emissions should not be accepted;
- Must allow for the needs of disabled people elderly people including more accessible car parking.

35% campaign

790. Object to the application on the grounds that:

- The affordable housing is not in accordance with policy;

- No affordable retail units are being offered;
- No relocation strategy for existing traders;
- consultation arrangements do not fulfil the Council's equalities responsibilities.
- Has been no objective assessment as to how build-to-rent meets any identified housing need or how discount market rent (DMR) meets any affordable housing need and the applicant's assessment cannot be considered objective;
- Affordable rent which includes DMR is excluded from Southwark's Core Strategy and until June 2017 from the draft NSP;
- The affordable housing offer excludes elderly people and those who are not economically active to make DMR seem more affordable, but this is contrary to equality legislation and other protected groups may be disproportionately represented in economically inactive households;
- Lack of social rented housing, contrary to adopted policy;
- Question whether affordable housing should be effectively controlled by an off-store company, established to avoid paying UK tax;
- Social rent equivalent would not be managed by a Registered Provider or the Council, contrary to the Core Strategy;
- London Living Rent is not supported by the Core Strategy;
- The proposed income bands would be contrary to the Mayor's preference that DMR unit are let at London Living Rent levels;
- No information given on the rent levels for the market units. High rent levels would significantly change the social make up of the area and not maintaining a mixed and cohesive community;
- The application should be determined in line with current, established policy. Clear reasons must be given for departing from this and none have been provided in the application;
- An earlier version of the NSP excluded affordable rent as it fails to meet housing needs in Southwark. No justification or evidence has been provided for changing the policy position and it seems the policy has been amended to suit the proposal;
- Would be premature to apply the NSP policy on DMR and it would be a significant departure from adopted policy;
- Proposal does not comply with the emerging policy on DMR owing to the rent distribution and proposed 15 year covenant;
- Exclusion of economically inactive people, unclear if this includes elderly, retired, unemployed and disabled people which raises equality issues;
- Not clear what would happen if people become economically inactive after they have rented a unit;
- Confirmation required as to whether the Council is formulating an intermediate housing list;
- Further information required regarding the possibility of GLA grant funding for the proposal. The application should not be determined until this is resolved as it would impact upon the amount and type of affordable housing;
- Tenants would be means-tested and different rents would be paid for identical flats which is inequitable;
- Means testing is objectionable as people would have to provide private financial information. Information required as to how it would be verified and who would have access to it;
- Approving this application could encourage and promote off-shore arrangements in the Build to Rent sector;
- The need for a clawback raises doubts about the housing remaining in the rented sector and the affordable housing remaining as such permanently. Unconvinced that claw-back mechanisms would be robust and effective enough;

- The executive summary for the financial viability appraisal does not comply with the Council's SPD because it gives no profit figure, no finance fees, no residual land value and aggregates construction costs, acquisition costs and professional fees;
- Publishing financial information a week before determination frustrates any meaningful public consultation. Request that it be released immediately.

791. Metropolitan Tabernacle

- Principally support the appropriate redevelopment of the site but have a number of concerns;
- Impact upon the setting of the listed Tabernacle;
- Design of the cultural venue would challenge the dominance of the Tabernacle façade including inappropriate materials, window height and potential advertising windows;
- Lack of rendered views to show the impact upon the Tabernacle;
- Scale and location of W2 tower 3 would be harmful to the setting of the Tabernacle;
- Lack of verified views to enable full impact of the Tabernacle to be assessed;
- The tower at One The Elephant is located over 40m from the Tabernacle and the design of the pavilion building is more sensitive than the proposed cultural venue;
- Lack of information regarding the impact upon the fabric of the northern elevation of the listed building;
- Support replicating the detailing on the southern flank of the Tabernacle on the north elevation following removal of the LCC building;
- Conditions for construction method statement for demolition of the LCC building and works to the north façade of the Tabernacle requested;
- Wind impact assessment does not consider day-to-day entrance and passageway to north of the Tabernacle, where people are likely to be standing, loading undertaken and which people with reduced mobility use;
- Loss of an existing car park on the LCC site which the Tabernacle use;
- Loss of 20 parking spaces in the shopping centre which the Tabernacle rents each Sunday;
- No policies in the development plan would support a loss of parking;
- Increased risk of flooding . The Tabernacle has experienced flooding in the past, which has increased in recent years possibly due to new developments ;
- Impact upon daylight and sunlight to a flat at the rear of the Tabernacle has not been considered;
- Construction impacts could affect traffic and day-to-day activities at the Tabernacle. Conditions required regarding hours of work, continuous access to the Tabernacle and control of dust and emissions;
- Safety concerns due to objects possibly falling from the balconies and terraces of tower W3;
- Noise and disturbance during construction;
- The developer should be required to have adequate insurance to deal with vibration impacts on the church;
- Flood risk and wind microclimate chapters of the ES should be updated.

792. West Square Residents' Association

- Harm to the setting of then listed Tabernacle and West Square and Elliott's Row Conservation Areas, contrary to policy 7.7A of the London Plan, local and national policies;

- Elliott's Row Conservation Area Appraisal already notes Peronet House and Prospect House (both 11-storeys) as overbearing and negative elements in the conservation area;
- The proposals for the west site contravene English Heritage guidance on tall buildings (Advice note 4);
- The proximity of tall buildings to each other will create a solid wall from many viewpoints;
- Views from West Square are misleading as they are only taken from two positions which have a row of trees blocking the view;
- Loss of daylight, sunlight and overshadowing;
- Loss of privacy;
- Light pollution;
- Would create a windy environment at street level;
- Regard must be had to the Equality Act 2010. More accessible parking would be needed.

793. Balfour Street Housing Co-Operative

- Unacceptable affordable housing offer with no social rent and no homes for sale;
- No in lieu contribution is offered towards social rented housing;
- At least 40% of the units should be let at 30% of a London living rent;
- The affordable units would be offered on 3 year tenancies, not assured tenancies with no time limit;
- Financial viability report has not been made public, contrary to the Council's policy;
- Lack of provision for existing retailers and lack of a relocation strategy;
- Question what has happened to a planned market square at the 50 New Kent Road site;
- Lack of an equalities impact assessment;
- Loss of the Coronet;
- 3D mapping of the Coronet and the shopping centre should be undertaken before demolition.
- The Council's planning policies should not be amended to suit the development;
- Terrace at 82-96 Walworth Road should be protected;
- Adverse impact upon the Elliott's Row and West Square Conservation Areas;
- Loss of daylight and sunlight.

794. Imperial War Museum

- Welcomes inward investment in the area and supports the mix of uses;
- Value the distinctive character and diverse cultural heritage of the local community and their businesses. Encourage the Council to secure measures to safeguard this;
- Footfall would increase therefore wayfinding is required, including to the museum, and this should be secured;
- Transport improvements are supported, would encourage the applicant to contribute towards public realm improvements on key routes from the transport hub including to the museum;
- A contribution towards local parks including Geraldine Mary Harmsworth Park would be strongly supported.

795. The project has a number of virtues the CAAG group felt that there were several significant flaws and we were keen to report back council in the hopes that these could be addressed:

- Blank elevations to Newington Butts and Newington Causeway. Would appear too inward facing and fail to address the high numbers of people which would pass the outside of the site;
- Limited space in front of the railway station. Should be pleasant to move through the site. Advertising could contribute to this.
- Poor relationship of cultural venue with the Tabernacle including its scale and materials;
- Funds should be dedicated to improving the overground station.
- Buildings of too large a scale;
- Impact upon wind microclimate;
- A model of the proposal should be on display during the consultation period;
- Impact upon surrounding heritage assets and strategic views;
- Insufficient lifts to serve the towers;
- West site is in an area of archaeological interest;
- Brickwork welcomed but general design repetitive and dull and west site could better distinguish different character of Oswin Street;
- Question design and function of the Peninsula;
- Unclear where market stalls would be relocated to or if they would be relocated;
- CIL and s106 money should be used to improve public areas adjacent to the site;
- Important to incorporate the present Elephant & Castle/howdah sculpture in a prominent location within the shopping centre.

796. A total of 19 representations have been received supporting the application for the following reasons:

- Would deliver much needed new housing;
- Proposals well considered and would create a unique town centre hub;
- London needs tall buildings and it makes sense to cluster them together in a central location;
- Would offer more to the area than there is at present;
- Support for housing to rent;
- New facility for LCC;
- Would deliver connected transport facilities;
- Development is about compromise and not everything would suit everyone;
- Regenerating Elephant and Castle is critical and now is the time to do it;
- Support the proposal but concerned the towers would be too high on the west site which would be very imposing and would block light and views (officer response – loss of view is not a material planning consideration and cannot be taken into account);
- Is an opportunity to reinvigorate the area and bring energy and life throughout the day;
- The link between education, commerce, retail and leisure would be beneficial to the neighbourhood;
- Area is in need of redevelopment and modernisation;
- Current shopping centre not sufficiently modern;
- Towers should be illuminated at night;
- Support the proposal but concerned about the height of W2 Tower 3 and its

impact upon the listed Tabernacle and the lower floors of new, neighbouring towers;

- The work should be brought forward and should begin sooner than 2018;
- Existing shopping centre not fit for purpose and sells substandard products;
- Will put Elephant and Castle on the map as a place to live;
- Support the provision of a local concert hall and cinema;
- Access to the Northern and Bakerloo line stations must be improved;
- Removing the thriving Latin American community and offering little social housing risks the area becoming a homogenous 'cookie-cutter' community of city workers, with few families and lack of a sense of community.

797. A total of 168 have been received objecting to the application on the following grounds.

798. Land use

- Proposal contrary to SPD29: Land uses, SPD41, SPD45 and SPD53 and does not comply with the Core Strategy and Saved Southwark Plan policies.
- Application fails to set out existing quantum of A1, A2, A3 and A4 space currently on the site and would result in a loss of leisure floorspace – this prevents proper scrutiny of the application and the application should be re-consulted on.
- The proposal favours residential uses over other uses and would fail to build upon the existing leisure offer and meet the wider town centre objectives;
- Existing traders pay well above the existing market rent;
- Lack of space for smaller entertainment venues;
- Lack of space for start-up or craft businesses;
- No affordable retail units proposed;
- No mention of the Traders' Charter within the submission which is referred to in the Elephant and Castle SPD;
- Will result in a predominance of high street chain stores;
- Lack of access to affordable goods – existing traders should be relocated before the shopping centre is closed to keep some stability for existing residents;
- Loss of the market stalls;
- Loss of leisure floorspace;
- Loss of B class floorspace;
- New shopping centre would not be large enough due to other uses proposed;
- -No relocation strategy for affected businesses;
- The existing shopping centre is well used and is a meeting place for the local community including people with mental health illnesses who may become isolated / excluded if they do not have the familiarity they are used to;
- there would be reduced range of facilities including leisure activities on the site than currently exists;
- development would be too dense but would deliver little retail space, less office space than exists on the site, and less leisure space;
- Loss of the current identity of the area which allows specialist shops and independent businesses to thrive;
- Additional background information regarding public consultation methodology used is required;
- Additional survey data gained in the evening that captures leisure users' views is required;
- Additional investigation required into the effect of redevelopment on the older population;

- Further discussion required with all businesses at risk of being displaced and a package of compensation agreed individually or collectively in advance of a decision on the application being reached;
- The centre is a meeting place for the local community, especially the bingo hall;
- too much of the area is given over to students;
- Loss of bowling alley which is suitable for all ages and allows for physical activity;
- Proposal focuses on high value retail and leisure uses and is financially motivated, and fails to take account of local needs;
- gentrification and providing a different type of retail at the site would adversely impact people on lower incomes;
- Loss of bowling facility means that people would have to travel further afield for this leisure activity;
- All-weather leisure activities for young people should be included;
- Loss of the Coronet would deprive residents of a potential theatre venue;
- Local business keep money in local communities, which would not be the case for national retailers;
- The Council should support existing traders, not use compulsory purchase powers to evict them;
- Question the need for retail units on the west site as new units nearby are unoccupied, boarded up and covered in graffiti and the area surrounded by rubbish;
- An independent retail impact assessment should be funded by the developer to assess the impact upon the local economy, including Walworth Road;
- Loss of the Coronet;
- Fails to take into account the status of the area as a focus for the Latin American community.

799. Density

- Proposal would exceed density range prescribed in the Core Strategy and the calculation does not include the non-residential floorspace.
- In spite of high density, the proposal would provide relatively little retail space and significantly less office and D2 leisure space, and only 10% of the jobs expected to be delivered in the CAZ;
- The scheme prioritises housing and policy 21 of the Elephant and Castle SPD advocates the introduction of residential *where feasible*.

800. Housing / Affordable housing

- Lack of affordable housing;
- Lack of social rented housing would be contrary to policy;
- Mix of affordable housing would not be policy compliant;
- Applicant's viability report has not been made public and the executive summary does not comply with the Council's SPD;
- Providing entirely intermediate housing would not be acceptable and would be contrary to the London Plan and emerging London Plan policy;
- Emerging London Plan policy should not hold any significant material weight as it is subject to consultation and further change;
- the affordable housing offer would include 16 studio flats which would be contrary to policy;
- Lack of family housing;
- The development should not be solely rented dwellings, it should include

- owner-occupier accommodation;
- Concerned that 35% affordable housing may not be delivered and service charges could render the accommodation unaffordable;
- Existing estates should not be demolished if no social rented housing will be delivered in their place;
- Short term tenancies would increase levels of transience in the local population, undermining a sense of community;
- Rent controls would cease after 15 years;
- HMRC found the applicant to use tax avoidance measures and the applicant is registered off-shore;
- Development within the opportunity area including consented developments in the pipeline and the application proposal would exceed the 5,000 new dwellings required under the London Plan, suggesting the lack of a plan-led approach and undermines wider objectives for the area;
- A claw-back mechanism in a s106 agreement would be required to secure an affordable housing contribution in the event that affordable homes are converted to market rent in the future;
- A mix of affordable units would be required and would need to be maintained;
- Service charges would need to be considered.

801. Design

- Loss of existing buildings which are of merit;
- Loss of one of London's oldest shopping centres;
- Loss of the Coronet which has an art deco façade and interior;
- Buildings too tall and there would not be enough space around them / not proportionate to the size of the site or of a human scale;
- Lack of a public square on the shopping centre site;
- Heights could possibly increase on shopping centre site of reduced on LCC site;
- Buildings on the LCC site should be no more than 10 storeys;
- Lack of character to the development / loss of identity;
- Would result in a group of almost uninterrupted tall buildings;
- New streets within the east site would be too narrow;
- Lack of green spaces within the wider area;
- W3 tower 2 was not shown in documents for pre-application exhibition;
- Unacceptable impact upon listed buildings and conservation areas;
- Impact upon protected viewing corridor;
- Gentrification will alter the character of the historic area and everywhere looks the same;
- the outside appearance of the shopping centre could be improved and it could be renovated internally;
- Blank facades to a number of buildings on the west site.
- Adverse impact upon the Elliott's Row and West Square Conservation Areas;
- Would create a skyline of almost uninterrupted tall buildings which would be overbearing;
- Elliott's Row Conservation Area Appraisal notes Peronet House and Prospect House as overbearing and proposal would add to this.
- Area already blighted by tall buildings;
- Council rejected 1,000 flats on the shopping centre but now 979 are proposed.
- Unimaginative design with no architectural merit;
- The building would unacceptably screen 1 The Elephant and would prevent its architecture from standing out;
- Design of cultural venue, including advertising panels and materials would be

- out of keeping with the surrounding area;
- Lack of public space at the top of the tall buildings, contrary to policy;
- A s106 agreement should require relocation of the Faraday Memorial to create additional open space;
- Understood that the existing LCC building is listed – officer response – it is not a listed building;
- The LCC building was extended less than 20 years ago. Question whether the proposal is another example of short-termism;
- Concerned that the quality of the buildings would be reduced if permission is granted;
- LCC building looks like a speculative office development – the existing building is better quality;
- The east site would have a small, windy and overshadowed space at the centre, not a new town square;
- Demolition of the Coronet would diminish the cultural and architectural heritage of the area;
- Lack of green spaces within the development;
- Past proposals to build close to Strata were rejected by the Council;
- Stark increases in building heights with inadequate tapering;
- Streetlighting on Oswin Street should be upgraded.

802. Quality of accommodation

- no reference in the submission to Lifetime Homes standards, contrary to saved policy 4.2 of the Southwark Plan;
- Lack of public and private amenity space including childrens' playspace;
- Units would not comply with the minimum internal space standards in the Council's Residential Design Standards SPD.

803. Amenity

- Proposal contrary to saved policy 3.2 of the Southwark Plan and the Council's Residential Design Standards SPD;
- Noise, dust and dirt during construction;
- Impact upon access in and around the area during construction, including for disabled people;
- General noise and disturbance, including from proposed location of servicing access;
- increased pollution;
- Light pollution from towers at night;
- Increased noise pollution;
- Air quality is poor in the area;
- Loss of daylight, sunlight and overshadowing (including to Lamplash Street and the allotments and lower floors of Strata which are social housing);
- Loss of view (officer response – this is not a material planning consideration and cannot be taken into account);
- Loss of privacy, from towers and proposed shared gardens;
- Would result in a narrow alleyway next to the Tabernacle which could result in a poor and potentially unsafe environment for pedestrians, particularly at night.
- Overbearing impact / loss of outlook;
- Tower on west site should be no higher than existing LCC building and plot W2 tower 3 should be removed to ensure no adverse impact upon existing buildings;
- Increased crime, including from new alleyway which would be created next to

the Tabernacle;

- Gusts of wind near Strata at present, and this issue is likely to increase;
- Request that copies of any asbestos surveys and any site investigations undertaken be made available – officer response – these have not yet been undertaken and would be subject to conditions. Documents submitted in order to discharge planning conditions are publically available on the Council's website;
- Noise and disturbance from servicing activities on Oswin Street, people using balconies , pocket parks and the cultural venue;
- Lack of public toilets;
- All open space within the development should be fully, publically accessible;
- Question whether rights to light have been considered and if not, request a study – officer response – rights to light are not a material planning consideration and cannot be taken into account;
- The existing shopping centre is being neglected;
- Will undermine the confidence of families wanting to buy in the area by setting a precedent for tall buildings being constructed close to existing buildings;

804. Transport

- Increased traffic and traffic delays;
- Area already crowded, no consideration of crowd control;
- Oswin Street already used as a service road for Elephant and Castle and by construction vehicles;
- Oswin Street should be made one-way;
- Insufficient provision for deliveries to the new dwellings;
- The tube station is already at capacity;
- Not clear if improvements are proposed to the tube station;
- Already high levels of traffic on Brook Drive;
- Impact on public transport / overcrowding;
- Impact upon highway safety including residents, school parties and cyclists;
- The development should not be accessed via narrow, existing residential roads, including construction traffic;
- Traffic, congestion and pollution have increased since changes to the highway network were implemented and these problems would worsen;
- Lack of vehicular access to the Tabernacle during construction;
- Loss of parking for people using the Tabernacle;
- Safety of children using the Tabernacle for Sunday school;
- The applicant should support the redevelopment of the railway station;
- The proposal would not deliver step-free access to the railway station;
- Increased traffic including from servicing vehicles along Elephant Road would be harmful to amenity and pedestrian safety;
- Lack of information regarding the agreed sum for the northern line ticket hall and a potential funding gap which could impact upon viability. A Grampian condition would be required to ensure that the ticket hall is delivered;
- Question whether the work would take place at the same time as the Bakerloo Line extension;
- Does not take into account the extra capacity requirements which would arise from the Bakerloo Line extension;
- Waste management facilities should be discrete.

805. Infrastructure / facilities

- Infrastructure not sufficient to cope with the additional residents;

- Impact on local services such as GP surgeries, hospitals and schools;

806. Sustainability

- Scale and prominence of proposal such that it should exceed sustainability / environmental policies, not simply comply with them;
- Failure to meet energy requirements;
- Impact upon climate change and sea levels should be considered;
- All existing trees on the LCC site should be retained;
- Impact upon flora and fauna in West Square and its gardens as a result of overshadowing.

807. Equalities

- Consultation arrangements do not fulfil the Council's equalities responsibilities;
- Loss of the bingo hall would have a disproportionate impact upon older people and age is a protected characteristic under the Equalities Act (2010);
- Additional surveying required during the evenings that captures leisure users' views;
- Proposal would have a disproportionate impact upon people from BAME backgrounds and no affordable retail space or relocation strategy is proposed;
- The Council's 9th May Cabinet Report has not given full regard to the impact of the closure of the bingo hall on groups with protected characteristics or on the wider community as it refers to the applicant agreeing a way forward with the bingo hall owner but no meaningful discussions have taken place;
- The loss of the bingo would have a significant effect on patrons and the wider community who rely on it for socialising;
- The Cabinet report does not propose any mitigation for the loss of the bingo;
- A strategy for relocation and compensation must be in place in a timely manner to ensure continued trading and certainty for traders and residents before permission is granted;
- Contrary to the NPPF;
- No equalities surveying of the bowling has been undertaken;

808. Socio-economics

- ES fails to justify the loss of leisure, retail and commercial floorspace through the necessary sequential test and how the considerations have positively influenced the scheme;
- Insufficient comparison is made between the existing and proposed economic mix and business types given that application does not distinguish between A and B1 use;
- Demolition and construction impacts not adequately assessed given absence of relocation strategy;

809. Fire safety

- Tower blocks over 10 storeys with only one staircase are dangerous and raise difficulties in containing fires and evacuating residents;
- The Planning Committee must satisfy itself that all of the tall buildings proposed would be safe, including in its design and use of materials;
- Fire safety is too important an issue to be left to the inadequate building regulations regime.
- More tower blocks are not safe or desirable in the wake of the Grenfell Tower

disaster;

810. Other matters

- Lack of consultation, and no documents were produced in Spanish;
- Lack of information about how the applicant will maintain and sustain the shopping centre until closure;
- The towers on the LCC site did not form part of the pre-application consultation;
- None of the concerns raised during pre-application consultation have been addressed;
- Consultation carried out over Christmas;
- The existing shopping centre is difficult for people with disabilities to access;
- Consultations on planning application sent out over Christmas when people are likely to be away;
- One the Elephant should be visited so that the impact can be assessed ;
- Additional information required regarding public consultation methodology used;
- Consultation letters not sent to 1 Gabriel Walk (One the Elephant) – officer response – additional notification letters were subsequently sent;
- Impact upon property values – officer response – this is not a material planning consideration and cannot be taken into account;
- The site address for the planning application only refers to the shopping centre and the LCC building, and it does not include the Coronet and other buildings separate to the shopping centre. Re-consultation should therefore be undertaken to clarify this – officer response – in agreement with the applicant the address has been changed to include these properties. The plans and documents for the application clearly show all of the land to which the application relates;
- A former Southwark Councillor is now employed by the applicant and working on the application;
- Aylesbury Estate CPO was refused by the Secretary of State;
- Despite a formal request, the Council's pre-application advice has not been posted online and this is required to understand how the scheme has evolved including inclusion of the LCC site – officer response – the Council's procedure is to send the pre-application advice to those who have requested it, was is the case in this instance;
- No copy of the Planning Performance Agreement (PPA) with the Council has been posted online – officer response – it is not the Council's procedure to post PPAs online or to make them available to third parties;
- Is a money making opportunity for LCC;
- The applicant uses off-shore shell companies to avoid paying tax – the Council should not make policy concessions to support developers who do not pay tax.

811. Representations have been received from 10 properties commenting on the application as follows:

- Question whether St George's Buildings would be affected by the proposal;
- Question the duration of the construction works;
- Construction impacts;
- Loss of light and overshadowing;
- Lack of parking;
- Lack of consideration of additional community facilities needed to support additional residents;

Re-consultation

812. Notification letters were sent to all of the same properties and consultees notified of the original application together with people / groups not originally notified but who commented on the application. New site notices were displayed and the proposal was advertised in the press. All gave a 28 day period for comment.

813. A further 90 representations were received following re-consultation objecting to the application. New issues raised are:

- Additional images submitted of the Tabernacle demonstrate the harm which would be caused to its setting;
- Revised / additional information not available on the Council's website when the re-consultation started ;
- No further information has been submitted addressing impact upon light to properties on Oswin Street;
- The mansion block should be set back and reduced in size;
- Landscape improvements should be made along Oswin Street including new planting and granite paving;
- Amendments do not address original concerns raised;
- There should be revised separation distance guidelines to protect privacy, views and outlook for tall buildings;
- The wind tunnel testing should be independently verified, as wind tunnels could result in injuries, deaths and expensive lawsuits;
- Re-consultation took place over August when people are on holiday (officer response – the consultation period was extended from 21 to 28 days, and representations may be received and taken into account after the consultation period has ended);
- Other developments in the area have not been well managed by the Council and developers have been able to pursue their interest, contrary to planning policies;
- The draft local business support and relocation strategy is not suitable for operator of the bingo hall and bowling alley and they are unlikely to quality for support;
- Equality issues relating to the loss of the bingo hall and bowling alley have not been addressed and deferring this to a s106 agreement would not give the Council a full opportunity to consider the impacts;
- Affordable housing proposal remains unacceptable;
- Plans must be put in place to ensure that none of the proposed flats are allowed to remain vacant;
- Intimidation by managing agents of the shopping centre;
- The draft local business support and relocation strategy fails to address equalities issues and has not been prepared in consultation with traders; does not give prioritised return for existing traders and disregards their desire to cluster;
- Would fail to deliver a fully integrated transport system;
- The application should not be considered, given how unacceptable it is;
- When permission was granted to turn open space at the LCC site to parking, assurances were given that the open nature of the space would be preserved;
- Impact upon sewers;
- Neighbouring developments are poorly serviced;
- Impact of servicing upon Oswin Street;
- Proposal does not address that overshadowing and loss of light would require additional heating to neighbouring buildings.

814. A further 5 representations were received in support of the application following re-consultation.

- The development should proceed, for the benefit of all of the community, not just ethnic minorities;
- The Tabernacle is already surrounded by tall buildings;
- The existing shopping centre spoils the new housing being developed around it;
- Should consider the needs of people moving into the area;
- People living in the area have to travel out of the area to find suitable social activities.

815. A further 2 representations commenting on the application were received following re-consultation, raising the following new issues:

- Building heights on the west site should be reduced, but could be increased on the east site if required for viability reasons;
- Cautiously optimistic about the Draft Local Business Support and Relocation Strategy which includes affordable retail space, but it should be increased to 10%;
- The Council should be especially alert to ensuring that the affordable retail obligations are delivered.

816. On 14th November the Council sent a letter to Tree Shepherd and Latin Elephant setting out the applicant's updated offer in respect of Tree Shepherd support for all businesses within the red line, the relocation fund and off-site affordable retail space contributions. Tree Shepherd and Latin Elephant disseminated this information to the traders which they represent (all within the red line in the case of Tree Shepherd), and gave an additional 14 days to make any comments.

Responses received

817. An objection has been received from Latin Elephant raising the following concerns.

- The offer by the developer has not been formulated in consultation with the traders and local organisations – they should be involved in formulating the relocation strategy and subsequently have input into the s106 agreement;
- Separate fund require for loss of trade during relocation period;
- Still no clarity over the timing of the relocation strategy;
- Question how the off-site affordable retail contribution has been calculated;
- Object to the discretionary use of the fund. Allocation criteria is required which traders should be involved in;
- Relocation fund could end up all being spent on surveyors and solicitors;
- Concerned that the relocation fund would be used to create retail space at Perronet House, with nothing left for displacement costs;
- Perronet garages not large enough to accommodate all independent businesses affected;
- Concerns over suitability of Perronet garages for retail and model of proposal not shown to traders;
- Concerns regarding the suitability of Arch Street for retail space;
- Lack of opportunities to cluster;
- Lack of information as to when the affordable retail units at Elephant One would be available, the rent levels and eligibility criteria;
- Is still no list of available units in the area;
- No commitment to existing traders having priority for the on-site affordable retail;
- Lack of information regarding a potential CPO;
- Additional Tree Shepherd support has not been adequately conveyed.

818. A 27 signature petition has been received objecting to the application on the following grounds:

- Traders not given enough time to analyse the applicant's updated offer;
- BAME, independent traders want to be involved in drafting the relocation strategy and have been left out;
- Updated proposal still vague;
- Amounts for the relocation fund and provision of affordable retail units are not sufficient and question how they have been calculated and criteria behind it;
- Question why the Council has not insisted on 10% on-site affordable retail;
- Relocation fund should be tripled, with £100k per unit;
- Question why relocation fund would be discretionary / criteria for allocation / who gets what / should be a transparent process;
- Question whether business size and length of trading in the shopping centre would be considered;
- Relocation fund should not be destined for Council commissioned professionals (surveyors etc); traders should have freedom of choice;
- Question if the relocation fund would be used to convert Perronett House garages to retail space;
- Updated proposal does not specify how much of the money would go to Tree Shepherd;
- Question when list of available units would be published;
- Traders have not been shown Arch Street proposals and question its suitability;
- No reference to units in Elephant One including when they would be available and criteria for renting a unit;
- Question suitability of Perronet House for retail – traders have not seen full details;
- No commitment to guaranteed right to return to the site;
- Council Officers confirmed that negotiations would be in line with the 'Business Continuity Charter' but are now advised that it was an aspiration which was never taken forward;
- Concerned that the Council has written to traders requiring information for a potential CPO, but there is no agreed relocation strategy yet.

819. A further 8 representations have been received following this most recent round of consultation objecting to the application on the following grounds:

- Relocation strategy focusses on retail only and does not address the needs of the existing leisure operators;
- Parking is required for the shopping centre, particularly for older people.

Human rights implications

820. 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.

821. This application has the legitimate aim of providing a comprehensive mixed-use development on the 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/1512-Q Application file: 16/AP/4458 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 5410 Council website: www.southwark.gov.uk |

APPENDICES

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

AUDIT TRAIL

| | | | |
|--|--|-------------------|--|
| Lead Officer | Simon Bevan Director of Planning | | |
| Report Author | Victoria Lewis / Michael Glasgow, Team Leaders | | |
| Version | Final | | |
| Dated | 30 November 2017 | | |
| Key Decision | No | | |
| CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER | | | |
| Officer Title | Comments Sought | Comments included | |
| Strategic Director of Finance and Governance | No | No | |
| Strategic Director of Environment and Social Regeneration | No | No | |
| Strategic Director of Housing and Modernisation | No | No | |
| Director of Regeneration | No | No | |
| Date final report sent to Constitutional Team | | 07 December 2017 | |

APPENDIX 1

Consultation undertaken

Site notice date: 20/01/2017

Press notice date: 15/12/2016

Case officer site visit date: n/a

Neighbour consultation letters sent: 20/12/2016

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

Arqiva - digital communications
City Of London
City of Westminster
Civil Aviation Authority
Council for British Archaeology
EDF Energy
Environment Agency
Greater London Authority
Health & Safety Executive
Historic England
London Borough of Bromley
London Borough of Croydon
London Borough of Haringey
London Borough of Islington
London Borough of Lambeth
London Borough of Lewisham
London Fire & Emergency Planning Authority
London Overground
London Underground Limited
Metropolitan Police Service (Designing out Crime)
National Grid UK Transmission
National Planning Casework Unit
Natural England - London Region & South East Region

Network Rail (Planning)
 Thames Water - Development Planning
 The Georgian Group
 The Royal Parks
 The Theatres Trust
 The Victorian Society
 Transport for London (referable & non-referable app notifications and pre-apps)
 Twentieth Century Society

Neighbour and local groups consulted:

| | |
|--|--|
| 123 Brook Drive London SE11 4TQ | Flat 403 Highline Building SE17 3AF |
| 127 Brook Drive London SE11 4TQ | Flat 304 Highline Building SE17 3AF |
| 119 Brook Drive London SE11 4TQ | Flat 302 Highline Building SE17 3AF |
| 121 Brook Drive London SE11 4TQ | Flat 303 Highline Building SE17 3AF |
| 135 Brook Drive London SE11 4TQ | Flat 404 Highline Building SE17 3AF |
| 149 Brook Drive London SE11 4TQ | Flat 602 Highline Building SE17 3AF |
| 133 Brook Drive London SE11 4TQ | Flat 603 Highline Building SE17 3AF |
| 181 Brook Drive London SE11 4TG | Flat 601 Highline Building SE17 3AF |
| 183 Brook Drive London SE11 4TG | Flat 502 Highline Building SE17 3AF |
| 171 Brook Drive London SE11 4TG | Flat 503 Highline Building SE17 3AF |
| 179 Brook Drive London SE11 4TG | Arch 145 Eagle Yard SE1 6SP |
| 185 Brook Drive London SE11 4TG | Unit 1 Draper House SE1 6SX |
| 101 Brook Drive London SE11 4TU | Unit 2 Draper House SE1 6SX |
| 6 Harmsworth Mews London SE11 4SQ | Flat 1 189 Brook Drive SE11 4TG |
| 7 Harmsworth Mews London SE11 4SQ | Flat 2 189 Brook Drive SE11 4TG |
| 4 Harmsworth Mews London SE11 4SQ | Management Office 8 Walworth Road SE1 6EE |
| 5 Harmsworth Mews London SE11 4SQ | Studio 2 86 Walworth Road SE1 6SW |
| Flat A 13 Austral Street SE11 4SJ | Unit 3 Draper House SE1 6SX |
| Flat B 11 Austral Street SE11 4SJ | Unit 7 91-95 Newington Butts SE1 6SF |
| Basement Flat 28 West Square SE11 4SP | Unit 8 91-95 Newington Butts SE1 6SF |
| Flat A 11 Austral Street SE11 4SJ | Unit 6 91-95 Newington Butts SE1 6SF |
| 91 Brook Drive London SE11 4TU | Unit 4 91-95 Newington Butts SE1 6SF |
| 2 Harmsworth Mews London SE11 4SQ | Unit 5 91-95 Newington Butts SE1 6SF |
| 3 Harmsworth Mews London SE11 4SQ | Unit 9 91-95 Newington Butts SE1 6SF |
| 1 Harmsworth Mews London SE11 4SQ | Arch 142 Eagle Yard SE1 6SP |
| 13 Oswin Street London SE11 4TF | Arch 143 Eagle Yard SE1 6SP |
| 15 Oswin Street London SE11 4TF | Arch 141 Eagle Yard SE1 6SP |
| 29 Oswin Street London SE11 4TF | Unit 10 91-95 Newington Butts SE1 6SF |
| 62 Elliott's Row London SE11 4SZ | Arch 140 Eagle Yard SE1 6SP |
| 60 Elliott's Row London SE11 4SZ | Unit 3 91-95 Newington Butts SE1 6SF |
| 61 Elliott's Row London SE11 4SZ | First Floor Flat 4 Hampton Street SE1 6SN |
| 68 Elliott's Row London SE11 4SZ | Second Floor Flat 4 Hampton Street SE1 6SN |
| 64 Elliott's Row London SE11 4SZ | Unit 6 Draper House SE1 6SX |
| 67 Elliott's Row London SE11 4SZ | Unit 4 Draper House SE1 6SX |
| 155 Brook Drive London SE11 4TG | Unit 5 Draper House SE1 6SX |
| 157 Brook Drive London SE11 4TG | Unit 1 91-95 Newington Butts SE1 6SF |
| 151 Brook Drive London SE11 4TG | Unit 2 91-95 Newington Butts SE1 6SF |
| 153 Brook Drive London SE11 4TG | 47 Dante Road London SE11 4RB |
| 167 Brook Drive London SE11 4TG | Site Huts 20 Steedman Street SE17 3AF |
| 169 Brook Drive London SE11 4TG | Apartment 707 1 St Gabriel Walk SE1 6FA |
| 159 Brook Drive London SE11 4TG | Apartment 708 1 St Gabriel Walk SE1 6FA |
| 163 Brook Drive London SE11 4TG | Apartment 706 1 St Gabriel Walk SE1 6FA |
| 39 Oswin Street London SE11 4TF | Apartment 704 1 St Gabriel Walk SE1 6FA |
| 41 Oswin Street London SE11 4TF | Apartment 705 1 St Gabriel Walk SE1 6FA |
| 31 Oswin Street London SE11 4TF | Apartment 801 1 St Gabriel Walk SE1 6FA |
| 7 Oswin Street London SE11 4TF | Apartment 805 1 St Gabriel Walk SE1 6FA |
| 9 Oswin Street London SE11 4TF | Apartment 806 1 St Gabriel Walk SE1 6FA |
| 43 Oswin Street London SE11 4TF | Apartment 804 1 St Gabriel Walk SE1 6FA |
| Flat B 13 Austral Street SE11 4SJ | Apartment 802 1 St Gabriel Walk SE1 6FA |
| 34 Hayles Buildings Elliott's Row SE11 4TB | Apartment 803 1 St Gabriel Walk SE1 6FA |
| 35 Hayles Buildings Elliott's Row SE11 4TB | Apartment 703 1 St Gabriel Walk SE1 6FA |
| 32 Hayles Buildings Elliott's Row SE11 4TB | Apartment 603 1 St Gabriel Walk SE1 6FA |
| 33 Hayles Buildings Elliott's Row SE11 4TB | Apartment 604 1 St Gabriel Walk SE1 6FA |
| 38 Hayles Buildings Elliott's Row SE11 4TB | Apartment 602 1 St Gabriel Walk SE1 6FA |
| 39 Hayles Buildings Elliott's Row SE11 4TB | Apartment 508 1 St Gabriel Walk SE1 6FA |
| 36 Hayles Buildings Elliott's Row SE11 4TB | Apartment 601 1 St Gabriel Walk SE1 6FA |
| 37 Hayles Buildings Elliott's Row SE11 4TB | Apartment 605 1 St Gabriel Walk SE1 6FA |
| 26 Hayles Buildings Elliott's Row SE11 4TB | Apartment 701 1 St Gabriel Walk SE1 6FA |
| 27 Hayles Buildings Elliott's Row SE11 4TB | Apartment 702 1 St Gabriel Walk SE1 6FA |

24 Hayles Buildings Elliott's Row SE11 4TB
 25 Hayles Buildings Elliott's Row SE11 4TB
 30 Hayles Buildings Elliott's Row SE11 4TB
 31 Hayles Buildings Elliott's Row SE11 4TB
 28 Hayles Buildings Elliott's Row SE11 4TB
 29 Hayles Buildings Elliott's Row SE11 4TB
 40 Hayles Buildings Elliott's Row SE11 4TB
 51 Hayles Buildings Elliott's Row SE11 4TD
 52 Hayles Buildings Elliott's Row SE11 4TD
 49 Hayles Buildings Elliott's Row SE11 4TD
 50 Hayles Buildings Elliott's Row SE11 4TD
 55 Hayles Buildings Elliott's Row SE11 4TD
 56 Hayles Buildings Elliott's Row SE11 4TD
 53 Hayles Buildings Elliott's Row SE11 4TD
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 46 Hayles Buildings Elliott's Row SE11 4TD
 1 Hayles Buildings Elliott's Row SE11 4TA
 10 Hayles Buildings Elliott's Row SE11 4TA
 7a Hayles Street London SE11 4SU
 32a Elliott's Row London SE11 4SZ
 13 Hayles Buildings Elliott's Row SE11 4TA
 14 Hayles Buildings Elliott's Row SE11 4TA
 11 Hayles Buildings Elliott's Row SE11 4TA
 12 Hayles Buildings Elliott's Row SE11 4TA
 Flat 1 5 Austral Street SE11 4SJ
 Flat 2 5 Austral Street SE11 4SJ
 Flat C 11 Austral Street SE11 4SJ
 Flat C 13 Austral Street SE11 4SJ
 11b West Square London SE11 4SN
 11c West Square London SE11 4SN
 Flat 3 5 Austral Street SE11 4SJ
 11a West Square London SE11 4SN
 15 Hayles Buildings Elliott's Row SE11 4TA
 7 Hayles Buildings Elliott's Row SE11 4TA
 8 Hayles Buildings Elliott's Row SE11 4TA
 5 Hayles Buildings Elliott's Row SE11 4TA
 6 Hayles Buildings Elliott's Row SE11 4TA
 22 Hayles Buildings Elliott's Row SE11 4TB
 23 Hayles Buildings Elliott's Row SE11 4TB
 9 Hayles Buildings Elliott's Row SE11 4TA
 21 Hayles Buildings Elliott's Row SE11 4TB
 18 Hayles Buildings Elliott's Row SE11 4TA
 19 Hayles Buildings Elliott's Row SE11 4TA
 16 Hayles Buildings Elliott's Row SE11 4TA
 17 Hayles Buildings Elliott's Row SE11 4TA
 3 Hayles Buildings Elliott's Row SE11 4TA
 4 Hayles Buildings Elliott's Row SE11 4TA
 2 Hayles Buildings Elliott's Row SE11 4TA
 20 Hayles Buildings Elliott's Row SE11 4TA
 16 Hayles Street London SE11 4SS
 18 Hayles Street London SE11 4SS
 12 Hayles Street London SE11 4SS
 14 Hayles Street London SE11 4SS
 24 Hayles Street London SE11 4SS
 2 Hayles Street London SE11 4SS
 20 Hayles Street London SE11 4SS
 1 Orient Street London SE11 4SR
 15 Orient Street London SE11 4SR
 52 West Square London SE11 4SP
 53 West Square London SE11 4SP
 7 Orient Street London SE11 4SR
 10 Hayles Street London SE11 4SS
 3 Orient Street London SE11 4SR
 5 Orient Street London SE11 4SR
 26 Hayles Street London SE11 4SS
 17 Hayles Street London SE11 4SU
 19 Hayles Street London SE11 4SU

Apartment 608 1 St Gabriel Walk SE1 6FA
 Apartment 606 1 St Gabriel Walk SE1 6FA
 Apartment 607 1 St Gabriel Walk SE1 6FA
 Apartment 807 1 St Gabriel Walk SE1 6FA
 Apartment 1007 1 St Gabriel Walk SE1 6FB
 Apartment 1008 1 St Gabriel Walk SE1 6FB
 Apartment 1006 1 St Gabriel Walk SE1 6FB
 Apartment 1004 1 St Gabriel Walk SE1 6FB
 Apartment 1005 1 St Gabriel Walk SE1 6FB
 Apartment 1101 1 St Gabriel Walk SE1 6FB
 Apartment 1105 1 St Gabriel Walk SE1 6FB
 Apartment 1106 1 St Gabriel Walk SE1 6FB
 Apartment 1104 1 St Gabriel Walk SE1 6FB
 Apartment 1102 1 St Gabriel Walk SE1 6FB
 Apartment 1103 1 St Gabriel Walk SE1 6FB
 Apartment 1003 1 St Gabriel Walk SE1 6FB
 Apartment 903 1 St Gabriel Walk SE1 6FA
 Apartment 904 1 St Gabriel Walk SE1 6FA
 Apartment 902 1 St Gabriel Walk SE1 6FA
 Apartment 808 1 St Gabriel Walk SE1 6FA
 Apartment 901 1 St Gabriel Walk SE1 6FA
 Apartment 905 1 St Gabriel Walk SE1 6FA
 Apartment 1001 1 St Gabriel Walk SE1 6FB
 Apartment 1002 1 St Gabriel Walk SE1 6FB
 Apartment 908 1 St Gabriel Walk SE1 6FB
 Apartment 906 1 St Gabriel Walk SE1 6FA
 Apartment 907 1 St Gabriel Walk SE1 6FA
 Apartment 507 1 St Gabriel Walk SE1 6FA
 Apartment 103 1 St Gabriel Walk SE1 6FA
 Apartment 104 1 St Gabriel Walk SE1 6FA
 Apartment 102 1 St Gabriel Walk SE1 6FA
 1 St Gabriel Walk London SE1 6FB
 Apartment 101 1 St Gabriel Walk SE1 6FA
 Apartment 105 1 St Gabriel Walk SE1 6FA
 Apartment 204 1 St Gabriel Walk SE1 6FA
 Apartment 205 1 St Gabriel Walk SE1 6FA
 Apartment 203 1 St Gabriel Walk SE1 6FA
 Apartment 201 1 St Gabriel Walk SE1 6FA
 Apartment 202 1 St Gabriel Walk SE1 6FA
 Castle Centre 2 St Gabriel Walk SE1 6FG
 16 Steedman Street London SE17 3AF
 1 Randall Court 14 Steedman Street SE17 3AF
 Randall Court 14 Steedman Street SE17 3AF
 7 Hampton Street London SE17 3AF
 12 Steedman Street London SE17 3AF
 2 Randall Court 14 Steedman Street SE17 3AF
 6 Randall Court 14 Steedman Street SE17 3AF
 7 Randall Court 14 Steedman Street SE17 3AF
 5 Randall Court 14 Steedman Street SE17 3AF
 3 Randall Court 14 Steedman Street SE17 3AF
 4 Randall Court 14 Steedman Street SE17 3AF
 Apartment 206 1 St Gabriel Walk SE1 6FA
 Apartment 407 1 St Gabriel Walk SE1 6FA
 Apartment 408 1 St Gabriel Walk SE1 6FA
 Apartment 406 1 St Gabriel Walk SE1 6FA
 Apartment 404 1 St Gabriel Walk SE1 6FA
 Apartment 405 1 St Gabriel Walk SE1 6FA
 Apartment 501 1 St Gabriel Walk SE1 6FA
 Apartment 505 1 St Gabriel Walk SE1 6FA
 Apartment 506 1 St Gabriel Walk SE1 6FA
 Apartment 504 1 St Gabriel Walk SE1 6FA
 Apartment 502 1 St Gabriel Walk SE1 6FA
 Apartment 503 1 St Gabriel Walk SE1 6FA
 Apartment 403 1 St Gabriel Walk SE1 6FA
 Apartment 302 1 St Gabriel Walk SE1 6FA
 Apartment 303 1 St Gabriel Walk SE1 6FA
 Apartment 301 1 St Gabriel Walk SE1 6FA
 Apartment 207 1 St Gabriel Walk SE1 6FA
 Apartment 208 1 St Gabriel Walk SE1 6FA
 Apartment 304 1 St Gabriel Walk SE1 6FA
 Apartment 401 1 St Gabriel Walk SE1 6FA
 Apartment 402 1 St Gabriel Walk SE1 6FA
 Apartment 307 1 St Gabriel Walk SE1 6FA
 Apartment 305 1 St Gabriel Walk SE1 6FA

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|---|---|
| 57 Hayles Street London SE11 4SU | Apartment 2701 8 Walworth Road SE1 6EH |
| 51 Hayles Street London SE11 4SU | Apartment 2610 8 Walworth Road SE1 6EH |
| 53 Hayles Street London SE11 4SU | Apartment 2608 8 Walworth Road SE1 6EH |
| 33 Hayles Street London SE11 4SU | Apartment 2609 8 Walworth Road SE1 6EH |
| 35 Hayles Street London SE11 4SU | Apartment 2702 8 Walworth Road SE1 6EH |
| 3 Hayles Street London SE11 4SU | Apartment 2706 8 Walworth Road SE1 6EH |
| 31 Hayles Street London SE11 4SU | Apartment 2707 8 Walworth Road SE1 6EH |
| 41 Hayles Street London SE11 4SU | Apartment 2705 8 Walworth Road SE1 6EH |
| 43 Hayles Street London SE11 4SU | Apartment 2703 8 Walworth Road SE1 6EH |
| 37 Hayles Street London SE11 4SU | Apartment 2704 8 Walworth Road SE1 6EH |
| 39 Hayles Street London SE11 4SU | Apartment 2607 8 Walworth Road SE1 6EH |
| 59 Hayles Street London SE11 4SU | Apartment 2510 8 Walworth Road SE1 6EH |
| 52 Hayles Street London SE11 4SX | Apartment 2511 8 Walworth Road SE1 6EH |
| 54 Hayles Street London SE11 4SX | Apartment 2509 8 Walworth Road SE1 6EH |
| 48 Hayles Street London SE11 4SX | Apartment 2507 8 Walworth Road SE1 6EH |
| 50 Hayles Street London SE11 4SX | Apartment 2508 8 Walworth Road SE1 6EH |
| 60 Hayles Street London SE11 4SX | Apartment 2601 8 Walworth Road SE1 6EH |
| 62 Hayles Street London SE11 4SX | Apartment 2605 8 Walworth Road SE1 6EH |
| 56 Hayles Street London SE11 4SX | Apartment 2606 8 Walworth Road SE1 6EH |
| 58 Hayles Street London SE11 4SX | Apartment 2604 8 Walworth Road SE1 6EH |
| 38 Hayles Street London SE11 4SX | Apartment 2602 8 Walworth Road SE1 6EH |
| 61 Hayles Street London SE11 4SU | Apartment 2603 8 Walworth Road SE1 6EH |
| 44 Hayles Street London SE11 4SX | Apartment 3808 8 Walworth Road SE1 6EL |
| 46 Hayles Street London SE11 4SX | Apartment 3901 8 Walworth Road SE1 6EL |
| 40 Hayles Street London SE11 4SX | Apartment 3807 8 Walworth Road SE1 6EL |
| 42 Hayles Street London SE11 4SX | Apartment 3805 8 Walworth Road SE1 6EL |
| 57 Hayles Buildings Elliott's Row SE11 4TD | Apartment 3806 8 Walworth Road SE1 6EL |
| 35 Oswin Street London SE11 4TF | Apartment 3902 8 Walworth Road SE1 6EL |
| 6a Austral Street London SE11 4SJ | Apartment 4001 8 Walworth Road SE1 6EL |
| 141b Brook Drive London SE11 4TQ | Apartment 4002 8 Walworth Road SE1 6EL |
| Flat 3 95 Brook Drive SE11 4TU | Apartment 3905 8 Walworth Road SE1 6EL |
| Ground Flat 97 Brook Drive SE11 4TU | Apartment 3903 8 Walworth Road SE1 6EL |
| 93 Brook Drive London SE11 4TU | Apartment 3904 8 Walworth Road SE1 6EL |
| Flat 2 95 Brook Drive SE11 4TU | Apartment 3804 8 Walworth Road SE1 6EL |
| 21a Austral Street London SE11 4SJ | Apartment 3705 8 Walworth Road SE1 6EL |
| 21b Austral Street London SE11 4SJ | Apartment 3706 8 Walworth Road SE1 6EL |
| 13 West Square London SE11 4SN | Apartment 3704 8 Walworth Road SE1 6EL |
| 17 West Square London SE11 4SN | Apartment 3702 8 Walworth Road SE1 6EL |
| 129b Brook Drive London SE11 4TQ | Apartment 3703 8 Walworth Road SE1 6EL |
| 141a Brook Drive London SE11 4TQ | Apartment 3707 8 Walworth Road SE1 6EL |
| 165a Brook Drive London SE11 4TG | Apartment 3802 8 Walworth Road SE1 6EL |
| 129a Brook Drive London SE11 4TQ | Apartment 3803 8 Walworth Road SE1 6EL |
| First Floor Flat 97 Brook Drive SE11 4TU | Apartment 3801 8 Walworth Road SE1 6EL |
| Middle Floor Flat 25 Oswin Street SE11 4TF | Apartment 3708 8 Walworth Road SE1 6EL |
| First Floor Flat 28 West Square SE11 4SP | Apartment 3709 8 Walworth Road SE1 6EL |
| First Floor Flat 15 Austral Street SE11 4SJ | Apartment 4003 8 Walworth Road SE1 6EL |
| First Floor Flat Southwark Citadel SE1 6HH | Apartment 1511 8 Walworth Road SE1 6EG |
| 27 Oswin Street London SE11 4TF | Flat 2 183 Brook Drive SE11 4TG |
| Flat 2 5 Oswin Street SE11 4TF | Flat 3 183 Brook Drive SE11 4TG |
| First Floor Flat 9 Austral Street SE11 4SJ | Flat 1 183 Brook Drive SE11 4TG |
| Flat 1 3-5 Oswin Street SE11 4TF | 401 Julian Markham House 114 Walworth Road SE17 1JL |
| 14 West Square London SE11 4SN | Apartment 4102 8 Walworth Road SE1 6EL |
| 22a Hayles Street London SE11 4SS | Apartment 4103 8 Walworth Road SE1 6EL |
| Top Floor 97 Brook Drive SE11 4TU | Apartment 4101 8 Walworth Road SE1 6EL |
| Flat 1 95 Brook Drive SE11 4TU | Apartment 4004 8 Walworth Road SE1 6EL |
| Top Flat 17 Oswin Street SE11 4TF | Apartment 4005 8 Walworth Road SE1 6EL |
| Flat B 37 Oswin Street SE11 4TF | Apartment 4104 8 Walworth Road SE1 6EL |
| 22b Hayles Street London SE11 4SS | Apartment 4203 8 Walworth Road SE1 6EL |
| First Floor And Second Floor Flat 63 Elliott's Row SE11 4SZ | 6 Walworth Road London SE1 6EB |
| 15 Hedger Street London SE11 4ST | Apartment 4202 8 Walworth Road SE1 6EL |
| 17 Hedger Street London SE11 4ST | Apartment 4105 8 Walworth Road SE1 6EL |
| 11 Hedger Street London SE11 4ST | Apartment 4201 8 Walworth Road SE1 6EL |
| 13 Hedger Street London SE11 4ST | Apartment 3701 8 Walworth Road SE1 6EL |
| 4 Orient Street London SE11 4SR | Apartment 3305 8 Walworth Road SE1 6EJ |
| 6 Orient Street London SE11 4SR | Apartment 3306 8 Walworth Road SE1 6EJ |
| 19 Hedger Street London SE11 4ST | Apartment 3304 8 Walworth Road SE1 6EJ |
| 2 Orient Street London SE11 4SR | Apartment 3302 8 Walworth Road SE1 6EJ |
| 33 Oswin Street London SE11 4TF | Apartment 3303 8 Walworth Road SE1 6EJ |
| 1 Hedger Street London SE11 4ST | Apartment 3307 8 Walworth Road SE1 6EJ |
| Flat 37 71-89 Brook Drive SE11 4TR | Apartment 3402 8 Walworth Road SE1 6EJ |
| Flat 38 71-89 Brook Drive SE11 4TR | Apartment 3403 8 Walworth Road SE1 6EJ |
| 7 Hedger Street London SE11 4ST | Apartment 3401 8 Walworth Road SE1 6EJ |
| 9 Hedger Street London SE11 4ST | Apartment 3308 8 Walworth Road SE1 6EJ |
| 3 Hedger Street London SE11 4ST | Apartment 3309 8 Walworth Road SE1 6EJ |

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| 5 Hedger Street London SE11 4ST | Apartment 3301 8 Walworth Road SE1 6EJ |
| 8 Orient Street London SE11 4SR | Apartment 3204 8 Walworth Road SE1 6EJ |
| Flat 3 Two Eagles House SE11 4TQ | Apartment 3205 8 Walworth Road SE1 6EJ |
| Flat 4 Two Eagles House SE11 4TQ | Apartment 3203 8 Walworth Road SE1 6EJ |
| Flat 1 Two Eagles House SE11 4TQ | Apartment 3201 8 Walworth Road SE1 6EJ |
| Flat 2 Two Eagles House SE11 4TQ | Apartment 3202 8 Walworth Road SE1 6EJ |
| 119d Brook Drive London SE11 4TQ | Apartment 3206 8 Walworth Road SE1 6EJ |
| 11 West Square London SE11 4SN | Apartment 3210 8 Walworth Road SE1 6EJ |
| 119a Brook Drive London SE11 4TQ | Apartment 3211 8 Walworth Road SE1 6EJ |
| 119b Brook Drive London SE11 4TQ | Apartment 3209 8 Walworth Road SE1 6EJ |
| 19 West Square London SE11 4SN | Apartment 3207 8 Walworth Road SE1 6EJ |
| 7 West Square London SE11 4SN | Apartment 3208 8 Walworth Road SE1 6EJ |
| 18 West Square London SE11 4SN | Apartment 3404 8 Walworth Road SE1 6EJ |
| 8 West Square London SE11 4SN | Apartment 3602 8 Walworth Road SE1 6EL |
| 16 West Square London SE11 4SN | Apartment 3603 8 Walworth Road SE1 6EL |
| 15 West Square London SE11 4SN | Apartment 3601 8 Walworth Road SE1 6EL |
| 6 West Square London SE11 4SN | Apartment 3508 8 Walworth Road SE1 6EJ |
| 12 West Square London SE11 4SN | Apartment 3509 8 Walworth Road SE1 6EJ |
| Flat 3 5 Oswin Street SE11 4TF | Apartment 3604 8 Walworth Road SE1 6EL |
| Middle Flat 17 Oswin Street SE11 4TF | Apartment 3608 8 Walworth Road SE1 6EL |
| Flat A 37 Oswin Street SE11 4TF | Apartment 3609 8 Walworth Road SE1 6EL |
| Top Floor Flat 25 Oswin Street SE11 4TF | Apartment 3607 8 Walworth Road SE1 6EL |
| Ground Floor Flat 7 Oswin Street SE11 4TF | Apartment 3605 8 Walworth Road SE1 6EL |
| Ground Floor Flat 25 Oswin Street SE11 4TF | Apartment 3606 8 Walworth Road SE1 6EL |
| Ground Floor Flat 28 West Square SE11 4SP | Apartment 3507 8 Walworth Road SE1 6EJ |
| Ground Floor Flat 9 Hayles Street SE11 4SU | Apartment 3408 8 Walworth Road SE1 6EJ |
| Ground Floor Flat 15 Austral Street SE11 4SJ | Apartment 3409 8 Walworth Road SE1 6EJ |
| Flat 6 5 Oswin Street SE11 4TF | Apartment 3407 8 Walworth Road SE1 6EJ |
| Flat 7 5 Oswin Street SE11 4TF | Apartment 3405 8 Walworth Road SE1 6EJ |
| Flat 4 5 Oswin Street SE11 4TF | Apartment 3406 8 Walworth Road SE1 6EJ |
| Flat 5 5 Oswin Street SE11 4TF | Apartment 3501 8 Walworth Road SE1 6EJ |
| First Floor And Second Floor Flat 25 Gaywood Street SE1 6HG | Apartment 3505 8 Walworth Road SE1 6EJ |
| First Floor And Second Floor Flat 9 Hayles Street SE11 4SU | Apartment 3506 8 Walworth Road SE1 6EJ |
| Basement Flat 25 West Square SE11 4SP | Apartment 3504 8 Walworth Road SE1 6EJ |
| Basement And Ground Floor Flat 25 Gaywood Street SE1 6HG | Apartment 3502 8 Walworth Road SE1 6EJ |
| Ground Floor Flat 9 Austral Street SE11 4SJ | Apartment 3503 8 Walworth Road SE1 6EJ |
| Unit 5 Perronet House Gaywood Estate SE1 6JR | 41 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Basement And Part Ground Floor 21 St Georges Road SE1 6ES | 42 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Southwark College West Square SE11 4SN | 40 Metro Central Heights 119 Newington Causeway SE1 6BA |
| First Floor 21 St Georges Road SE1 6ES | 38 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Charlotte Sharman Primary School West Square SE11 4SN | 39 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Second Floor Flat 28 West Square SE11 4SP | 43 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Second Floor Flat 9 Austral Street SE11 4SJ | 47 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Second Floor And Third Floor Flat 15 Austral Street SE11 4SJ | 48 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat C 37 Oswin Street SE11 4TF | 46 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 20 Metropolis Oswin Street SE11 4TF | 44 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 74 London Road London SE1 6LW | 45 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat D 37 Oswin Street SE11 4TF | 36 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Third Floor Flat 28 West Square SE11 4SP | 27 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat A 109 Brook Drive SE11 4TU | 28 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat B 109 Brook Drive SE11 4TU | 26 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat A 107 Brook Drive SE11 4TU | 24 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat B 107 Brook Drive SE11 4TU | 25 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat A 115 Brook Drive SE11 4TU | 29 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat B 115 Brook Drive SE11 4TU | 34 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat A 113 Brook Drive SE11 4TU | 35 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat B 113 Brook Drive SE11 4TU | 33 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 147a Brook Drive London SE11 4TQ | 31 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat A 105 Brook Drive SE11 4TU | 32 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 143a Brook Drive London SE11 4TQ | 64 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 145a Brook Drive London SE11 4TQ | 65 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat B 105 Brook Drive SE11 4TU | 63 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat B 99 Brook Drive SE11 4TU | 61 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat A 99 Brook Drive SE11 4TU | 62 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat A 111 Brook Drive SE11 4TU | 66 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 137b Brook Drive London SE11 4TQ | 71 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 143b Brook Drive London SE11 4TQ | 72 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 125b Brook Drive London SE11 4TQ | 70 Metro Central Heights 119 Newington Causeway SE1 6BA |
| 131b Brook Drive London SE11 4TQ | 68 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat 10 71-89 Brook Drive SE11 4TR | 69 Metro Central Heights 119 Newington Causeway SE1 6BA |
| Flat 11 71-89 Brook Drive SE11 4TR | 60 Metro Central Heights 119 Newington Causeway SE1 6BA |

145b Brook Drive London SE11 4TQ
147b Brook Drive London SE11 4TQ
Flat 2 65-66 Elliott's Row SE11 4SZ
Flat 3 65-66 Elliott's Row SE11 4SZ
Flat B 111 Brook Drive SE11 4TU
Flat 1 65-66 Elliott's Row SE11 4SZ
165b Brook Drive London SE11 4TG
175b Brook Drive London SE11 4TG
Flat 4 65-66 Elliott's Row SE11 4SZ
161b Brook Drive London SE11 4TG
68 Hayles Buildings Elliott's Row SE11 4TD
69 Hayles Buildings Elliott's Row SE11 4TD
66 Hayles Buildings Elliott's Row SE11 4TD
67 Hayles Buildings Elliott's Row SE11 4TD
72 Hayles Buildings Elliott's Row SE11 4TD
73 Hayles Buildings Elliott's Row SE11 4TD
70 Hayles Buildings Elliott's Row SE11 4TD
71 Hayles Buildings Elliott's Row SE11 4TD
60 Hayles Buildings Elliott's Row SE11 4TD
61 Hayles Buildings Elliott's Row SE11 4TD
58 Hayles Buildings Elliott's Row SE11 4TD
59 Hayles Buildings Elliott's Row SE11 4TD
64 Hayles Buildings Elliott's Row SE11 4TD
65 Hayles Buildings Elliott's Row SE11 4TD
62 Hayles Buildings Elliott's Row SE11 4TD
63 Hayles Buildings Elliott's Row SE11 4TD
74 Hayles Buildings Elliott's Row SE11 4TD
161a Brook Drive London SE11 4TG
175a Brook Drive London SE11 4TG
83 Hayles Buildings Elliott's Row SE11 4TD
84 Hayles Buildings Elliott's Row SE11 4TD
137a Brook Drive London SE11 4TQ
139a Brook Drive London SE11 4TQ
125a Brook Drive London SE11 4TQ
131a Brook Drive London SE11 4TQ
77 Hayles Buildings Elliott's Row SE11 4TD
78 Hayles Buildings Elliott's Row SE11 4TD
75 Hayles Buildings Elliott's Row SE11 4TD
76 Hayles Buildings Elliott's Row SE11 4TD
81 Hayles Buildings Elliott's Row SE11 4TD
82 Hayles Buildings Elliott's Row SE11 4TD
79 Hayles Buildings Elliott's Row SE11 4TD
80 Hayles Buildings Elliott's Row SE11 4TD
Flat 12 71-89 Brook Drive SE11 4TR
13 Orient Street London SE11 4SR
47 West Square London SE11 4SP
19 Metropolis Oswin Street SE11 4TF
34 West Square London SE11 4SP
193 Brook Drive London SE11 4TG
19 Orient Street London SE11 4SR
173 Brook Drive London SE11 4TG
12 Metropolis Oswin Street SE11 4TF
14 Metropolis Oswin Street SE11 4TF
10 Metropolis Oswin Street SE11 4TF
11 Metropolis Oswin Street SE11 4TF
17 Metropolis Oswin Street SE11 4TF
18 Metropolis Oswin Street SE11 4TF
15 Metropolis Oswin Street SE11 4TF
16 Metropolis Oswin Street SE11 4TF
139b Brook Drive London SE11 4TQ
Flat 31 71-89 Brook Drive SE11 4TR
Flat 32 71-89 Brook Drive SE11 4TR
Flat 29 71-89 Brook Drive SE11 4TR
Flat 30 71-89 Brook Drive SE11 4TR
Flat 35 71-89 Brook Drive SE11 4TR
Flat 36 71-89 Brook Drive SE11 4TR
Flat 33 71-89 Brook Drive SE11 4TR
Flat 34 71-89 Brook Drive SE11 4TR
Flat 23 71-89 Brook Drive SE11 4TR
Flat 24 71-89 Brook Drive SE11 4TR
Flat 21 71-89 Brook Drive SE11 4TR
Flat 22 71-89 Brook Drive SE11 4TR
Flat 27 71-89 Brook Drive SE11 4TR
Flat 28 71-89 Brook Drive SE11 4TR

52 Metro Central Heights 119 Newington Causeway SE1 6BA
53 Metro Central Heights 119 Newington Causeway SE1 6BA
51 Metro Central Heights 119 Newington Causeway SE1 6BA
49 Metro Central Heights 119 Newington Causeway SE1 6BA
50 Metro Central Heights 119 Newington Causeway SE1 6BA
54 Metro Central Heights 119 Newington Causeway SE1 6BA
58 Metro Central Heights 119 Newington Causeway SE1 6BA
59 Metro Central Heights 119 Newington Causeway SE1 6BA
57 Metro Central Heights 119 Newington Causeway SE1 6BA
55 Metro Central Heights 119 Newington Causeway SE1 6BA
56 Metro Central Heights 119 Newington Causeway SE1 6BA
22 Metro Central Heights 119 Newington Causeway SE1 6BA
Flat 12 St Matthews Court SE1 6RG
Flat 13 St Matthews Court SE1 6RG
Flat 11 St Matthews Court SE1 6RG
Flat 9 St Matthews Court SE1 6RG
Flat 10 St Matthews Court SE1 6RG
Flat 14 St Matthews Court SE1 6RG
32 New Kent Road London SE1 6TJ
The Rectory St Matthews Court SE1 6RG
Flat 15 St Matthews Court SE1 6RG
Flat 16 St Matthews Court SE1 6RG
Flat 8 St Matthews Court SE1 6RG
The Charlie Chaplin 26 New Kent Road SE1 6TJ
Flat 1 St Matthews Court SE1 6RG
50 New Kent Road London SE1 6TW
Flat 10a Binnie House Rockingham Estate SE1 6QG
81 New Kent Road London SE1 6RB
Flat 2 St Matthews Court SE1 6RG
Flat 6 St Matthews Court SE1 6RG
Flat 7 St Matthews Court SE1 6RG
Flat 5 St Matthews Court SE1 6RG
Flat 3 St Matthews Court SE1 6RG
Flat 4 St Matthews Court SE1 6RG
14 Metro Central Heights 119 Newington Causeway SE1 6BA
15 Metro Central Heights 119 Newington Causeway SE1 6BA
13 Metro Central Heights 119 Newington Causeway SE1 6BA
11 Metro Central Heights 119 Newington Causeway SE1 6BA
12 Metro Central Heights 119 Newington Causeway SE1 6BA
16 Metro Central Heights 119 Newington Causeway SE1 6BA
20 Metro Central Heights 119 Newington Causeway SE1 6BA
21 Metro Central Heights 119 Newington Causeway SE1 6BA
19 Metro Central Heights 119 Newington Causeway SE1 6BA
17 Metro Central Heights 119 Newington Causeway SE1 6BA
18 Metro Central Heights 119 Newington Causeway SE1 6BA
10 Metro Central Heights 119 Newington Causeway SE1 6BA
2 Metro Central Heights 119 Newington Causeway SE1 6BA
Flat 3 Metro Central Heights SE1 6BA
1 Metro Central Heights 119 Newington Causeway SE1 6BA
30 New Kent Road London SE1 6TJ
34 New Kent Road London SE1 6TJ
Flat 4 Metro Central Heights SE1 6BA
8 Metro Central Heights 119 Newington Causeway SE1 6BA
9 Metro Central Heights 119 Newington Causeway SE1 6BA
7 Metro Central Heights 119 Newington Causeway SE1 6BA
Flat 5 Metro Central Heights SE1 6BA
6 Metro Central Heights 119 Newington Causeway SE1 6BA
142 Metro Central Heights 119 Newington Causeway SE1 6BT
143 Metro Central Heights 119 Newington Causeway SE1 6BT
141 Metro Central Heights 119 Newington Causeway SE1 6BT
138 Metro Central Heights 119 Newington Causeway SE1 6BT
139 Metro Central Heights 119 Newington Causeway SE1 6BT
144 Metro Central Heights 119 Newington Causeway SE1 6BT
149 Metro Central Heights 119 Newington Causeway SE1 6BT
150 Metro Central Heights 119 Newington Causeway SE1 6BT
148 Metro Central Heights 119 Newington Causeway SE1 6BT
145 Metro Central Heights 119 Newington Causeway SE1 6BT
146 Metro Central Heights 119 Newington Causeway SE1 6BT
137 Metro Central Heights 119 Newington Causeway SE1 6BT
128 Metro Central Heights 119 Newington Causeway SE1 6BB
129 Metro Central Heights 119 Newington Causeway SE1 6BB
127 Metro Central Heights 119 Newington Causeway SE1 6BB
124 Metro Central Heights 119 Newington Causeway SE1 6BB
126 Metro Central Heights 119 Newington Causeway SE1 6BB

Flat 25 71-89 Brook Drive SE11 4TR
 Flat 26 71-89 Brook Drive SE11 4TR
 Flat 3 71-89 Brook Drive SE11 4TR
 Flat 4 71-89 Brook Drive SE11 4TR
 Flat 20 71-89 Brook Drive SE11 4TR
 Flat 2 71-89 Brook Drive SE11 4TR
 Flat 7 71-89 Brook Drive SE11 4TR
 Flat 8 71-89 Brook Drive SE11 4TR
 Flat 5 71-89 Brook Drive SE11 4TR
 Flat 6 71-89 Brook Drive SE11 4TR
 Flat 15 71-89 Brook Drive SE11 4TR
 Flat 16 71-89 Brook Drive SE11 4TR
 Flat 13 71-89 Brook Drive SE11 4TR
 Flat 14 71-89 Brook Drive SE11 4TR
 Flat 18 71-89 Brook Drive SE11 4TR
 Flat 19 71-89 Brook Drive SE11 4TR
 Flat 1 71-89 Brook Drive SE11 4TR
 Flat 17 71-89 Brook Drive SE11 4TR
 Flat 9 71-89 Brook Drive SE11 4TR
 4 Metropolis Oswin Street SE11 4TF
 5 Metropolis Oswin Street SE11 4TF
 2 Metropolis Oswin Street SE11 4TF
 3 Metropolis Oswin Street SE11 4TF
 8 Metropolis Oswin Street SE11 4TF
 9 Metropolis Oswin Street SE11 4TF
 6 Metropolis Oswin Street SE11 4TF
 7 Metropolis Oswin Street SE11 4TF
 3 Temple West Mews West Square SE11 4TJ
 4 Temple West Mews West Square SE11 4TJ
 1 Temple West Mews West Square SE11 4TJ
 2 Temple West Mews West Square SE11 4TJ
 7 Temple West Mews West Square SE11 4TJ
 1 Metropolis Oswin Street SE11 4TF
 5 Temple West Mews West Square SE11 4TJ
 6 Temple West Mews West Square SE11 4TJ
 6 Copperbox Apartments 35 St Georges Road SE1 6EW
 7 Copperbox Apartments 35 St Georges Road SE1 6EW
 4 Copperbox Apartments 35 St Georges Road SE1 6EW
 5 Copperbox Apartments 35 St Georges Road SE1 6EW
 72 London Road London SE1 3PA
 Garden House 44 West Square SE11 4SP
 8 Copperbox Apartments 35 St Georges Road SE1 6EW
 55c St Georges Road London SE1 6ER
 Flat 2 189 Brook Drive SE11 4TG
 Flat 3 50 Elliott's Row SE11 4SZ
 Flat 1 189 Brook Drive SE11 4TG
 2 Copperbox Apartments 35 St Georges Road SE1 6EW
 3 Copperbox Apartments 35 St Georges Road SE1 6EW
 1 Copperbox Apartments 35 St Georges Road SE1 6EW
 Flat 1 21 Oswin Street SE11 4TF
 Skipton House 80 London Road SE1 6LH
 11 Gaywood Street London SE1 6HG
 46 St Georges Road London SE1 6ET
 2 Princess Street London SE1 6JP
 17 Gaywood Street London SE1 6HG
 19 Gaywood Street London SE1 6HG
 13 Gaywood Street London SE1 6HG
 15 Gaywood Street London SE1 6HG
 48 St Georges Road London SE1 6ET
 Flat 2 21 Oswin Street SE11 4TF
 Flat 3 21 Oswin Street SE11 4TF
 Flat 2 11 Oswin Street SE11 4TF
 Flat 3 11 Oswin Street SE11 4TF
 London Underground Ltd Elephant And Castle Underground
 Station SE1 6TG
 Flat 1 11 Oswin Street SE11 4TF
 Flat 1 Wardroper House SE1 6ET
 Flat 2 Wardroper House SE1 6ET
 Flat 5 Wardroper House SE1 6ET
 Flat 6 Wardroper House SE1 6ET
 Flat 3 Wardroper House SE1 6ET
 Flat 4 Wardroper House SE1 6ET
 10a Gaywood Street London SE1 6HG
 10b Gaywood Street London SE1 6HG

130 Metro Central Heights 119 Newington Causeway SE1 6BB
 135 Metro Central Heights 119 Newington Causeway SE1 6BB
 136 Metro Central Heights 119 Newington Causeway SE1 6BB
 134 Metro Central Heights 119 Newington Causeway SE1 6BB
 131 Metro Central Heights 119 Newington Causeway SE1 6BB
 132 Metro Central Heights 119 Newington Causeway SE1 6BB
 166 Metro Central Heights 119 Newington Causeway SE1 6BT
 167 Metro Central Heights 119 Newington Causeway SE1 6BT
 165 Metro Central Heights 119 Newington Causeway SE1 6BT
 163 Metro Central Heights 119 Newington Causeway SE1 6BT
 164 Metro Central Heights 119 Newington Causeway SE1 6BT
 168 Metro Central Heights 119 Newington Causeway SE1 6BT
 173 Metro Central Heights 119 Newington Causeway SE1 6BT
 174 Metro Central Heights 119 Newington Causeway SE1 6BT
 172 Metro Central Heights 119 Newington Causeway SE1 6BT
 169 Metro Central Heights 119 Newington Causeway SE1 6BT
 170 Metro Central Heights 119 Newington Causeway SE1 6BT
 162 Metro Central Heights 119 Newington Causeway SE1 6BT
 154 Metro Central Heights 119 Newington Causeway SE1 6BT
 155 Metro Central Heights 119 Newington Causeway SE1 6BT
 153 Metro Central Heights 119 Newington Causeway SE1 6BT
 151 Metro Central Heights 119 Newington Causeway SE1 6BT
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 156 Metro Central Heights 119 Newington Causeway SE1 6BT
 160 Metro Central Heights 119 Newington Causeway SE1 6BT
 161 Metro Central Heights 119 Newington Causeway SE1 6BT
 159 Metro Central Heights 119 Newington Causeway SE1 6BT
 157 Metro Central Heights 119 Newington Causeway SE1 6BT
 158 Metro Central Heights 119 Newington Causeway SE1 6BT
 123 Metro Central Heights 119 Newington Causeway SE1 6BB
 91 Metro Central Heights 119 Newington Causeway SE1 6BB
 92 Metro Central Heights 119 Newington Causeway SE1 6BB
 90 Metro Central Heights 119 Newington Causeway SE1 6BB
 87 Metro Central Heights 119 Newington Causeway SE1 6BB
 88 Metro Central Heights 119 Newington Causeway SE1 6BB
 93 Metro Central Heights 119 Newington Causeway SE1 6BB
 97 Metro Central Heights 119 Newington Causeway SE1 6BB
 98 Metro Central Heights 119 Newington Causeway SE1 6BB
 96 Metro Central Heights 119 Newington Causeway SE1 6BB
 94 Metro Central Heights 119 Newington Causeway SE1 6BB
 95 Metro Central Heights 119 Newington Causeway SE1 6BB
 86 Metro Central Heights 119 Newington Causeway SE1 6BB
 77 Metro Central Heights 119 Newington Causeway SE1 6BB
 78 Metro Central Heights 119 Newington Causeway SE1 6BB
 76 Metro Central Heights 119 Newington Causeway SE1 6BB
 73 Metro Central Heights 119 Newington Causeway SE1 6BA
 74 Metro Central Heights 119 Newington Causeway SE1 6BA
 79 Metro Central Heights 119 Newington Causeway SE1 6BB
 84 Metro Central Heights 119 Newington Causeway SE1 6BB
 85 Metro Central Heights 119 Newington Causeway SE1 6BB
 83 Metro Central Heights 119 Newington Causeway SE1 6BB
 80 Metro Central Heights 119 Newington Causeway SE1 6BB
 81 Metro Central Heights 119 Newington Causeway SE1 6BB
 114 Metro Central Heights 119 Newington Causeway SE1 6BB
 115 Metro Central Heights 119 Newington Causeway SE1 6BB
 113 Metro Central Heights 119 Newington Causeway SE1 6BB
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 116 Metro Central Heights 119 Newington Causeway SE1 6BB
 121 Metro Central Heights 119 Newington Causeway SE1 6BB
 122 Metro Central Heights 119 Newington Causeway SE1 6BB
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 117 Metro Central Heights 119 Newington Causeway SE1 6BB
 119 Metro Central Heights 119 Newington Causeway SE1 6BB
 110 Metro Central Heights 119 Newington Causeway SE1 6BB
 102 Metro Central Heights 119 Newington Causeway SE1 6BB
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 101 Metro Central Heights 119 Newington Causeway SE1 6BB
 99 Metro Central Heights 119 Newington Causeway SE1 6BB
 100 Metro Central Heights 119 Newington Causeway SE1 6BB
 104 Metro Central Heights 119 Newington Causeway SE1 6BB
 108 Metro Central Heights 119 Newington Causeway SE1 6BB
 109 Metro Central Heights 119 Newington Causeway SE1 6BB

Flat 2 49 Elliott's Row SE11 4SZ
Flat 3 49 Elliott's Row SE11 4SZ
Office 10 Keyworth Street SE1 6NG
32c Elliott's Row London SE11 4SZ

Flat 7 Wardroper House SE1 6ET
Kiosk Outside 21 St Georges Road SE1 6ES

Flat 1 183 Brook Drive SE11 4TG

Flat 1 50 Elliott's Row SE11 4SZ

Flat 2 50 Elliott's Row SE11 4SZ

Flat 2 183 Brook Drive SE11 4TG

Flat 3 183 Brook Drive SE11 4TG

Flat 10 Wardroper House SE1 6ET

Flat 11 Wardroper House SE1 6ET

Flat 8 Wardroper House SE1 6ET

Flat 9 Wardroper House SE1 6ET

Flat 14 Wardroper House SE1 6ET

Flat 15 Wardroper House SE1 6ET

Flat 12 Wardroper House SE1 6ET

Flat 13 Wardroper House SE1 6ET

21 Gaywood Street London SE1 6HG

Flat 3 Prospect House Gaywood Estate SE1 6HF

Flat 30 Prospect House Gaywood Estate SE1 6HF

Flat 28 Prospect House Gaywood Estate SE1 6HF

Flat 29 Prospect House Gaywood Estate SE1 6HF

Flat 33 Prospect House Gaywood Estate SE1 6HF

Flat 34 Prospect House Gaywood Estate SE1 6HF

Flat 31 Prospect House Gaywood Estate SE1 6HF

Flat 32 Prospect House Gaywood Estate SE1 6HF

Flat 22 Prospect House Gaywood Estate SE1 6HF

Flat 23 Prospect House Gaywood Estate SE1 6HF

Flat 20 Prospect House Gaywood Estate SE1 6HF

Flat 21 Prospect House Gaywood Estate SE1 6HF

Flat 26 Prospect House Gaywood Estate SE1 6HF

Flat 27 Prospect House Gaywood Estate SE1 6HF

Flat 24 Prospect House Gaywood Estate SE1 6HF

Flat 25 Prospect House Gaywood Estate SE1 6HF

Flat 35 Prospect House Gaywood Estate SE1 6HF

Flat 45 Prospect House Gaywood Estate SE1 6HF

Flat 46 Prospect House Gaywood Estate SE1 6HF

Flat 43 Prospect House Gaywood Estate SE1 6HF

Flat 44 Prospect House Gaywood Estate SE1 6HF

Flat 49 Prospect House Gaywood Estate SE1 6HF

Flat 5 Prospect House Gaywood Estate SE1 6HF

Flat 47 Prospect House Gaywood Estate SE1 6HF

Flat 48 Prospect House Gaywood Estate SE1 6HF

Flat 38 Prospect House Gaywood Estate SE1 6HF

Flat 39 Prospect House Gaywood Estate SE1 6HF

Flat 36 Prospect House Gaywood Estate SE1 6HF

Flat 37 Prospect House Gaywood Estate SE1 6HF

Flat 41 Prospect House Gaywood Estate SE1 6HF

Flat 42 Prospect House Gaywood Estate SE1 6HF

Flat 4 Prospect House Gaywood Estate SE1 6HF

Flat 40 Prospect House Gaywood Estate SE1 6HF

22 Princess Street London SE1 6HJ

24 Princess Street London SE1 6HJ

20 Princess Street London SE1 6HJ

30 Princess Street London SE1 6HJ

32 Princess Street London SE1 6HJ

26 Princess Street London SE1 6HJ

28 Princess Street London SE1 6HJ

27 Gaywood Street London SE1 6HG

23 Gaywood Street London SE1 6HG

24 Gaywood Street London SE1 6HG

33 Gaywood Street London SE1 6HG

35 Gaywood Street London SE1 6HG

29 Gaywood Street London SE1 6HG

31 Gaywood Street London SE1 6HG

34 Princess Street London SE1 6HJ

Flat 15 Prospect House Gaywood Estate SE1 6HF

Flat 16 Prospect House Gaywood Estate SE1 6HF

Flat 13 Prospect House Gaywood Estate SE1 6HF

Flat 14 Prospect House Gaywood Estate SE1 6HF

Flat 19 Prospect House Gaywood Estate SE1 6HF

107 Metro Central Heights 119 Newington Causeway SE1 6BB
105 Metro Central Heights 119 Newington Causeway SE1 6BB
106 Metro Central Heights 119 Newington Causeway SE1 6BB
Elephant And Castle Public House 121 Newington Causeway
SE1 6BN

Flat 41 Wicksteed House Rockingham Estate SE1 6RQ

Flat 42 Wicksteed House Rockingham Estate SE1 6RQ

Flat 40 Wicksteed House Rockingham Estate SE1 6RQ

Flat 39 Wicksteed House Rockingham Estate SE1 6RQ

Flat 4 Wicksteed House Rockingham Estate SE1 6RQ

Flat 43 Wicksteed House Rockingham Estate SE1 6RQ

Flat 47 Wicksteed House Rockingham Estate SE1 6RQ

Flat 48 Wicksteed House Rockingham Estate SE1 6RQ

Flat 46 Wicksteed House Rockingham Estate SE1 6RQ

Flat 44 Wicksteed House Rockingham Estate SE1 6RQ

Flat 45 Wicksteed House Rockingham Estate SE1 6RQ

Flat 38 Wicksteed House Rockingham Estate SE1 6RQ

Flat 30 Wicksteed House Rockingham Estate SE1 6RQ

Flat 31 Wicksteed House Rockingham Estate SE1 6RQ

Flat 3 Wicksteed House Rockingham Estate SE1 6RQ

Flat 28 Wicksteed House Rockingham Estate SE1 6RQ

Flat 29 Wicksteed House Rockingham Estate SE1 6RQ

Flat 32 Wicksteed House Rockingham Estate SE1 6RQ

Flat 36 Wicksteed House Rockingham Estate SE1 6RQ

Flat 37 Wicksteed House Rockingham Estate SE1 6RQ

Flat 35 Wicksteed House Rockingham Estate SE1 6RQ

Flat 33 Wicksteed House Rockingham Estate SE1 6RQ

Flat 34 Wicksteed House Rockingham Estate SE1 6RQ

Flat 9 Wicksteed House Rockingham Estate SE1 6RQ

Flat 1 Albert Barnes House SE1 6PH

Flat 7 Wicksteed House Rockingham Estate SE1 6RQ

Flat 6 Wicksteed House Rockingham Estate SE1 6RQ

Flat 60 Wicksteed House Rockingham Estate SE1 6RQ

Flat 10 Albert Barnes House SE1 6PH

Flat 14 Albert Barnes House SE1 6PH

Flat 15 Albert Barnes House SE1 6PH

Flat 13 Albert Barnes House SE1 6PH

Flat 11 Albert Barnes House SE1 6PH

Flat 12 Albert Barnes House SE1 6PH

Flat 59 Wicksteed House Rockingham Estate SE1 6RQ

Flat 51 Wicksteed House Rockingham Estate SE1 6RQ

Flat 52 Wicksteed House Rockingham Estate SE1 6RQ

Flat 50 Wicksteed House Rockingham Estate SE1 6RQ

Flat 49 Wicksteed House Rockingham Estate SE1 6RQ

Flat 5 Wicksteed House Rockingham Estate SE1 6RQ

Flat 53 Wicksteed House Rockingham Estate SE1 6RQ

Flat 57 Wicksteed House Rockingham Estate SE1 6RQ

Flat 58 Wicksteed House Rockingham Estate SE1 6RQ

Flat 56 Wicksteed House Rockingham Estate SE1 6RQ

Flat 54 Wicksteed House Rockingham Estate SE1 6RQ

Flat 55 Wicksteed House Rockingham Estate SE1 6RQ

Flat 27 Wicksteed House Rockingham Estate SE1 6RQ

Flat 78 Wicksteed House Rockingham Estate SE1 6RH

Flat 79 Wicksteed House Rockingham Estate SE1 6RH

Flat 77 Wicksteed House Rockingham Estate SE1 6RH

Flat 75 Wicksteed House Rockingham Estate SE1 6RH

Flat 76 Wicksteed House Rockingham Estate SE1 6RH

Flat 80 Wicksteed House Rockingham Estate SE1 6RH

Flat 84 Wicksteed House Rockingham Estate SE1 6RH

Flat 85 Wicksteed House Rockingham Estate SE1 6RH

Flat 83 Wicksteed House Rockingham Estate SE1 6RH

Flat 81 Wicksteed House Rockingham Estate SE1 6RH

Flat 82 Wicksteed House Rockingham Estate SE1 6RH

Flat 74 Wicksteed House Rockingham Estate SE1 6RH

Flat 66 Wicksteed House Rockingham Estate SE1 6RH

Flat 67 Wicksteed House Rockingham Estate SE1 6RH

Flat 65 Wicksteed House Rockingham Estate SE1 6RH

Flat 63 Wicksteed House Rockingham Estate SE1 6RH

Flat 64 Wicksteed House Rockingham Estate SE1 6RH

Flat 68 Wicksteed House Rockingham Estate SE1 6RH

Flat 72 Wicksteed House Rockingham Estate SE1 6RH

Flat 73 Wicksteed House Rockingham Estate SE1 6RH

Flat 71 Wicksteed House Rockingham Estate SE1 6RH

Flat 69 Wicksteed House Rockingham Estate SE1 6RH

Flat 2 Prospect House Gaywood Estate SE1 6HF
 Flat 17 Prospect House Gaywood Estate SE1 6HF
 Flat 18 Prospect House Gaywood Estate SE1 6HF
 40 Princess Street London SE1 6HJ
 42 Princess Street London SE1 6HJ
 36 Princess Street London SE1 6HJ
 38 Princess Street London SE1 6HJ
 Flat 11 Prospect House Gaywood Estate SE1 6HF
 Flat 12 Prospect House Gaywood Estate SE1 6HF
 Flat 1 Prospect House Gaywood Estate SE1 6HF
 Flat 10 Prospect House Gaywood Estate SE1 6HF
 32b Elliott's Row London SE11 4SZ
 First Floor And Second Floor Flat 22 West Square SE11 4SN
 Flat B 13 Hayles Street SE11 4SU
 Flat C 13 Hayles Street SE11 4SU
 Ground Floor Flat 177 Brook Drive SE11 4TG
 Flat A 13 Hayles Street SE11 4SU
 Flat A Ground Floor 19 Oswin Street SE11 4TF
 First Floor And Second Floor Flat 191 Brook Drive SE11 4TG
 Flat B First Floor 19 Oswin Street SE11 4TF
 Flat C Top Floor 19 Oswin Street SE11 4TF
 34 Hayles Street London SE11 4SS
 10 Keyworth Street London SE1 6NG
 Flat 1 43 Oswin Street SE11 4TF
 Flat 10 43 Oswin Street SE11 4TF
 Adjacent 74 London Road London Road SE1 6LW
 Second Floor And Third Floor Flat 17 Oswin Street SE11 4TF
 Flat 4 43 Oswin Street SE11 4TF
 Flat 5 43 Oswin Street SE11 4TF
 Flat 2 43 Oswin Street SE11 4TF
 Flat 3 43 Oswin Street SE11 4TF
 Second Floor And Third Floor Flat 1 Austral Street SE11 4SJ
 Ground Floor Flat 1 Austral Street SE11 4SJ
 First Floor Flat 1 Austral Street SE11 4SJ
 The Flat Metropolitan Tabernacle SE1 6SB
 London College Of Printing And Graphic Art Elephant And Castle SE1 6SB
 Flat 6 43 Oswin Street SE11 4TF
 Basement And Ground Floor Flat 22 West Square SE11 4SN
 Elephant Kiosk Outside Underground Station Elephant And Castle SE1 6LW
 Metropolitan Tabernacle Church Elephant And Castle SE1 6SD
 7b Hayles Street London SE11 4SU
 Imperial War Museum Annex Austral Street SE11 4SJ
 Flat 9 43 Oswin Street SE11 4TF
 Second Floor Left 21 St Georges Road SE1 6ES
 Flat 7 43 Oswin Street SE11 4TF
 Flat 8 43 Oswin Street SE11 4TF
 Third Floor Flat 30 West Square SE11 4SP
 Second Floor Right 21 St Georges Road SE1 6ES
 Ground Floor Flat 30 West Square SE11 4SP
 Unit 5b 10 Keyworth Street SE1 6NG
 Unit 5c 10 Keyworth Street SE1 6NG
 Unit 4f 10 Keyworth Street SE1 6NG
 Unit 5a 10 Keyworth Street SE1 6NG
 Unit 5f 10 Keyworth Street SE1 6NG
 Unit 6a 10 Keyworth Street SE1 6NG
 Unit 5d 10 Keyworth Street SE1 6NG
 Unit 5e 10 Keyworth Street SE1 6NG
 Unit 3f 10 Keyworth Street SE1 6NG
 Unit 4a 10 Keyworth Street SE1 6NG
 Unit 3d 10 Keyworth Street SE1 6NG
 Unit 3e 10 Keyworth Street SE1 6NG
 Unit 4d 10 Keyworth Street SE1 6NG
 Unit 4e 10 Keyworth Street SE1 6NG
 Unit 4b 10 Keyworth Street SE1 6NG
 Unit 4c 10 Keyworth Street SE1 6NG
 Unit 6b 10 Keyworth Street SE1 6NG
 Flat B 23 Oswin Street SE11 4TF
 Flat C 23 Oswin Street SE11 4TF
 Flat 3 54 Elliott's Row SE11 4SZ
 Flat A 23 Oswin Street SE11 4TF
 51a St Georges Road London SE1 6ER
 Flat 70 Wicksteed House Rockingham Estate SE1 6RH
 Flat 19 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 20 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 18 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 16 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 17 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 21 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 25 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 26 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 24 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 22 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 23 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 15 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 89 Wicksteed House Rockingham Estate SE1 6RH
 Flat 90 Wicksteed House Rockingham Estate SE1 6RH
 Flat 88 Wicksteed House Rockingham Estate SE1 6RH
 Flat 86 Wicksteed House Rockingham Estate SE1 6RH
 Flat 87 Wicksteed House Rockingham Estate SE1 6RH
 Flat 1 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 13 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 14 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 12 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 10 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 11 Wicksteed House Rockingham Estate SE1 6RQ
 Flat 70 Albert Barnes House SE1 6PJ
 Flat 71 Albert Barnes House SE1 6PJ
 Flat 69 Albert Barnes House SE1 6PJ
 Flat 67 Albert Barnes House SE1 6PJ
 Flat 68 Albert Barnes House SE1 6PJ
 Flat 72 Albert Barnes House SE1 6PJ
 Flat 76 Albert Barnes House SE1 6PJ
 Flat 77 Albert Barnes House SE1 6PJ
 Flat 75 Albert Barnes House SE1 6PJ
 Flat 73 Albert Barnes House SE1 6PJ
 Flat 74 Albert Barnes House SE1 6PJ
 Flat 66 Albert Barnes House SE1 6PJ
 Flat 58 Albert Barnes House SE1 6PJ
 Flat 59 Albert Barnes House SE1 6PJ
 Flat 57 Albert Barnes House SE1 6PJ
 Flat 55 Albert Barnes House SE1 6PJ
 Flat 56 Albert Barnes House SE1 6PJ
 Flat 60 Albert Barnes House SE1 6PJ
 Flat 64 Albert Barnes House SE1 6PJ
 Flat 65 Albert Barnes House SE1 6PJ
 Flat 63 Albert Barnes House SE1 6PJ
 Flat 61 Albert Barnes House SE1 6PJ
 Flat 62 Albert Barnes House SE1 6PJ
 Flat 93 Albert Barnes House SE1 6PJ
 Flat 94 Albert Barnes House SE1 6PJ
 Flat 92 Albert Barnes House SE1 6PJ
 Flat 90 Albert Barnes House SE1 6PJ
 Flat 91 Albert Barnes House SE1 6PJ
 Flat 95 Albert Barnes House SE1 6PJ
 Flat 99 Albert Barnes House SE1 6PJ
 Brotherhood Of The Cross And Star Falmouth Road SE1 6RT
 Flat 98 Albert Barnes House SE1 6PJ
 Flat 96 Albert Barnes House SE1 6PJ
 Flat 97 Albert Barnes House SE1 6PJ
 Flat 89 Albert Barnes House SE1 6PJ
 Flat 81 Albert Barnes House SE1 6PJ
 Flat 82 Albert Barnes House SE1 6PJ
 Flat 80 Albert Barnes House SE1 6PJ
 Flat 78 Albert Barnes House SE1 6PJ
 Flat 79 Albert Barnes House SE1 6PJ
 Flat 83 Albert Barnes House SE1 6PJ
 Flat 87 Albert Barnes House SE1 6PJ
 Flat 88 Albert Barnes House SE1 6PJ
 Flat 86 Albert Barnes House SE1 6PJ
 Flat 84 Albert Barnes House SE1 6PJ
 Flat 85 Albert Barnes House SE1 6PJ
 Flat 54 Albert Barnes House SE1 6PJ

Flat 1 49 Elliott's Row SE11 4SZ
 Flat D 23 Oswin Street SE11 4TF
 Flat E 23 Oswin Street SE11 4TF
 Unit 6e 10 Keyworth Street SE1 6NG
 Unit 6f 10 Keyworth Street SE1 6NG
 Unit 6c 10 Keyworth Street SE1 6NG
 Unit 6d 10 Keyworth Street SE1 6NG
 Flat 1 54 Elliott's Row SE11 4SZ
 Flat 2 54 Elliott's Row SE11 4SZ
 First Floor Flat 177 Brook Drive SE11 4TG
 Second Floor Flat 177 Brook Drive SE11 4TG
 Flat 2 187 Brook Drive SE11 4TG
 Flat 3 187 Brook Drive SE11 4TG
 55b St Georges Road London SE1 6ER
 Flat 1 187 Brook Drive SE11 4TG
 Flat B 117 Brook Drive SE11 4TU
 Flat 4 187 Brook Drive SE11 4TG
 Flat A 117 Brook Drive SE11 4TU
 35b Elliott's Row London SE11 4SZ
 Siobhan Davies Studios 85 St Georges Road SE1 6ER
 35a Elliott's Row London SE11 4SZ
 Flat B 46 Elliott's Row SE11 4SZ
 Flat A 46 Elliott's Row SE11 4SZ
 Ground Floor Flat 191 Brook Drive SE11 4TG
 Flat 1 15 Hayles Street SE11 4SU
 Unit 2d 10 Keyworth Street SE1 6NG
 Unit 2e 10 Keyworth Street SE1 6NG
 Unit 2b 10 Keyworth Street SE1 6NG
 Unit 2c 10 Keyworth Street SE1 6NG
 Unit 3b 10 Keyworth Street SE1 6NG
 Unit 3c 10 Keyworth Street SE1 6NG
 Unit 2f 10 Keyworth Street SE1 6NG
 Unit 3a 10 Keyworth Street SE1 6NG
 Unit 1a 10 Keyworth Street SE1 6NG
 Unit 1b 10 Keyworth Street SE1 6NG
 Flat 2 15 Hayles Street SE11 4SU
 Flat 3 15 Hayles Street SE11 4SU
 Unit 1e 10 Keyworth Street SE1 6NG
 Unit 2a 10 Keyworth Street SE1 6NG
 Unit 1c 10 Keyworth Street SE1 6NG
 Unit 1d 10 Keyworth Street SE1 6NG
 Flat 50 Prospect House Gaywood Estate SE1 6HF
 4 St Georges Buildings St Georges Road SE1 6EP
 5 St Georges Buildings St Georges Road SE1 6EP
 3 St Georges Buildings St Georges Road SE1 6EP
 34 St Georges Buildings St Georges Road SE1 6EP
 8 St Georges Buildings St Georges Road SE1 6EP
 9 St Georges Buildings St Georges Road SE1 6EP
 6 St Georges Buildings St Georges Road SE1 6EP
 7 St Georges Buildings St Georges Road SE1 6EP
 10 St Georges Buildings St Georges Road SE1 6EP
 11 St Georges Buildings St Georges Road SE1 6EP
 83 St Georges Road London SE1 6ER
 1 St Georges Buildings St Georges Road SE1 6EP
 22 St Georges Buildings St Georges Road SE1 6EP
 28 St Georges Buildings St Georges Road SE1 6EP
 12 St Georges Buildings St Georges Road SE1 6EP
 2 St Georges Buildings St Georges Road SE1 6EP
 Flat 83 Perronet House Gaywood Estate SE1 6JS
 Flat 22 Newman House Gaywood Estate SE1 6HE
 Flat 23 Newman House Gaywood Estate SE1 6HE
 Flat 20 Newman House Gaywood Estate SE1 6HE
 Flat 21 Newman House Gaywood Estate SE1 6HE
 Flat 26 Newman House Gaywood Estate SE1 6HE
 Flat 27 Newman House Gaywood Estate SE1 6HE
 Flat 24 Newman House Gaywood Estate SE1 6HE
 Flat 25 Newman House Gaywood Estate SE1 6HE
 Flat 86 Perronet House Gaywood Estate SE1 6JS
 Flat 87 Perronet House Gaywood Estate SE1 6JS
 Flat 84 Perronet House Gaywood Estate SE1 6JS
 Flat 85 Perronet House Gaywood Estate SE1 6JS
 Flat 90 Perronet House Gaywood Estate SE1 6JS
 Flat 19 Newman House Gaywood Estate SE1 6HE
 Flat 88 Perronet House Gaywood Estate SE1 6JS

Flat 3 Albert Barnes House SE1 6PH
 Flat 30 Albert Barnes House SE1 6PH
 Flat 29 Albert Barnes House SE1 6PH
 Flat 27 Albert Barnes House SE1 6PH
 Flat 28 Albert Barnes House SE1 6PH
 Flat 31 Albert Barnes House SE1 6PH
 Flat 35 Albert Barnes House SE1 6PH
 Flat 36 Albert Barnes House SE1 6PH
 Flat 34 Albert Barnes House SE1 6PH
 Flat 32 Albert Barnes House SE1 6PH
 Flat 33 Albert Barnes House SE1 6PH
 Flat 26 Albert Barnes House SE1 6PH
 Flat 19 Albert Barnes House SE1 6PH
 Flat 2 Albert Barnes House SE1 6PH
 Flat 18 Albert Barnes House SE1 6PH
 Flat 16 Albert Barnes House SE1 6PH
 Flat 17 Albert Barnes House SE1 6PH
 Flat 20 Albert Barnes House SE1 6PH
 Flat 24 Albert Barnes House SE1 6PH
 Flat 25 Albert Barnes House SE1 6PH
 Flat 23 Albert Barnes House SE1 6PH
 Flat 21 Albert Barnes House SE1 6PH
 Flat 22 Albert Barnes House SE1 6PH
 Flat 6 Albert Barnes House SE1 6PH
 Flat 7 Albert Barnes House SE1 6PH
 Flat 5 Albert Barnes House SE1 6PH
 Flat 48 Albert Barnes House SE1 6PH
 Flat 49 Albert Barnes House SE1 6PH
 Flat 8 Albert Barnes House SE1 6PH
 Flat 52 Albert Barnes House SE1 6PJ
 Flat 53 Albert Barnes House SE1 6PJ
 Flat 51 Albert Barnes House SE1 6PJ
 Flat 9 Albert Barnes House SE1 6PH
 Flat 50 Albert Barnes House SE1 6PJ
 Flat 47 Albert Barnes House SE1 6PH
 Flat 4 Albert Barnes House SE1 6PH
 Flat 40 Albert Barnes House SE1 6PH
 Flat 39 Albert Barnes House SE1 6PH
 Flat 37 Albert Barnes House SE1 6PH
 Flat 38 Albert Barnes House SE1 6PH
 Flat 41 Albert Barnes House SE1 6PH
 Flat 45 Albert Barnes House SE1 6PH
 Flat 46 Albert Barnes House SE1 6PH
 Flat 44 Albert Barnes House SE1 6PH
 Flat 42 Albert Barnes House SE1 6PH
 Flat 43 Albert Barnes House SE1 6PH
 398 Metro Central Heights 119 Newington Causeway SE1 6DX
 405 Metro Central Heights 119 Newington Causeway SE1 6DX
 390 Metro Central Heights 119 Newington Causeway SE1 6DX
 359 Metro Central Heights 119 Newington Causeway SE1 6DQ
 383 Metro Central Heights 119 Newington Causeway SE1 6DX
 412 Metro Central Heights 119 Newington Causeway SE1 6DX
 378a Metro Central Heights 119 Newington Causeway SE1 6DX
 379a Metro Central Heights 119 Newington Causeway SE1 6DX
 368a Metro Central Heights 119 Newington Causeway SE1 6DX
 348a Metro Central Heights 119 Newington Causeway SE1 6DQ
 358a Metro Central Heights 119 Newington Causeway SE1 6DQ
 352 Metro Central Heights 119 Newington Causeway SE1 6DQ
 277 Metro Central Heights 119 Newington Causeway SE1 6BX
 284 Metro Central Heights 119 Newington Causeway SE1 6DB
 253 Metro Central Heights 119 Newington Causeway SE1 6BX
 239 Metro Central Heights 119 Newington Causeway SE1 6BX
 246 Metro Central Heights 119 Newington Causeway SE1 6BX
 292 Metro Central Heights 119 Newington Causeway SE1 6DB
 337 Metro Central Heights 119 Newington Causeway SE1 6DQ
 345 Metro Central Heights 119 Newington Causeway SE1 6DQ
 330 Metro Central Heights 119 Newington Causeway SE1 6DQ
 299 Metro Central Heights 119 Newington Causeway SE1 6DB
 306 Metro Central Heights 119 Newington Causeway SE1 6DB
 Flat 19 83 New Kent Road SE1 6RD
 Flat 2 83 New Kent Road SE1 6RD
 Flat 18 83 New Kent Road SE1 6RD
 Flat 16 83 New Kent Road SE1 6RD
 Flat 17 83 New Kent Road SE1 6RD

Flat 89 Perronet House Gaywood Estate SE1 6JS
 Flat 82 Perronet House Gaywood Estate SE1 6JS
 Flat 80 Perronet House Gaywood Estate SE1 6JS
 Flat 81 Perronet House Gaywood Estate SE1 6JS
 Flat B 58 St Georges Road SE1 6ET
 Flat B 60 St Georges Road SE1 6ET
 Flat A 58 St Georges Road SE1 6ET
 Flat A 60 St Georges Road SE1 6ET
 Flat 74 Perronet House Gaywood Estate SE1 6JS
 Flat 75 Perronet House Gaywood Estate SE1 6JS
 Flat 72 Perronet House Gaywood Estate SE1 6JS
 Flat 73 Perronet House Gaywood Estate SE1 6JS
 Flat 78 Perronet House Gaywood Estate SE1 6JS
 Flat 79 Perronet House Gaywood Estate SE1 6JS
 Flat 76 Perronet House Gaywood Estate SE1 6JS
 Flat 77 Perronet House Gaywood Estate SE1 6JS
 Flat C 58 St Georges Road SE1 6ET
 71 St Georges Road London SE1 6ER
 73 St Georges Road London SE1 6ER
 67 St Georges Road London SE1 6ER
 69 St Georges Road London SE1 6ER
 79 St Georges Road London SE1 6ER
 81 St Georges Road London SE1 6ER
 75 St Georges Road London SE1 6ER
 77 St Georges Road London SE1 6ER
 Flat D 60 St Georges Road SE1 6ET
 Prince Of Wales 51 St Georges Road SE1 6ER
 Flat C 60 St Georges Road SE1 6ET
 Flat D 58 St Georges Road SE1 6ET
 63 St Georges Road London SE1 6ER
 65 St Georges Road London SE1 6ER
 55-57 St Georges Road London SE1 6ER
 59 St Georges Road London SE1 6ER
 Flat 28 Newman House Gaywood Estate SE1 6HE
 43 London Road London SE1 6JW
 Flat 1 44 London Road SE1 6JW
 41 London Road London SE1 6JW
 42 London Road London SE1 6JW
 Flat 4 44 London Road SE1 6JW
 Flat 5 44 London Road SE1 6JW
 Flat 2 44 London Road SE1 6JW
 Flat 3 44 London Road SE1 6JW
 Flat 33 St Georges Road SE1 6EW
 Flat 56 Prospect House Gaywood Estate SE1 6HF
 55a St Georges Road London SE1 6ER
 39 London Road London SE1 6JW
 40 London Road London SE1 6JW
 37 London Road London SE1 6JW
 38 London Road London SE1 6JW
 Flat 6 44 London Road SE1 6JW
 25 Austral Street London SE11 4SJ
 27 Austral Street London SE11 4SJ
 23 Austral Street London SE11 4SJ
 6 Austral Street London SE11 4SJ
 7 Austral Street London SE11 4SJ
 3 Austral Street London SE11 4SJ
 4 Austral Street London SE11 4SJ
 Flat 7 44 London Road SE1 6JW
 Flat 8 44 London Road SE1 6JW
 19 Austral Street London SE11 4SJ
 2 Austral Street London SE11 4SJ
 17 Austral Street London SE11 4SJ
 Flat 60 Newman House Gaywood Estate SE1 6HE
 Flat 61 Newman House Gaywood Estate SE1 6HE
 Flat 58 Newman House Gaywood Estate SE1 6HE
 Flat 59 Newman House Gaywood Estate SE1 6HE
 13 St Georges Buildings St Georges Road SE1 6EP
 14 St Georges Buildings St Georges Road SE1 6EP
 Flat 62 Newman House Gaywood Estate SE1 6HE
 250 Southwark Bridge Road London SE1 6NJ
 Flat 52 Newman House Gaywood Estate SE1 6HE
 Flat 53 Newman House Gaywood Estate SE1 6HE
 Flat 29 Newman House Gaywood Estate SE1 6HE
 Flat 51 Newman House Gaywood Estate SE1 6HE

Flat 20 83 New Kent Road SE1 6RD
 Flat 6 83 New Kent Road SE1 6RD
 Flat 7 83 New Kent Road SE1 6RD
 Flat 5 83 New Kent Road SE1 6RD
 Flat 3 83 New Kent Road SE1 6RD
 Flat 4 83 New Kent Road SE1 6RD
 Flat 15 83 New Kent Road SE1 6RD
 409a Metro Central Heights 119 Newington Causeway SE1 6DX
 Elephant And Castle Railway Station Elephant Road SE17 1LB
 399a Metro Central Heights 119 Newington Causeway SE1 6DX
 389a Metro Central Heights 119 Newington Causeway SE1 6DX
 398a Metro Central Heights 119 Newington Causeway SE1 6DX
 Flat 1 83 New Kent Road SE1 6RD
 Flat 13 83 New Kent Road SE1 6RD
 Flat 14 83 New Kent Road SE1 6RD
 Flat 12 83 New Kent Road SE1 6RD
 Flat 10 83 New Kent Road SE1 6RD
 Flat 11 83 New Kent Road SE1 6RD
 231 Metro Central Heights 119 Newington Causeway SE1 6BX
 399 Metro Central Heights 119 Newington Causeway SE1 6DX
 400 Metro Central Heights 119 Newington Causeway SE1 6DX
 397 Metro Central Heights 119 Newington Causeway SE1 6DX
 395 Metro Central Heights 119 Newington Causeway SE1 6DX
 396 Metro Central Heights 119 Newington Causeway SE1 6DX
 401 Metro Central Heights 119 Newington Causeway SE1 6DX
 406 Metro Central Heights 119 Newington Causeway SE1 6DX
 407 Metro Central Heights 119 Newington Causeway SE1 6DX
 404 Metro Central Heights 119 Newington Causeway SE1 6DX
 402 Metro Central Heights 119 Newington Causeway SE1 6DX
 403 Metro Central Heights 119 Newington Causeway SE1 6DX
 394 Metro Central Heights 119 Newington Causeway SE1 6DX
 385 Metro Central Heights 119 Newington Causeway SE1 6DX
 386 Metro Central Heights 119 Newington Causeway SE1 6DX
 384 Metro Central Heights 119 Newington Causeway SE1 6DX
 381 Metro Central Heights 119 Newington Causeway SE1 6DX
 382 Metro Central Heights 119 Newington Causeway SE1 6DX
 387 Metro Central Heights 119 Newington Causeway SE1 6DX
 392 Metro Central Heights 119 Newington Causeway SE1 6DX
 393 Metro Central Heights 119 Newington Causeway SE1 6DX
 391 Metro Central Heights 119 Newington Causeway SE1 6DX
 388 Metro Central Heights 119 Newington Causeway SE1 6DX
 389 Metro Central Heights 119 Newington Causeway SE1 6DX
 140 Metro Central Heights 119 Newington Causeway SE1 6BT
 147 Metro Central Heights 119 Newington Causeway SE1 6BT
 133 Metro Central Heights 119 Newington Causeway SE1 6BB
 118 Metro Central Heights 119 Newington Causeway SE1 6BB
 125 Metro Central Heights 119 Newington Causeway SE1 6BB
 171 Metro Central Heights 119 Newington Causeway SE1 6BT
 200 Metro Central Heights 119 Newington Causeway SE1 6BW
 224 Metro Central Heights 119 Newington Causeway SE1 6BW
 193 Metro Central Heights 119 Newington Causeway SE1 6BW
 178 Metro Central Heights 119 Newington Causeway SE1 6BT
 186 Metro Central Heights 119 Newington Causeway SE1 6BT
 89 Metro Central Heights 119 Newington Causeway SE1 6BB
 411 Metro Central Heights 119 Newington Causeway SE1 6DX
 413 Metro Central Heights 119 Newington Causeway SE1 6DX
 410 Metro Central Heights 119 Newington Causeway SE1 6DX
 408 Metro Central Heights 119 Newington Causeway SE1 6DX
 409 Metro Central Heights 119 Newington Causeway SE1 6DX
 23 Metro Central Heights 119 Newington Causeway SE1 6BA
 75 Metro Central Heights 119 Newington Causeway SE1 6BB
 82 Metro Central Heights 119 Newington Causeway SE1 6BB
 67 Metro Central Heights 119 Newington Causeway SE1 6BA
 30 Metro Central Heights 119 Newington Causeway SE1 6BA
 37 Metro Central Heights 119 Newington Causeway SE1 6BA
 Unit 7 Farrell Court SE17 1LB
 Unit 8 Farrell Court SE17 1LB
 Unit 6 Farrell Court SE17 1LB
 Unit 2 Farrell Court SE17 1LB
 Unit 3 Farrell Court SE17 1LB
 Unit 5 Metro Central Heights SE1 6BN
 Coronet Cinema 28 New Kent Road SE1 6TJ
 Railway Arch 108 New Kent Road SE1 6TJ
 Unit 1 Farrell Court SE17 1LB

Flat 56 Newman House Gaywood Estate SE1 6HE
 Flat 57 Newman House Gaywood Estate SE1 6HE
 Flat 54 Newman House Gaywood Estate SE1 6HE
 Flat 55 Newman House Gaywood Estate SE1 6HE
 15 St Georges Buildings St Georges Road SE1 6EP
 27 St Georges Buildings St Georges Road SE1 6EP
 29 St Georges Buildings St Georges Road SE1 6EP
 25 St Georges Buildings St Georges Road SE1 6EP
 26 St Georges Buildings St Georges Road SE1 6EP
 32 St Georges Buildings St Georges Road SE1 6EP
 33 St Georges Buildings St Georges Road SE1 6EP
 30 St Georges Buildings St Georges Road SE1 6EP
 31 St Georges Buildings St Georges Road SE1 6EP
 18 St Georges Buildings St Georges Road SE1 6EP
 19 St Georges Buildings St Georges Road SE1 6EP
 16 St Georges Buildings St Georges Road SE1 6EP
 17 St Georges Buildings St Georges Road SE1 6EP
 23 St Georges Buildings St Georges Road SE1 6EP
 24 St Georges Buildings St Georges Road SE1 6EP
 20 St Georges Buildings St Georges Road SE1 6EP
 21 St Georges Buildings St Georges Road SE1 6EP
 Flat B 7 Princess Street SE1 6HH
 Flat B 9 Princess Street SE1 6HH
 Flat B 17 Princess Street SE1 6HH
 Flat B 19 Princess Street SE1 6HH
 Flat 11 Laurie House Gaywood Estate SE1 6HQ
 Flat 12 Laurie House Gaywood Estate SE1 6HQ
 Flat 1 Laurie House Gaywood Estate SE1 6HQ
 Flat 10 Laurie House Gaywood Estate SE1 6HQ
 Flat A 19 Princess Street SE1 6HH
 Flat A 7 Princess Street SE1 6HH
 Flat A 15 Princess Street SE1 6HH
 Flat A 17 Princess Street SE1 6HH
 Flat B 13 Princess Street SE1 6HH
 Flat B 15 Princess Street SE1 6HH
 Flat A 9 Princess Street SE1 6HH
 Flat B 11 Princess Street SE1 6HH
 Flat 13 Laurie House Gaywood Estate SE1 6HQ
 Flat 8 Laurie House Gaywood Estate SE1 6HQ
 Flat 9 Laurie House Gaywood Estate SE1 6HQ
 Flat 6 Laurie House Gaywood Estate SE1 6HQ
 Flat 7 Laurie House Gaywood Estate SE1 6HQ
 Flat 11 Perronet House Gaywood Estate SE1 6JR
 Flat 12 Perronet House Gaywood Estate SE1 6JR
 Flat 1 Perronet House Gaywood Estate SE1 6JR
 Flat 10 Perronet House Gaywood Estate SE1 6JR
 Flat 16 Laurie House Gaywood Estate SE1 6HQ
 Flat 17 Laurie House Gaywood Estate SE1 6HQ
 Flat 14 Laurie House Gaywood Estate SE1 6HQ
 Flat 15 Laurie House Gaywood Estate SE1 6HQ
 Flat 4 Laurie House Gaywood Estate SE1 6HQ
 Flat 5 Laurie House Gaywood Estate SE1 6HQ
 Flat 2 Laurie House Gaywood Estate SE1 6HQ
 Flat 3 Laurie House Gaywood Estate SE1 6HQ
 Flat 61 Prospect House Gaywood Estate SE1 6HF
 Flat 62 Prospect House Gaywood Estate SE1 6HF
 Flat 6 Prospect House Gaywood Estate SE1 6HF
 Flat 60 Prospect House Gaywood Estate SE1 6HF
 Flat 8 Prospect House Gaywood Estate SE1 6HF
 Flat 9 Prospect House Gaywood Estate SE1 6HF
 Flat 63 Prospect House Gaywood Estate SE1 6HF
 Flat 7 Prospect House Gaywood Estate SE1 6HF
 Flat 53 Prospect House Gaywood Estate SE1 6HF
 Flat 54 Prospect House Gaywood Estate SE1 6HF
 Flat 51 Prospect House Gaywood Estate SE1 6HF
 Flat 52 Prospect House Gaywood Estate SE1 6HF
 Flat 58 Prospect House Gaywood Estate SE1 6HF
 Flat 59 Prospect House Gaywood Estate SE1 6HF
 Flat 55 Prospect House Gaywood Estate SE1 6HF
 Flat 57 Prospect House Gaywood Estate SE1 6HF
 Flat B 18 Gaywood Street SE1 6HG
 Flat B 20 Gaywood Street SE1 6HG
 Flat B 14 Gaywood Street SE1 6HG
 Flat B 16 Gaywood Street SE1 6HG
 Flat 49 Smeaton Court SE1 6PF
 Flat 50 Smeaton Court SE1 6PF
 Flat 48 Smeaton Court SE1 6PF
 Flat 46 Smeaton Court SE1 6PF
 Flat 47 Smeaton Court SE1 6PF
 Flat 51 Smeaton Court SE1 6PF
 Railway Arch 109 Elephant Road SE17 1LB
 Railway Arches 111 To 113 Elephant Road SE17 1LB
 Flat 54 Smeaton Court SE1 6PF
 Flat 52 Smeaton Court SE1 6PF
 Flat 53 Smeaton Court SE1 6PF
 Unit 2 Railway Arch 100 SE1 6PD
 Unit 3 Railway Arch 101 SE1 6PD
 Unit 1 Railway Arch 99 SE1 6PD
 1 Martin House Rockingham Street SE1 6QP
 9 Rockingham Street London SE1 6PD
 Unit 4 Railway Arch 102a SE1 6PG
 Rockingham Community Centre Falmouth Road SE1 6QP
 Flat 45 Smeaton Court SE1 6PF
 Flat 14 Smeaton Court SE1 6PF
 Flat 15 Smeaton Court SE1 6PF
 Flat 13 Smeaton Court SE1 6PF
 Flat 11 Smeaton Court SE1 6PF
 Flat 12 Smeaton Court SE1 6PF
 Flat 16 Smeaton Court SE1 6PF
 Flat 20 Smeaton Court SE1 6PF
 Flat 21 Smeaton Court SE1 6PF
 Flat 19 Smeaton Court SE1 6PF
 Flat 17 Smeaton Court SE1 6PF
 Flat 18 Smeaton Court SE1 6PF
 Flat 10 Smeaton Court SE1 6PF
 Flat 2 Smeaton Court SE1 6PF
 Flat 3 Smeaton Court SE1 6PF
 Flat 1 Smeaton Court SE1 6PF
 Flat 8 83 New Kent Road SE1 6RD
 Flat 9 83 New Kent Road SE1 6RD
 Flat 4 Smeaton Court SE1 6PF
 Flat 8 Smeaton Court SE1 6PF
 Flat 9 Smeaton Court SE1 6PF
 Flat 7 Smeaton Court SE1 6PF
 Flat 5 Smeaton Court SE1 6PF
 Flat 6 Smeaton Court SE1 6PF
 Flat 37 Smeaton Court SE1 6PF
 Flat 38 Smeaton Court SE1 6PF
 Flat 36 Smeaton Court SE1 6PF
 Flat 34 Smeaton Court SE1 6PF
 Flat 35 Smeaton Court SE1 6PF
 Flat 39 Smeaton Court SE1 6PF
 Flat 43 Smeaton Court SE1 6PF
 Flat 44 Smeaton Court SE1 6PF
 Flat 42 Smeaton Court SE1 6PF
 Flat 40 Smeaton Court SE1 6PF
 Flat 41 Smeaton Court SE1 6PF
 Flat 33 Smeaton Court SE1 6PF
 Flat 25 Smeaton Court SE1 6PF
 Flat 26 Smeaton Court SE1 6PF
 Flat 24 Smeaton Court SE1 6PF
 Flat 22 Smeaton Court SE1 6PF
 Flat 23 Smeaton Court SE1 6PF
 Flat 27 Smeaton Court SE1 6PF
 Flat 31 Smeaton Court SE1 6PF
 Flat 32 Smeaton Court SE1 6PF
 Flat 30 Smeaton Court SE1 6PF
 Flat 28 Smeaton Court SE1 6PF
 Flat 29 Smeaton Court SE1 6PF
 380 Metro Central Heights 119 Newington Causeway SE1 6DX
 244 Metro Central Heights 119 Newington Causeway SE1 6BX
 245 Metro Central Heights 119 Newington Causeway SE1 6BX
 243 Metro Central Heights 119 Newington Causeway SE1 6BX
 241 Metro Central Heights 119 Newington Causeway SE1 6BX
 242 Metro Central Heights 119 Newington Causeway SE1 6BX
 247 Metro Central Heights 119 Newington Causeway SE1 6BX
 251 Metro Central Heights 119 Newington Causeway SE1 6BX
 252 Metro Central Heights 119 Newington Causeway SE1 6BX

Flat 30 Perronet House Gaywood Estate SE1 6JR
Flat 35 Perronet House Gaywood Estate SE1 6JR
Flat 36 Perronet House Gaywood Estate SE1 6JR
Flat 33 Perronet House Gaywood Estate SE1 6JR
Flat 34 Perronet House Gaywood Estate SE1 6JR
Flat 2 144 Brook Drive SE11 4TE
Flat 3 144 Brook Drive SE11 4TE
Flat 1 144 Brook Drive SE11 4TE
Flat 6 1 Dante Road SE11 4RB
3 Dante Road London SE11 4RB
Flat 4 144 Brook Drive SE11 4TE
142 Brook Drive London SE11 4TE
Flat A 2 Dante Place SE11 4RX
140 Brook Drive London SE11 4TE
Flat 5 144 Brook Drive SE11 4TE
Flat 6 144 Brook Drive SE11 4TE
Flat 5 1 Dante Road SE11 4RB
Flat 5 158 Brook Drive SE11 4TE
Flat 6 158 Brook Drive SE11 4TE
Flat 4 158 Brook Drive SE11 4TE
Flat 2 158 Brook Drive SE11 4TE
Flat 3 158 Brook Drive SE11 4TE
2 Churchyard Row London SE11 4TW
Flat 3 1 Dante Road SE11 4RB
Flat 4 1 Dante Road SE11 4RB
Flat 2 1 Dante Road SE11 4RB
2 Dante Road London SE11 4RB
Flat 1 1 Dante Road SE11 4RB
Flat B 2 Dante Place SE11 4RX
Flat G 4 Dante Place SE11 4RX
Flat H 4 Dante Place SE11 4RX
Flat F 4 Dante Place SE11 4RX
Flat D 4 Dante Place SE11 4RX
Flat E 4 Dante Place SE11 4RX
Flat A 2 Holyoak Road SE11 4RD
Flat E 2 Holyoak Road SE11 4RD
Flat F 2 Holyoak Road SE11 4RD
Flat D 2 Holyoak Road SE11 4RD
Flat B 2 Holyoak Road SE11 4RD
Flat C 2 Holyoak Road SE11 4RD
Flat C 4 Dante Place SE11 4RX
Flat F 2 Dante Place SE11 4RX
Flat G 2 Dante Place SE11 4RX
Flat E 2 Dante Place SE11 4RX
Flat C 2 Dante Place SE11 4RX
Flat D 2 Dante Place SE11 4RX
Flat H 2 Dante Place SE11 4RX
Flat A 4 Dante Place SE11 4RX
Flat B 4 Dante Place SE11 4RX
Flat K 2 Dante Place SE11 4RX
Flat I 2 Dante Place SE11 4RX
Flat J 2 Dante Place SE11 4RX
Flat 1 158 Brook Drive SE11 4TE
97 Newington Butts London SE1 6SF
94-96 Walworth Road London SE1 6SW
103 Newington Butts London SE1 6SF
14 Walworth Road London SE1 6SY
80-82 Walworth Road London SE1 6SW
86 Newington Butts London SE11 4QU
90 Walworth Road London SE1 6SW
4 Walworth Road London SE1 6EB
86 Walworth Road London SE1 6SW
Castle Day Centre Hampton Street SE1 6SN
Flat 55 Sherston Court SE1 6SG
Flat 56 Sherston Court SE1 6SG
Flat 5 Sherston Court SE1 6SG
Flat 43 Sherston Court SE1 6SG
Flat 44 Sherston Court SE1 6SG
Flat 57 Sherston Court SE1 6SG
Flat 8 Sherston Court SE1 6SG
Flat 6 Sherston Court SE1 6SG
Flat 7 Sherston Court SE1 6SG
167 Brook Drive London SE11 4TG
154 Brook Drive London SE11 4TE

205 Metro Central Heights 119 Newington Causeway SE1 6BW
206 Metro Central Heights 119 Newington Causeway SE1 6BW
204 Metro Central Heights 119 Newington Causeway SE1 6BW
202 Metro Central Heights 119 Newington Causeway SE1 6BW
203 Metro Central Heights 119 Newington Causeway SE1 6BW
207 Metro Central Heights 119 Newington Causeway SE1 6BW
211 Metro Central Heights 119 Newington Causeway SE1 6BW
212 Metro Central Heights 119 Newington Causeway SE1 6BW
210 Metro Central Heights 119 Newington Causeway SE1 6BW
208 Metro Central Heights 119 Newington Causeway SE1 6BW
209 Metro Central Heights 119 Newington Causeway SE1 6BW
347 Metro Central Heights 119 Newington Causeway SE1 6DQ
348 Metro Central Heights 119 Newington Causeway SE1 6DQ
346 Metro Central Heights 119 Newington Causeway SE1 6DQ
343 Metro Central Heights 119 Newington Causeway SE1 6DQ
344 Metro Central Heights 119 Newington Causeway SE1 6DQ
349 Metro Central Heights 119 Newington Causeway SE1 6DQ
354 Metro Central Heights 119 Newington Causeway SE1 6DQ
355 Metro Central Heights 119 Newington Causeway SE1 6DQ
353 Metro Central Heights 119 Newington Causeway SE1 6DQ
350 Metro Central Heights 119 Newington Causeway SE1 6DQ
351 Metro Central Heights 119 Newington Causeway SE1 6DQ
342 Metro Central Heights 119 Newington Causeway SE1 6DQ
333 Metro Central Heights 119 Newington Causeway SE1 6DQ
334 Metro Central Heights 119 Newington Causeway SE1 6DQ
332 Metro Central Heights 119 Newington Causeway SE1 6DQ
329 Metro Central Heights 119 Newington Causeway SE1 6DQ
331 Metro Central Heights 119 Newington Causeway SE1 6DQ
335 Metro Central Heights 119 Newington Causeway SE1 6DQ
340 Metro Central Heights 119 Newington Causeway SE1 6DQ
341 Metro Central Heights 119 Newington Causeway SE1 6DQ
339 Metro Central Heights 119 Newington Causeway SE1 6DQ
336 Metro Central Heights 119 Newington Causeway SE1 6DQ
338 Metro Central Heights 119 Newington Causeway SE1 6DQ
372 Metro Central Heights 119 Newington Causeway SE1 6DX
373 Metro Central Heights 119 Newington Causeway SE1 6DX
371 Metro Central Heights 119 Newington Causeway SE1 6DX
369 Metro Central Heights 119 Newington Causeway SE1 6DX
370 Metro Central Heights 119 Newington Causeway SE1 6DX
374 Metro Central Heights 119 Newington Causeway SE1 6DX
378 Metro Central Heights 119 Newington Causeway SE1 6DX
379 Metro Central Heights 119 Newington Causeway SE1 6DX
377 Metro Central Heights 119 Newington Causeway SE1 6DX
375 Metro Central Heights 119 Newington Causeway SE1 6DX
376 Metro Central Heights 119 Newington Causeway SE1 6DX
368 Metro Central Heights 119 Newington Causeway SE1 6DX
360 Metro Central Heights 119 Newington Causeway SE1 6DQ
361 Metro Central Heights 119 Newington Causeway SE1 6DQ
358 Metro Central Heights 119 Newington Causeway SE1 6DQ
356 Metro Central Heights 119 Newington Causeway SE1 6DQ
357 Metro Central Heights 119 Newington Causeway SE1 6DQ
362 Metro Central Heights 119 Newington Causeway SE1 6DQ
366 Metro Central Heights 119 Newington Causeway SE1 6DX
367 Metro Central Heights 119 Newington Causeway SE1 6DX
365 Metro Central Heights 119 Newington Causeway SE1 6DQ
363 Metro Central Heights 119 Newington Causeway SE1 6DQ
364 Metro Central Heights 119 Newington Causeway SE1 6DQ
328 Metro Central Heights 119 Newington Causeway SE1 6DQ
295 Metro Central Heights 119 Newington Causeway SE1 6DB
296 Metro Central Heights 119 Newington Causeway SE1 6DB
294 Metro Central Heights 119 Newington Causeway SE1 6DB
291 Metro Central Heights 119 Newington Causeway SE1 6DB
293 Metro Central Heights 119 Newington Causeway SE1 6DB
297 Metro Central Heights 119 Newington Causeway SE1 6DB
302 Metro Central Heights 119 Newington Causeway SE1 6DB
303 Metro Central Heights 119 Newington Causeway SE1 6DB
301 Metro Central Heights 119 Newington Causeway SE1 6DB
298 Metro Central Heights 119 Newington Causeway SE1 6DB
300 Metro Central Heights 119 Newington Causeway SE1 6DB
290 Metro Central Heights 119 Newington Causeway SE1 6DB
281 Metro Central Heights 119 Newington Causeway SE1 6BX
282 Metro Central Heights 119 Newington Causeway SE1 6BX
280 Metro Central Heights 119 Newington Causeway SE1 6BX
278 Metro Central Heights 119 Newington Causeway SE1 6BX

156 Brook Drive London SE11 4TE
 152 Brook Drive London SE11 4TE
 148 Brook Drive London SE11 4TE
 150 Brook Drive London SE11 4TE
 160 Brook Drive London SE11 4TE
 168 Brook Drive London SE11 4TE
 170 Brook Drive London SE11 4TE
 166 Brook Drive London SE11 4TE
 162 Brook Drive London SE11 4TE
 164 Brook Drive London SE11 4TE
 146 Brook Drive London SE11 4TE
 181 Brook Drive London SE11 4TG
 183 Brook Drive London SE11 4TG
 179 Brook Drive London SE11 4TG
 169 Brook Drive London SE11 4TG
 171 Brook Drive London SE11 4TG
 185 Brook Drive London SE11 4TG
 175a Brook Drive London SE11 4TG
 175b Brook Drive London SE11 4TG
 123 Canterbury Place London SE17 3AD
 125 Canterbury Place London SE17 3AD
 121 Canterbury Place London SE17 3AD
 117 Canterbury Place London SE17 3AD
 119 Canterbury Place London SE17 3AD
 127 Canterbury Place London SE17 3AD
 59 Canterbury Place London SE17 3AD
 61 Canterbury Place London SE17 3AD
 57 Canterbury Place London SE17 3AD
 129 Canterbury Place London SE17 3AD
 131 Canterbury Place London SE17 3AD
 115 Canterbury Place London SE17 3AD
 101 Canterbury Place London SE17 3AD
 103 Canterbury Place London SE17 3AD
 111 Canterbury Place London SE17 3AD
 113 Canterbury Place London SE17 3AD
 109 Canterbury Place London SE17 3AD
 105 Canterbury Place London SE17 3AD
 107 Canterbury Place London SE17 3AD
 63 Canterbury Place London SE17 3AD
 97 Canterbury Place London SE17 3AD
 99 Canterbury Place London SE17 3AD
 95 Canterbury Place London SE17 3AD
 91 Canterbury Place London SE17 3AD
 93 Canterbury Place London SE17 3AD
 37 Hampton Street London SE17 3AN
 45 Hampton Street London SE17 3AN
 47 Hampton Street London SE17 3AN
 43 Hampton Street London SE17 3AN
 39 Hampton Street London SE17 3AN
 41 Hampton Street London SE17 3AN
 89 Canterbury Place London SE17 3AD
 71 Canterbury Place London SE17 3AD
 73 Canterbury Place London SE17 3AD
 69 Canterbury Place London SE17 3AD
 65 Canterbury Place London SE17 3AD
 67 Canterbury Place London SE17 3AD
 75 Canterbury Place London SE17 3AD
 85 Canterbury Place London SE17 3AD
 87 Canterbury Place London SE17 3AD
 83 Canterbury Place London SE17 3AD
 79 Canterbury Place London SE17 3AD
 81 Canterbury Place London SE17 3AD
 173 Brook Drive London SE11 4TG
 193 Brook Drive London SE11 4TG
 5 Dante Road London SE11 4RB
 Flat G 4 Holyoak Road SE11 4RD
 Flat H 4 Holyoak Road SE11 4RD
 1 George Mathers Road London SE11 4RU
 11 Dante Road London SE11 4RB
 13 Dante Road London SE11 4RB
 9 Dante Road London SE11 4RB
 2 George Mathers Road London SE11 4RU
 7 Dante Road London SE11 4RB
 Flat F 4 Holyoak Road SE11 4RD

279 Metro Central Heights 119 Newington Causeway SE1 6BX
 283 Metro Central Heights 119 Newington Causeway SE1 6BX
 288 Metro Central Heights 119 Newington Causeway SE1 6DB
 289 Metro Central Heights 119 Newington Causeway SE1 6DB
 287 Metro Central Heights 119 Newington Causeway SE1 6DB
 285 Metro Central Heights 119 Newington Causeway SE1 6DB
 286 Metro Central Heights 119 Newington Causeway SE1 6DB
 320 Metro Central Heights 119 Newington Causeway SE1 6DB
 321 Metro Central Heights 119 Newington Causeway SE1 6DB
 319 Metro Central Heights 119 Newington Causeway SE1 6DB
 317 Metro Central Heights 119 Newington Causeway SE1 6DB
 318 Metro Central Heights 119 Newington Causeway SE1 6DB
 322 Metro Central Heights 119 Newington Causeway SE1 6DB
 326 Metro Central Heights 119 Newington Causeway SE1 6DB
 327 Metro Central Heights 119 Newington Causeway SE1 6DQ
 325 Metro Central Heights 119 Newington Causeway SE1 6DB
 323 Metro Central Heights 119 Newington Causeway SE1 6DB
 324 Metro Central Heights 119 Newington Causeway SE1 6DB
 316 Metro Central Heights 119 Newington Causeway SE1 6DB
 308 Metro Central Heights 119 Newington Causeway SE1 6DB
 309 Metro Central Heights 119 Newington Causeway SE1 6DB
 307 Metro Central Heights 119 Newington Causeway SE1 6DB
 304 Metro Central Heights 119 Newington Causeway SE1 6DB
 305 Metro Central Heights 119 Newington Causeway SE1 6DB
 310 Metro Central Heights 119 Newington Causeway SE1 6DB
 314 Metro Central Heights 119 Newington Causeway SE1 6DB
 315 Metro Central Heights 119 Newington Causeway SE1 6DB
 313 Metro Central Heights 119 Newington Causeway SE1 6DB
 311 Metro Central Heights 119 Newington Causeway SE1 6DB
 312 Metro Central Heights 119 Newington Causeway SE1 6DB
 333 334 Part 335 And Store H Shopping Centre SE1 6TB
 Palatial Leisure Ltd Shopping Centre SE1 6TE
 253 Shopping Centre Elephant And Castle SE1 6TE
 Flat 17 Tavern Court SE1 6RY
 Part First Floor Superbowl Shopping Centre SE1 6TE
 Ninth Floor Hannibal House SE1 6TE
 Tenth Floor Hannibal House SE1 6TE
 Fifth Floor Hannibal House SE1 6TE
 200-201 Shopping Centre Elephant And Castle SE1 6TE
 The Moat Shopping Centre SE1 6TE
 Flat 16 Tavern Court SE1 6RY
 Flat 8 Tavern Court SE1 6RY
 Flat 9 Tavern Court SE1 6RY
 Flat 7 Tavern Court SE1 6RY
 Flat 5 Tavern Court SE1 6RY
 Flat 6 Tavern Court SE1 6RY
 Flat 10 Tavern Court SE1 6RY
 Flat 14 Tavern Court SE1 6RY
 Flat 15 Tavern Court SE1 6RY
 Flat 13 Tavern Court SE1 6RY
 Flat 11 Tavern Court SE1 6RY
 Flat 12 Tavern Court SE1 6RY
 Flat 5 Wellesley Court SE1 6PD
 Flat 6 Wellesley Court SE1 6PD
 Flat 4 Wellesley Court SE1 6PD
 Flat 2 Wellesley Court SE1 6PD
 Flat 3 Wellesley Court SE1 6PD
 Flat 7 Wellesley Court SE1 6PD
 Flat 3 West Combe Apartments SE1 6BN
 Flat 5 West Combe Apartments SE1 6BN
 Flat 10 Wellesley Court SE1 6PD
 Flat 8 Wellesley Court SE1 6PD
 Flat 9 Wellesley Court SE1 6PD
 Flat 1 Wellesley Court SE1 6PD
 Sixth Floor Hannibal House SE1 6TE
 Second Floor Hannibal House SE1 6TE
 Seventh Floor Hannibal House SE1 6TE
 Eleventh Floor Hannibal House SE1 6TE
 Twelfth Floor Hannibal House SE1 6TE
 Third Floor Hannibal House SE1 6TE
 Flat 4 West Combe Apartments SE1 6BN
 Flat 9 West Combe Apartments SE1 6BN
 Fourth Floor Hannibal House SE1 6TE
 Community Action Southwark Eighth Floor Hannibal House SE1

Flat J 2 Holyoak Road SE11 4RD
Flat K 2 Holyoak Road SE11 4RD
Flat I 2 Holyoak Road SE11 4RD
Flat G 2 Holyoak Road SE11 4RD
Flat H 2 Holyoak Road SE11 4RD
Flat L 2 Holyoak Road SE11 4RD
Flat D 4 Holyoak Road SE11 4RD
Flat E 4 Holyoak Road SE11 4RD
Flat C 4 Holyoak Road SE11 4RD
Flat A 4 Holyoak Road SE11 4RD
Flat B 4 Holyoak Road SE11 4RD
15 Dante Road London SE11 4RB
49 Dante Road London SE11 4RB
51 Dante Road London SE11 4RB
45 Dante Road London SE11 4RB
41 Dante Road London SE11 4RB
43 Dante Road London SE11 4RB
53 Dante Road London SE11 4RB
10 Holyoak Road London SE11 4RD
12 Holyoak Road London SE11 4RD
59 Dante Road London SE11 4RB
55 Dante Road London SE11 4RB
57 Dante Road London SE11 4RB
39 Dante Road London SE11 4RB
23 Dante Road London SE11 4RB
25 Dante Road London SE11 4RB
21 Dante Road London SE11 4RB
17 Dante Road London SE11 4RB
19 Dante Road London SE11 4RB
27 Dante Road London SE11 4RB
35 Dante Road London SE11 4RB
37 Dante Road London SE11 4RB
33 Dante Road London SE11 4RB
29 Dante Road London SE11 4RB
31 Dante Road London SE11 4RB
Apartment 1906 1 St Gabriel Walk SE1 6FB
Apartment 1907 1 St Gabriel Walk SE1 6FB
Apartment 1905 1 St Gabriel Walk SE1 6FB
Apartment 1903 1 St Gabriel Walk SE1 6FB
Apartment 1904 1 St Gabriel Walk SE1 6FB
Apartment 1908 1 St Gabriel Walk SE1 6FB
Apartment 2004 1 St Gabriel Walk SE1 6FD
Apartment 2005 1 St Gabriel Walk SE1 6FD
Apartment 2003 1 St Gabriel Walk SE1 6FD
Apartment 2001 1 St Gabriel Walk SE1 6FD
Apartment 2002 1 St Gabriel Walk SE1 6FD
Apartment 1902 1 St Gabriel Walk SE1 6FB
Apartment 1802 1 St Gabriel Walk SE1 6FB
Apartment 1803 1 St Gabriel Walk SE1 6FB
Apartment 1801 1 St Gabriel Walk SE1 6FB
Apartment 1707 1 St Gabriel Walk SE1 6FB
Apartment 1708 1 St Gabriel Walk SE1 6FB
Apartment 1804 1 St Gabriel Walk SE1 6FB
Apartment 1808 1 St Gabriel Walk SE1 6FB
Apartment 1901 1 St Gabriel Walk SE1 6FB
Apartment 1807 1 St Gabriel Walk SE1 6FB
Apartment 1805 1 St Gabriel Walk SE1 6FB
Apartment 1806 1 St Gabriel Walk SE1 6FB
Apartment 2006 1 St Gabriel Walk SE1 6FD
Apartment 2206 1 St Gabriel Walk SE1 6FD
Apartment 2207 1 St Gabriel Walk SE1 6FD
Apartment 2205 1 St Gabriel Walk SE1 6FD
Apartment 2203 1 St Gabriel Walk SE1 6FD
Apartment 2204 1 St Gabriel Walk SE1 6FD
Apartment 2208 1 St Gabriel Walk SE1 6FD
Apartment 2304 1 St Gabriel Walk SE1 6FD
Apartment 2305 1 St Gabriel Walk SE1 6FD
Apartment 2303 1 St Gabriel Walk SE1 6FD
Apartment 2301 1 St Gabriel Walk SE1 6FD
Apartment 2302 1 St Gabriel Walk SE1 6FD
Apartment 2202 1 St Gabriel Walk SE1 6FD
Apartment 2102 1 St Gabriel Walk SE1 6FD
Apartment 2103 1 St Gabriel Walk SE1 6FD

6TE

Flat 4 Tavern Court SE1 6RY
462 Metro Central Heights 119 Newington Causeway SE1 6DT
463 Metro Central Heights 119 Newington Causeway SE1 6DT
461 Metro Central Heights 119 Newington Causeway SE1 6DT
459 Metro Central Heights 119 Newington Causeway SE1 6DT
460 Metro Central Heights 119 Newington Causeway SE1 6DT
464 Metro Central Heights 119 Newington Causeway SE1 6DT
468 Metro Central Heights 119 Newington Causeway SE1 6DT
469 Metro Central Heights 119 Newington Causeway SE1 6DT
467 Metro Central Heights 119 Newington Causeway SE1 6DT
465 Metro Central Heights 119 Newington Causeway SE1 6DT
466 Metro Central Heights 119 Newington Causeway SE1 6DT
458 Metro Central Heights 119 Newington Causeway SE1 6DT
450 Metro Central Heights 119 Newington Causeway SE1 6DT
451 Metro Central Heights 119 Newington Causeway SE1 6DT
449 Metro Central Heights 119 Newington Causeway SE1 6DT
447 Metro Central Heights 119 Newington Causeway SE1 6DT
448 Metro Central Heights 119 Newington Causeway SE1 6DT
452 Metro Central Heights 119 Newington Causeway SE1 6DT
456 Metro Central Heights 119 Newington Causeway SE1 6DT
457 Metro Central Heights 119 Newington Causeway SE1 6DT
455 Metro Central Heights 119 Newington Causeway SE1 6DT
453 Metro Central Heights 119 Newington Causeway SE1 6DT
454 Metro Central Heights 119 Newington Causeway SE1 6DT
Arches 104 To 105 New Kent Road SE1 6DT
Flat 2 Tavern Court SE1 6RY
Flat 3 Tavern Court SE1 6RY
Flat 1 Tavern Court SE1 6RY
Wetherspoons Metro Central Heights SE1 6DQ
481 Metro Central Heights 119 Newington Causeway SE1 6DT
473 Metro Central Heights 119 Newington Causeway SE1 6DT
474 Metro Central Heights 119 Newington Causeway SE1 6DT
472 Metro Central Heights 119 Newington Causeway SE1 6DT
470 Metro Central Heights 119 Newington Causeway SE1 6DT
471 Metro Central Heights 119 Newington Causeway SE1 6DT
475 Metro Central Heights 119 Newington Causeway SE1 6DT
479 Metro Central Heights 119 Newington Causeway SE1 6DT
480 Metro Central Heights 119 Newington Causeway SE1 6DT
478 Metro Central Heights 119 Newington Causeway SE1 6DT
476 Metro Central Heights 119 Newington Causeway SE1 6DT
477 Metro Central Heights 119 Newington Causeway SE1 6DT
Flat 14 28 Arch Street SE1 6AS
Flat 15 28 Arch Street SE1 6AS
Flat 13 28 Arch Street SE1 6AS
Flat 11 28 Arch Street SE1 6AS
Flat 12 28 Arch Street SE1 6AS
Flat 16 28 Arch Street SE1 6AS
Unit B 28 Arch Street SE1 6AS
Unit 1 28 Arch Street SE1 6AS
Flat 17 28 Arch Street SE1 6AS
Flat 18 28 Arch Street SE1 6AS
Flat 10 28 Arch Street SE1 6AS
Flat 2 28 Arch Street SE1 6AS
Flat 3 28 Arch Street SE1 6AS
Flat 1 28 Arch Street SE1 6AS
Flat 33 26 Arch Street SE1 6AT
Unit A 26 Arch Street SE1 6AT
Flat 4 28 Arch Street SE1 6AS
Flat 8 28 Arch Street SE1 6AS
Flat 9 28 Arch Street SE1 6AS
Flat 7 28 Arch Street SE1 6AS
Flat 5 28 Arch Street SE1 6AS
Flat 6 28 Arch Street SE1 6AS
Railway Arch 4 Elephant Mews SE17 1LB
Railway Arch 5 Elephant Mews SE17 1LB
Basement Flat Brotherhood Of The Cross And Star SE1 6RT
Living Accommodation The Charlie Chaplin SE1 6TJ
Railway Arch 6 Elephant Mews SE17 1LB
Rockingham Community Day Nursery Falmouth Road SE1 6QP
Room 6 81 New Kent Road SE1 6RD
Room 7 81 New Kent Road SE1 6RD
Room 5 81 New Kent Road SE1 6RD
Room 2 81 New Kent Road SE1 6RD

Apartment 2101 1 St Gabriel Walk SE1 6FD
 Apartment 2007 1 St Gabriel Walk SE1 6FD
 Apartment 2008 1 St Gabriel Walk SE1 6FD
 Apartment 2104 1 St Gabriel Walk SE1 6FD
 Apartment 2108 1 St Gabriel Walk SE1 6FD
 Apartment 2201 1 St Gabriel Walk SE1 6FD
 Apartment 2107 1 St Gabriel Walk SE1 6FD
 Apartment 2105 1 St Gabriel Walk SE1 6FD
 Apartment 2106 1 St Gabriel Walk SE1 6FD
 Apartment 1706 1 St Gabriel Walk SE1 6FB
 Apartment 1306 1 St Gabriel Walk SE1 6FB
 Apartment 1307 1 St Gabriel Walk SE1 6FB
 Apartment 1305 1 St Gabriel Walk SE1 6FB
 Apartment 1303 1 St Gabriel Walk SE1 6FB
 Apartment 1304 1 St Gabriel Walk SE1 6FB
 Apartment 1308 1 St Gabriel Walk SE1 6FB
 Apartment 1404 1 St Gabriel Walk SE1 6FB
 Apartment 1405 1 St Gabriel Walk SE1 6FB
 Apartment 1403 1 St Gabriel Walk SE1 6FB
 Apartment 1401 1 St Gabriel Walk SE1 6FB
 Apartment 1402 1 St Gabriel Walk SE1 6FB
 Apartment 1302 1 St Gabriel Walk SE1 6FB
 Apartment 1202 1 St Gabriel Walk SE1 6FB
 Apartment 1203 1 St Gabriel Walk SE1 6FB
 Apartment 1201 1 St Gabriel Walk SE1 6FB
 Apartment 1107 1 St Gabriel Walk SE1 6FB
 Apartment 1108 1 St Gabriel Walk SE1 6FB
 Apartment 1204 1 St Gabriel Walk SE1 6FB
 Apartment 1208 1 St Gabriel Walk SE1 6FB
 Apartment 1301 1 St Gabriel Walk SE1 6FB
 Apartment 1207 1 St Gabriel Walk SE1 6FB
 Apartment 1205 1 St Gabriel Walk SE1 6FB
 Apartment 1406 1 St Gabriel Walk SE1 6FB
 Apartment 1606 1 St Gabriel Walk SE1 6FB
 Apartment 1607 1 St Gabriel Walk SE1 6FB
 Apartment 1605 1 St Gabriel Walk SE1 6FB
 Apartment 1603 1 St Gabriel Walk SE1 6FB
 Apartment 1604 1 St Gabriel Walk SE1 6FB
 Apartment 1608 1 St Gabriel Walk SE1 6FB
 Apartment 1704 1 St Gabriel Walk SE1 6FB
 Apartment 1705 1 St Gabriel Walk SE1 6FB
 Apartment 1703 1 St Gabriel Walk SE1 6FB
 Apartment 1701 1 St Gabriel Walk SE1 6FB
 Apartment 1702 1 St Gabriel Walk SE1 6FB
 Apartment 1602 1 St Gabriel Walk SE1 6FB
 Apartment 1502 1 St Gabriel Walk SE1 6FB
 Apartment 1503 1 St Gabriel Walk SE1 6FB
 Apartment 1501 1 St Gabriel Walk SE1 6FB
 Apartment 1407 1 St Gabriel Walk SE1 6FB
 Apartment 1408 1 St Gabriel Walk SE1 6FB
 Apartment 1504 1 St Gabriel Walk SE1 6FB
 Apartment 1508 1 St Gabriel Walk SE1 6FB
 Apartment 1601 1 St Gabriel Walk SE1 6FB
 Apartment 1507 1 St Gabriel Walk SE1 6FB
 Apartment 1505 1 St Gabriel Walk SE1 6FB
 Apartment 1506 1 St Gabriel Walk SE1 6FB
 19 Howell Walk London SE1 6TL
 2 Howell Walk London SE1 6TL
 18 Howell Walk London SE1 6TL
 16 Howell Walk London SE1 6TL
 17 Howell Walk London SE1 6TL
 20 Howell Walk London SE1 6TL
 28 Howell Walk London SE1 6TL
 3 Howell Walk London SE1 6TL
 26 Howell Walk London SE1 6TL
 22 Howell Walk London SE1 6TL
 24 Howell Walk London SE1 6TL
 15 Howell Walk London SE1 6TL
 92 Walworth Road London SE1 6SW
 84 Walworth Road London SE1 6SW
 4 Hampton Street London SE1 6SN
 First Floor Flat 6 Hampton Street SE1 6SN
 Draper Tenants Hall 1 Howell Walk SE1 6TL
 13 Howell Walk London SE1 6TL
 Room 3 81 New Kent Road SE1 6RD
 Room 8 81 New Kent Road SE1 6RD
 Room 9 81 New Kent Road SE1 6RD
 Flat 32 26 Arch Street SE1 6AT
 Flat 1 26 Arch Street SE1 6AT
 Flat 2 26 Arch Street SE1 6AT
 Flat 3 26 Arch Street SE1 6AT
 Flat 7 26 Arch Street SE1 6AT
 Flat 8 26 Arch Street SE1 6AT
 Flat 6 26 Arch Street SE1 6AT
 Flat 4 26 Arch Street SE1 6AT
 Flat 5 26 Arch Street SE1 6AT
 Unit 4 And Unit 5 Farrell Court SE17 1LB
 Railway Arch 110 Elephant Road SE17 1LB
 Flat 8 West Combe Apartments SE1 6BN
 Flat 6 West Combe Apartments SE1 6BN
 Flat 7 West Combe Apartments SE1 6BN
 Unit 1 5-9 Rockingham Street SE1 6PD
 Unit 2 5-9 Rockingham Street SE1 6PD
 Flat 24 26 Arch Street SE1 6AT
 Flat 25 26 Arch Street SE1 6AT
 Flat 23 26 Arch Street SE1 6AT
 Flat 21 26 Arch Street SE1 6AT
 Flat 22 26 Arch Street SE1 6AT
 Flat 26 26 Arch Street SE1 6AT
 Flat 30 26 Arch Street SE1 6AT
 Flat 31 26 Arch Street SE1 6AT
 Flat 29 26 Arch Street SE1 6AT
 Flat 27 26 Arch Street SE1 6AT
 Flat 28 26 Arch Street SE1 6AT
 Flat 20 26 Arch Street SE1 6AT
 Flat 12 26 Arch Street SE1 6AT
 Flat 13 26 Arch Street SE1 6AT
 Flat 11 26 Arch Street SE1 6AT
 Flat 9 26 Arch Street SE1 6AT
 Flat 10 26 Arch Street SE1 6AT
 Flat 14 26 Arch Street SE1 6AT
 Flat 18 26 Arch Street SE1 6AT
 Flat 19 26 Arch Street SE1 6AT
 Flat 17 26 Arch Street SE1 6AT
 Flat 15 26 Arch Street SE1 6AT
 Flat 16 26 Arch Street SE1 6AT
 446 Metro Central Heights 119 Newington Causeway SE1 6DT
 241 Shopping Centre Elephant And Castle SE1 6TE
 242-245 Shopping Centre Elephant And Castle SE1 6TE
 240 Shopping Centre Elephant And Castle SE1 6TE
 Rear 238 Shopping Centre SE1 6TE
 239 Shopping Centre Elephant And Castle SE1 6TE
 254-255 Shopping Centre Elephant And Castle SE1 6TE
 306 Shopping Centre Elephant And Castle SE1 6TB
 307 Shopping Centre Elephant And Castle SE1 6TB
 305 Shopping Centre Elephant And Castle SE1 6TB
 256-257 Shopping Centre Elephant And Castle SE1 6TE
 300-304 Shopping Centre Elephant And Castle SE1 6TB
 Front 238 Shopping Centre SE1 6TE
 218 Shopping Centre Elephant And Castle SE1 6TE
 219 Shopping Centre Elephant And Castle SE1 6TE
 214 Shopping Centre Elephant And Castle SE1 6TE
 212 Shopping Centre Elephant And Castle SE1 6TE
 213 Shopping Centre Elephant And Castle SE1 6TE
 220-221 Shopping Centre Elephant And Castle SE1 6TE
 235 Shopping Centre Elephant And Castle SE1 6TE
 236 Shopping Centre Elephant And Castle SE1 6TE
 234 Shopping Centre Elephant And Castle SE1 6TE
 222-223 Shopping Centre Elephant And Castle SE1 6TE
 232-233 Shopping Centre Elephant And Castle SE1 6TE
 329 Shopping Centre Elephant And Castle SE1 6TB
 330 Shopping Centre Elephant And Castle SE1 6TB
 325 Shopping Centre Elephant And Castle SE1 6TB
 320-322 Shopping Centre Elephant And Castle SE1 6TB
 323-324 Shopping Centre Elephant And Castle SE1 6TB
 331-332 Shopping Centre Elephant And Castle SE1 6TB
 340 Shopping Centre Elephant And Castle SE1 6TB
 340a Shopping Centre Elephant And Castle SE1 6TB

14 Howell Walk London SE1 6TL
 12 Howell Walk London SE1 6TL
 10 Howell Walk London SE1 6TL
 11 Howell Walk London SE1 6TL
 4 Howell Walk London SE1 6TL
 Flat 3 Sherston Court SE1 6SG
 Flat 37 Sherston Court SE1 6SG
 Flat 26 Sherston Court SE1 6SG
 Flat 24 Sherston Court SE1 6SG
 Flat 25 Sherston Court SE1 6SG
 Flat 38 Sherston Court SE1 6SG
 Flat 41 Sherston Court SE1 6SG
 Flat 42 Sherston Court SE1 6SG
 Flat 40 Sherston Court SE1 6SG
 Flat 39 Sherston Court SE1 6SG
 Flat 4 Sherston Court SE1 6SG
 Flat 23 Sherston Court SE1 6SG
 8 Howell Walk London SE1 6TL
 9 Howell Walk London SE1 6TL
 7 Howell Walk London SE1 6TL
 5 Howell Walk London SE1 6TL
 6 Howell Walk London SE1 6TL
 Flat 1 Sherston Court SE1 6SG
 Flat 21 Sherston Court SE1 6SG
 Flat 22 Sherston Court SE1 6SG
 Flat 20 Sherston Court SE1 6SG
 Flat 19 Sherston Court SE1 6SG
 Flat 2 Sherston Court SE1 6SG
 99 Newington Butts London SE1 6SF
 Apartment 2505 1 St Gabriel Walk SE1 6FD

Apartment 2506 1 St Gabriel Walk SE1 6FD
 Apartment 2504 1 St Gabriel Walk SE1 6FD
 Apartment 2502 1 St Gabriel Walk SE1 6FD
 Apartment 2503 1 St Gabriel Walk SE1 6FD
 Apartment 2507 1 St Gabriel Walk SE1 6FD
 Apartment 2603 1 St Gabriel Walk SE1 6FD
 Apartment 2602 1 St Gabriel Walk SE1 6FD
 Apartment 2508 1 St Gabriel Walk SE1 6FD
 Apartment 2601 1 St Gabriel Walk SE1 6FD
 Apartment 2501 1 St Gabriel Walk SE1 6FD
 Apartment 2401 1 St Gabriel Walk SE1 6FD
 Apartment 2402 1 St Gabriel Walk SE1 6FD
 Apartment 2308 1 St Gabriel Walk SE1 6FD
 Apartment 2306 1 St Gabriel Walk SE1 6FD
 Apartment 2307 1 St Gabriel Walk SE1 6FD
 Apartment 2403 1 St Gabriel Walk SE1 6FD
 Apartment 2407 1 St Gabriel Walk SE1 6FD
 Apartment 2408 1 St Gabriel Walk SE1 6FD
 Apartment 2406 1 St Gabriel Walk SE1 6FD
 Apartment 2404 1 St Gabriel Walk SE1 6FD
 Apartment 2405 1 St Gabriel Walk SE1 6FD
 Flat 401 Highline Building SE17 3AF
 115 Newington Butts London SE1 6SF
 117 Newington Butts London SE1 6SF
 113 Newington Butts London SE1 6SF
 109 Newington Butts London SE1 6SF
 111 Newington Butts London SE1 6SF
 119 Newington Butts London SE1 6SF
 127 Newington Butts London SE1 6SF
 129 Newington Butts London SE1 6SF
 125 Newington Butts London SE1 6SF
 121 Newington Butts London SE1 6SF
 123 Newington Butts London SE1 6SF
 107 Newington Butts London SE1 6SF
 4 Spare Street London SE17 3EP
 5 Spare Street London SE17 3EP
 3 Spare Street London SE17 3EP
 1 Spare Street London SE17 3EP
 2 Spare Street London SE17 3EP
 Draper Hall 44 Hampton Street SE1 6SN
 101 Newington Butts London SE1 6SF
 105 Newington Butts London SE1 6SF
 91-95 Newington Butts London SE1 6SF

339 Shopping Centre Elephant And Castle SE1 6TB
 335-336 Shopping Centre Elephant And Castle SE1 6TB
 338-339 Shopping Centre Elephant And Castle SE1 6TB
 319 Shopping Centre Elephant And Castle SE1 6TB
 310 Shopping Centre Elephant And Castle SE1 6TB
 311 Shopping Centre Elephant And Castle SE1 6TB
 309 Shopping Centre Elephant And Castle SE1 6TB
 308 Shopping Centre Elephant And Castle SE1 6TB
 Store 1 Rear Of 308 To 309 Shopping Centre SE1 6TE
 312 Shopping Centre Elephant And Castle SE1 6TB
 317 Shopping Centre Elephant And Castle SE1 6TB
 318 Shopping Centre Elephant And Castle SE1 6TB
 316 Shopping Centre Elephant And Castle SE1 6TB
 313 Shopping Centre Elephant And Castle SE1 6TB
 314-315 Shopping Centre Elephant And Castle SE1 6TB
 211 Shopping Centre Elephant And Castle SE1 6TE
 Unit 211 And 212 Shopping Centre SE1 6TE
 Unit 215 And 216 Shopping Centre SE1 6TE
 Unit 200 Shopping Centre SE1 6TE
 Store I Shopping Centre SE1 6TF
 Store T Shopping Centre SE1 6TB
 Unit 217 Shopping Centre SE1 6TE
 Unit 236 And 237 And 337 Shopping Centre SE1 6SZ
 Unit 238 Shopping Centre SE1 6TE
 Unit 234 And 235 Shopping Centre SE1 6TE
 Unit 220 To 223 Shopping Centre SE1 6TE
 Unit 231 Shopping Centre SE1 6TE
 Kiosk Shopping Centre SE1 6TB
 224 To 230 And 326 To 328 Shopping Centre SE1 6TE
 Elephant And Castle Underground Station Elephant And Castle SE1 6LW
 Part Basement Shopping Centre SE1 6TE
 Faraday Suite Part First Floor Shopping Centre SE1 6TE
 Glass Unit Coffee Point Shopping Centre SE1 6TE
 First Floor Shopping Centre SE1 6TE
 Centre Unit Shopping Centre SE1 6TE
 Workshops 1 And 6 Shopping Centre SE1 6TE
 203 Shopping Centre Elephant And Castle SE1 6TE
 Workshop 5 Shopping Centre SE1 6TE
 Workshop 3 Shopping Centre SE1 6TE
 Workshop 4 Shopping Centre SE1 6TE
 204 Shopping Centre Elephant And Castle SE1 6TE
 209 Shopping Centre Elephant And Castle SE1 6TE
 210 Shopping Centre Elephant And Castle SE1 6TE
 207-208 Shopping Centre Elephant And Castle SE1 6TE
 205 Shopping Centre Elephant And Castle SE1 6TE
 206 Shopping Centre Elephant And Castle SE1 6TE
 Workshop 2 Shopping Centre SE1 6TE
 Unit 320 Shopping Centre SE1 6TB
 Unit 321 Shopping Centre SE1 6TB
 Unit 306 And 308 Shopping Centre SE1 6TB
 Unit 250 Shopping Centre SE1 6TE
 Unit 252 Shopping Centre SE1 6TE
 Unit 322 Shopping Centre SE1 6TB
 Unit 344 Shopping Centre SE1 6TB
 Unit 352 Shopping Centre SE1 6TB
 Unit 340b Shopping Centre SE1 6TB
 Unit 333 Shopping Centre SE1 6TB
 Unit 338 Shopping Centre SE1 6TA
 415 Metro Central Heights 119 Newington Causeway SE1 6DT
 416 Metro Central Heights 119 Newington Causeway SE1 6DT
 414 Metro Central Heights 119 Newington Causeway SE1 6DT
 Flat 2 West Combe Apartments SE1 6BN
 417 Metro Central Heights 119 Newington Causeway SE1 6DT
 421 Metro Central Heights 119 Newington Causeway SE1 6DT
 422 Metro Central Heights 119 Newington Causeway SE1 6DT
 420 Metro Central Heights 119 Newington Causeway SE1 6DT
 418 Metro Central Heights 119 Newington Causeway SE1 6DT
 419 Metro Central Heights 119 Newington Causeway SE1 6DT
 Flat 1 West Combe Apartments SE1 6BN
 St Matthews At The Elephant Meadow Row SE1 6RG
 Unit 17 Shopping Centre SE1 6SZ
 237c And D238 Shopping Centre SE1 6TE
 Unit 350 Shopping Centre SE1 6TB

Unit 11 91-95 Newington Butts SE1 6SF
Unit 12 91-95 Newington Butts SE1 6SF
49 Hampton Street London SE17 3AN
Flat 41 Draper House SE1 6SX
Flat 42 Draper House SE1 6SX
Flat 40 Draper House SE1 6SX
Flat 38 Draper House SE1 6SX
Flat 39 Draper House SE1 6SX
Flat 43 Draper House SE1 6SX
Flat 47 Draper House SE1 6SX
Flat 48 Draper House SE1 6SX
Flat 46 Draper House SE1 6SX
Flat 44 Draper House SE1 6SX
Flat 45 Draper House SE1 6SX
Flat 37 Draper House SE1 6SX
Flat 29 Draper House SE1 6SX
Flat 30 Draper House SE1 6SX
Flat 28 Draper House SE1 6SX
Flat 26 Draper House SE1 6SX
Flat 27 Draper House SE1 6SX
Flat 31 Draper House SE1 6SX
Flat 35 Draper House SE1 6SX
Flat 36 Draper House SE1 6SX
Flat 34 Draper House SE1 6SX
Flat 32 Draper House SE1 6SX
Flat 33 Draper House SE1 6SX
Flat 49 Draper House SE1 6SX
Flat 65 Draper House SE1 6SX
Flat 66 Draper House SE1 6SX
Flat 64 Draper House SE1 6SX
Flat 62 Draper House SE1 6SX
Flat 63 Draper House SE1 6SX
Flat 67 Draper House SE1 6SX
Flat 71 Draper House SE1 6SY
Flat 72 Draper House SE1 6SY
Flat 70 Draper House SE1 6SX
Flat 68 Draper House SE1 6SX
Flat 69 Draper House SE1 6SX
Flat 61 Draper House SE1 6SX
Flat 53 Draper House SE1 6SX
Flat 54 Draper House SE1 6SX
Flat 52 Draper House SE1 6SX
Flat 50 Draper House SE1 6SX
Flat 51 Draper House SE1 6SX
Flat 55 Draper House SE1 6SX
Flat 59 Draper House SE1 6SX
Flat 60 Draper House SE1 6SX
Flat 58 Draper House SE1 6SX
Flat 56 Draper House SE1 6SX
Flat 57 Draper House SE1 6SX
Flat 25 Draper House SE1 6SX
Flat 92 Walworth Road SE1 6SW
1 Hampton House Hampton Street SE1 6SN
Flat H 14 Dante Road SE11 4RB
Flat H 12 Dante Road SE11 4RB
Flat H 6 Dante Road SE11 4RB
Flat 2 Draper House SE1 6SX
Flat 4 Draper House SE1 6SX
4 Hampton House Hampton Street SE1 6SN
3 Hampton House Hampton Street SE1 6SN
2 Hampton House Hampton Street SE1 6SN
Flat 3 Draper House SE1 6SX
Flat H 8 Dante Road SE11 4RB
Flat F 14 Dante Road SE11 4RB
Flat F 8 Dante Road SE11 4RB
Flat E 6 Dante Road SE11 4RB
Flat E 8 Dante Road SE11 4RB
Flat E 12 Dante Road SE11 4RB
Flat F 12 Dante Road SE11 4RB
Flat G 12 Dante Road SE11 4RB
Flat G 6 Dante Road SE11 4RB
Flat G 8 Dante Road SE11 4RB
Flat F 6 Dante Road SE11 4RB
Flat G 14 Dante Road SE11 4RB

104-124 Newington Butts London SE11 4QU
337 Shopping Centre Elephant And Castle SE1 6TE
438 Metro Central Heights 119 Newington Causeway SE1 6DT
439 Metro Central Heights 119 Newington Causeway SE1 6DT
437 Metro Central Heights 119 Newington Causeway SE1 6DT
435 Metro Central Heights 119 Newington Causeway SE1 6DT
436 Metro Central Heights 119 Newington Causeway SE1 6DT
440 Metro Central Heights 119 Newington Causeway SE1 6DT
444 Metro Central Heights 119 Newington Causeway SE1 6DT
445 Metro Central Heights 119 Newington Causeway SE1 6DT
443 Metro Central Heights 119 Newington Causeway SE1 6DT
441 Metro Central Heights 119 Newington Causeway SE1 6DT
442 Metro Central Heights 119 Newington Causeway SE1 6DT
434 Metro Central Heights 119 Newington Causeway SE1 6DT
426 Metro Central Heights 119 Newington Causeway SE1 6DT
427 Metro Central Heights 119 Newington Causeway SE1 6DT
425 Metro Central Heights 119 Newington Causeway SE1 6DT
423 Metro Central Heights 119 Newington Causeway SE1 6DT
424 Metro Central Heights 119 Newington Causeway SE1 6DT
428 Metro Central Heights 119 Newington Causeway SE1 6DT
432 Metro Central Heights 119 Newington Causeway SE1 6DT
433 Metro Central Heights 119 Newington Causeway SE1 6DT
431 Metro Central Heights 119 Newington Causeway SE1 6DT
429 Metro Central Heights 119 Newington Causeway SE1 6DT
430 Metro Central Heights 119 Newington Causeway SE1 6DT
Room 4 81 New Kent Road SE1 6RD
15 Elephant And Castle London SE1 6TB
341-343 Shopping Centre Elephant And Castle SE1 6TB
353 Shopping Centre Elephant And Castle SE1 6TB
Unit 3 Metro Central Heights SE1 6BN
Unit 4 Metro Central Heights SE1 6BN
Store Lower Ground Floor Smeaton Court SE1 6PF
Railway Arch 1 Elephant Mews SE17 1LB
Railway Arch 3 Elephant Mews SE17 1LB
237b Shopping Centre Elephant And Castle SE1 6TE
237a Shopping Centre Elephant And Castle SE1 6TE
Railway Arch 2 Elephant Mews SE17 1LB
Unit 237 To 239 Shopping Centre SE1 6TE
Unit 234 To 235 Shopping Centre SE1 6TE
Unit 211 Shopping Centre SE1 6TE
Unit 340 Shopping Centre SE1 6TB
Flat 10 Binnie House Rockingham Estate SE1 6QG
Flat 11 Binnie House Rockingham Estate SE1 6QG
Flat 1 Binnie House Rockingham Estate SE1 6QG
Flat 8 Rankine House Rockingham Estate SE1 6PL
Flat 9 Rankine House Rockingham Estate SE1 6PL
Flat 12 Binnie House Rockingham Estate SE1 6QG
Flat 16 Binnie House Rockingham Estate SE1 6QG
Flat 17 Binnie House Rockingham Estate SE1 6QG
Flat 15 Binnie House Rockingham Estate SE1 6QG
Flat 13 Binnie House Rockingham Estate SE1 6QG
Flat 14 Binnie House Rockingham Estate SE1 6QG
Flat 7 Rankine House Rockingham Estate SE1 6PL
Flat 22 Rankine House Rockingham Estate SE1 6PL
Flat 23 Rankine House Rockingham Estate SE1 6PL
Flat 21 Rankine House Rockingham Estate SE1 6PL
Flat 2 Rankine House Rockingham Estate SE1 6PL
Flat 20 Rankine House Rockingham Estate SE1 6PL
Flat 24 Rankine House Rockingham Estate SE1 6PL
Flat 5 Rankine House Rockingham Estate SE1 6PL
Flat 6 Rankine House Rockingham Estate SE1 6PL
Flat 4 Rankine House Rockingham Estate SE1 6PL
Flat 25 Rankine House Rockingham Estate SE1 6PL
Flat 3 Rankine House Rockingham Estate SE1 6PL
Flat 14 Aird House Rockingham Estate SE1 6QH
Flat 15 Aird House Rockingham Estate SE1 6QH
Flat 13 Aird House Rockingham Estate SE1 6QH
Flat 11 Aird House Rockingham Estate SE1 6QH
Flat 12 Aird House Rockingham Estate SE1 6QH
Flat 16 Aird House Rockingham Estate SE1 6QH
Flat 2 Aird House Rockingham Estate SE1 6QH
Flat 20 Aird House Rockingham Estate SE1 6QH
Flat 19 Aird House Rockingham Estate SE1 6QH
Flat 17 Aird House Rockingham Estate SE1 6QH

Flat 5 Draper House SE1 6SX
Flat 17 Draper House SE1 6SX
Flat 18 Draper House SE1 6SX
Flat 16 Draper House SE1 6SX
Flat 14 Draper House SE1 6SX
Flat 15 Draper House SE1 6SX
Flat 19 Draper House SE1 6SX
Flat 23 Draper House SE1 6SX
Flat 24 Draper House SE1 6SX
Flat 22 Draper House SE1 6SX
Flat 20 Draper House SE1 6SX
Flat 21 Draper House SE1 6SX
Flat 13 Draper House SE1 6SX
Flat 7 Draper House SE1 6SX
7 Hampton House Hampton Street SE1 6SN
6 Hampton House Hampton Street SE1 6SN
5 Hampton House Hampton Street SE1 6SN
Flat 6 Draper House SE1 6SX
Flat 8 Draper House SE1 6SX
Flat 11 Draper House SE1 6SX
Flat 12 Draper House SE1 6SX
Flat 10 Draper House SE1 6SX
8 Hampton House Hampton Street SE1 6SN
Flat 9 Draper House SE1 6SX
Flat 136 Draper House SE1 6SY
Flat 137 Draper House SE1 6SY
Flat 135 Draper House SE1 6SY
Flat 133 Draper House SE1 6SY
Flat 134 Draper House SE1 6SY
Flat 138 Draper House SE1 6SY
Arch 146 8 Hampton Street SE1 6SN
Arch 147 8 Hampton Street SE1 6SN
Flat 141 Draper House SE1 6SY
Flat 139 Draper House SE1 6SY
Flat 140 Draper House SE1 6SY
Flat 132 Draper House SE1 6SY
Flat 124 Draper House SE1 6SY
Flat 125 Draper House SE1 6SY
Flat 123 Draper House SE1 6SY
Flat 121 Draper House SE1 6SY
Flat 122 Draper House SE1 6SY
Flat 126 Draper House SE1 6SY
Flat 130 Draper House SE1 6SY
Flat 131 Draper House SE1 6SY
Flat 129 Draper House SE1 6SY
Flat 127 Draper House SE1 6SY
Flat 128 Draper House SE1 6SY
Arch 148 10-12 Hampton Street SE1 6SN
Store 72 Winchester Close SE17 3DH
Store 37 Winchester Close SE17 3DQ
Arch 149 10-12 Hampton Street SE1 6SN
Arch 144 Eagle Yard SE1 6SP
Railway Arch 145 Eagle Yard SE1 6SW
Flat 120 Draper House SE1 6SY
Flat 88 Draper House SE1 6SY
Flat 89 Draper House SE1 6SY
Flat 87 Draper House SE1 6SY
Flat 85 Draper House SE1 6SY
Flat 86 Draper House SE1 6SY
Flat 90 Draper House SE1 6SY
Flat 94 Draper House SE1 6SY
Flat 95 Draper House SE1 6SY
Flat 93 Draper House SE1 6SY
Flat 91 Draper House SE1 6SY
Flat 92 Draper House SE1 6SY
Flat 84 Draper House SE1 6SY
Flat 76 Draper House SE1 6SY
Flat 77 Draper House SE1 6SY
Flat 75 Draper House SE1 6SY
Flat 73 Draper House SE1 6SY
Flat 74 Draper House SE1 6SY
Flat 78 Draper House SE1 6SY
Flat 82 Draper House SE1 6SY
Flat 83 Draper House SE1 6SY

Flat 18 Aird House Rockingham Estate SE1 6QH
Flat 10 Aird House Rockingham Estate SE1 6QH
Flat 3 Binnie House Rockingham Estate SE1 6QG
Flat 4 Binnie House Rockingham Estate SE1 6QG
Flat 2 Binnie House Rockingham Estate SE1 6QG
Flat 18 Binnie House Rockingham Estate SE1 6QG
Flat 19 Binnie House Rockingham Estate SE1 6QG
Flat 5 Binnie House Rockingham Estate SE1 6QG
Flat 9 Binnie House Rockingham Estate SE1 6QG
Flat 1 Aird House Rockingham Estate SE1 6QH
Flat 8 Binnie House Rockingham Estate SE1 6QG
Flat 6 Binnie House Rockingham Estate SE1 6QG
Flat 7 Binnie House Rockingham Estate SE1 6QG
Flat 19 Rankine House Rockingham Estate SE1 6PL
Flat 6 Varley House Rockingham Estate SE1 6AL
Flat 7 Varley House Rockingham Estate SE1 6AL
Flat 5 Varley House Rockingham Estate SE1 6AL
Flat 3 Varley House Rockingham Estate SE1 6AL
Flat 4 Varley House Rockingham Estate SE1 6AL
Flat 8 Varley House Rockingham Estate SE1 6AL
Flat 11 Cartwright House Rockingham Estate SE1 6AN
Flat 12 Cartwright House Rockingham Estate SE1 6AN
Flat 10 Cartwright House Rockingham Estate SE1 6AN
Flat 9 Varley House Rockingham Estate SE1 6AL
Flat 1 Cartwright House Rockingham Estate SE1 6AN
Flat 2 Varley House Rockingham Estate SE1 6AL
86 Rockingham Street London SE1 6PG
88 Rockingham Street London SE1 6PG
84 Rockingham Street London SE1 6PG
80 Rockingham Street London SE1 6PG
82 Rockingham Street London SE1 6PG
90 Rockingham Street London SE1 6PG
98 Rockingham Street London SE1 6PG
Flat 1 Varley House Rockingham Estate SE1 6AL
96 Rockingham Street London SE1 6PG
92 Rockingham Street London SE1 6PG
94 Rockingham Street London SE1 6PG
Flat 11 Rankine House Rockingham Estate SE1 6PL
Flat 12 Rankine House Rockingham Estate SE1 6PL
Flat 10 Rankine House Rockingham Estate SE1 6PL
42a Tarn Street London SE1 6PE
Flat 1 Rankine House Rockingham Estate SE1 6PL
Flat 13 Rankine House Rockingham Estate SE1 6PL
Flat 17 Rankine House Rockingham Estate SE1 6PL
Flat 18 Rankine House Rockingham Estate SE1 6PL
Flat 16 Rankine House Rockingham Estate SE1 6PL
Flat 14 Rankine House Rockingham Estate SE1 6PL
Flat 15 Rankine House Rockingham Estate SE1 6PL
Flat 9 Cartwright House Rockingham Estate SE1 6AN
Flat 16 Cartwright House Rockingham Estate SE1 6AN
Flat 2 Cartwright House Rockingham Estate SE1 6AN
Flat 15 Cartwright House Rockingham Estate SE1 6AN
Flat 13 Cartwright House Rockingham Estate SE1 6AN
Flat 14 Cartwright House Rockingham Estate SE1 6AN
Flat 3 Cartwright House Rockingham Estate SE1 6AN
Flat 7 Cartwright House Rockingham Estate SE1 6AN
Flat 8 Cartwright House Rockingham Estate SE1 6AN
Flat 6 Cartwright House Rockingham Estate SE1 6AN
Flat 4 Cartwright House Rockingham Estate SE1 6AN
Flat 5 Cartwright House Rockingham Estate SE1 6AN
Flat 10 Banks House Rockingham Estate SE1 6QQ
Flat 11 Banks House Rockingham Estate SE1 6QQ
Flat 1 Banks House Rockingham Estate SE1 6QQ
Flat 8 Martin House Rockingham Estate SE1 6QP
Flat 9 Martin House Rockingham Estate SE1 6QP
Flat 12 Banks House Rockingham Estate SE1 6QQ
Flat 16 Banks House Rockingham Estate SE1 6QQ
Flat 17 Banks House Rockingham Estate SE1 6QQ
Flat 15 Banks House Rockingham Estate SE1 6QQ
Flat 13 Banks House Rockingham Estate SE1 6QQ
Flat 14 Banks House Rockingham Estate SE1 6QQ
Flat 7 Martin House Rockingham Estate SE1 6QP
Flat 49 Martin House Rockingham Estate SE1 6QP
Flat 5 Martin House Rockingham Estate SE1 6QP

26 Winchester Close London SE17 3DH
 30 Marlborough Close London SE17 3AP
 32 Marlborough Close London SE17 3AP
 28 Marlborough Close London SE17 3AP
 24 Marlborough Close London SE17 3AP
 26 Marlborough Close London SE17 3AP
 34 Marlborough Close London SE17 3AP
 8 Marlborough Close London SE17 3AP
 1 Marlborough Close London SE17 3AW
 6 Marlborough Close London SE17 3AP
 36 Marlborough Close London SE17 3AP
 4 Marlborough Close London SE17 3AP
 22 Marlborough Close London SE17 3AP
 57 Hampton Street London SE17 3AN
 10 Marlborough Close London SE17 3AP
 55 Hampton Street London SE17 3AN
 51 Hampton Street London SE17 3AN
 53 Hampton Street London SE17 3AN
 12 Marlborough Close London SE17 3AP
 2 Marlborough Close London SE17 3AP
 20 Marlborough Close London SE17 3AP
 18 Marlborough Close London SE17 3AP
 14 Marlborough Close London SE17 3AP
 16 Marlborough Close London SE17 3AP
 11 Marlborough Close London SE17 3AW
 12 Winchester Close London SE17 3DH
 14 Winchester Close London SE17 3DH
 102 Winchester Close London SE17 3DH
 10 Winchester Close London SE17 3DH
 100 Winchester Close London SE17 3DH
 16 Winchester Close London SE17 3DH
 22 Winchester Close London SE17 3DH
 24 Winchester Close London SE17 3DH
 20 Winchester Close London SE17 3DH
 18 Winchester Close London SE17 3DH
 2 Winchester Close London SE17 3DH
 9 Marlborough Close London SE17 3AW
 19 Marlborough Close London SE17 3AW
 21 Marlborough Close London SE17 3AW
 17 Marlborough Close London SE17 3AW
 13 Marlborough Close London SE17 3AW
 15 Marlborough Close London SE17 3AW
 23 Marlborough Close London SE17 3AW
 5 Marlborough Close London SE17 3AW
 7 Marlborough Close London SE17 3AW
 3 Marlborough Close London SE17 3AW
 25 Marlborough Close London SE17 3AW
 27 Marlborough Close London SE17 3AW
 Flat 12 88 Walworth Road SE1 6SW
 Flat 13 88 Walworth Road SE1 6SW
 Flat 11 88 Walworth Road SE1 6SW
 Flat 1 88 Walworth Road SE1 6SW
 Flat 10 88 Walworth Road SE1 6SW
 Flat 14 88 Walworth Road SE1 6SW
 Flat 5 88 Walworth Road SE1 6SW
 Flat 6 88 Walworth Road SE1 6SW
 Flat 4 88 Walworth Road SE1 6SW
 Flat 2 88 Walworth Road SE1 6SW
 Flat 3 88 Walworth Road SE1 6SW
 Flat 7 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 8 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 6 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 4 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 5 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 9 Lucy Ashe House Newington Estate SE17 3DJ
 165a Brook Drive London SE11 4TG
 82 Walworth Road London SE1 6SW
 15 Hampton Street London SE17 3AN
 Hampton Court Palace 35 Hampton Street SE17 3AN
 20 Steedman Street London SE17 3AF
 Flat 7 88 Walworth Road SE1 6SW
 Flat C 12 Dante Road SE11 4RB
 Flat C 6 Dante Road SE11 4RB
 Flat C 10 Dante Road SE11 4RB

Flat 32 Martin House Rockingham Estate SE1 6QP
 Flat 33 Martin House Rockingham Estate SE1 6QP
 Flat 31 Martin House Rockingham Estate SE1 6QP
 Flat 3 Martin House Rockingham Estate SE1 6QP
 Flat 30 Martin House Rockingham Estate SE1 6QP
 78 Rockingham Street London SE1 6PG
 Unit 3 The Artworks SE17 1AY
 Unit 4 The Artworks SE17 1AY
 Unit 2 The Artworks SE17 1AY
 Unit 1 The Artworks SE17 1AY
 Unit 5 The Artworks SE17 1AY
 Unit 9 The Artworks SE17 1AY
 Unit 10 The Artworks SE17 1AY
 Unit 8 The Artworks SE17 1AY
 Unit 6 The Artworks SE17 1AY
 Unit 7 The Artworks SE17 1AY
 Unit 1 3 Elephant Road SE1 1LB
 Flat 14 Melbway House SE1 6BF
 Flat 15 Melbway House SE1 6BF
 Flat 13 Melbway House SE1 6BF
 Flat 11 Melbway House SE1 6BF
 Flat 12 Melbway House SE1 6BF
 Flat 16 Melbway House SE1 6BF
 Unit 3a Shopping Centre SE1 6TE
 Flat 19 Melbway House SE1 6BF
 Flat 17 Melbway House SE1 6BF
 Flat 18 Melbway House SE1 6BF
 Container C5 Shopping Centre SE1 6TE
 Container C6 Shopping Centre SE1 6TE
 Container C4 Shopping Centre SE1 6TE
 Container C2 Shopping Centre SE1 6TE
 Container C3 Shopping Centre SE1 6TE
 Container C7 Shopping Centre SE1 6TE
 Container C11 Shopping Centre SE1 6TE
 Container C12 Shopping Centre SE1 6TE
 Container C10 Shopping Centre SE1 6TE
 Container C8 Shopping Centre SE1 6TE
 Container C9 Shopping Centre SE1 6TE
 Container C1 Shopping Centre SE1 6TE
 Unit 14 The Artworks SE17 1AY
 Unit 15 The Artworks SE17 1AY
 Unit 13 The Artworks SE17 1AY
 Unit 11 The Artworks SE17 1AY
 Unit 12 The Artworks SE17 1AY
 Unit 16 The Artworks SE17 1AY
 Unit 20 The Artworks SE17 1AY
 Unit 21 The Artworks SE17 1AY
 Unit 19 The Artworks SE17 1AY
 Unit 17 The Artworks SE17 1AY
 Unit 18 The Artworks SE17 1AY
 Flat 10 Melbway House SE1 6BF
 Unit I Seventh Floor Hannibal House SE1 6TE
 Unit J Seventh Floor Hannibal House SE1 6TE
 Unit H Seventh Floor Hannibal House SE1 6TE
 Unit F Seventh Floor Hannibal House SE1 6TE
 Unit G Seventh Floor Hannibal House SE1 6TE
 Unit K Seventh Floor Hannibal House SE1 6TE
 Unit O Seventh Floor Hannibal House SE1 6TE
 Unit P Seventh Floor Hannibal House SE1 6TE
 Unit N Seventh Floor Hannibal House SE1 6TE
 Unit L Seventh Floor Hannibal House SE1 6TE
 Unit M Seventh Floor Hannibal House SE1 6TE
 Unit E Seventh Floor Hannibal House SE1 6TE
 Flat 34 26 Arch Street SE1 6AT
 Site Office Elephant Road SE1 6TW
 Unit C Seventh Floor Hannibal House SE1 6TE
 Unit D Seventh Floor Hannibal House SE1 6TE
 Unit B Seventh Floor Hannibal House SE1 6TE
 Unit A Seventh Floor Hannibal House SE1 6TE
 Flat 2 Melbway House SE1 6BF
 Flat 3 Melbway House SE1 6BF
 Flat 1 Melbway House SE1 6BF
 202 Shopping Centre SE1 6TE
 Flat 4 Melbway House SE1 6BF

Flat C 14 Dante Road SE11 4RB
 Flat C 8 Dante Road SE11 4RB
 Flat D 14 Dante Road SE11 4RB
 Flat D 6 Dante Road SE11 4RB
 Flat E 14 Dante Road SE11 4RB
 Flat D 12 Dante Road SE11 4RB
 Flat D 8 Dante Road SE11 4RB
 Flat D 10 Dante Road SE11 4RB
 Flat B 6 Dante Road SE11 4RB
 Flat A 12 Dante Road SE11 4RB
 Flat A 14 Dante Road SE11 4RB
 Flat A 10 Dante Road SE11 4RB
 Flat 8 88 Walworth Road SE1 6SW
 Flat 9 88 Walworth Road SE1 6SW
 Flat A 6 Dante Road SE11 4RB
 Flat B 12 Dante Road SE11 4RB
 Flat B 14 Dante Road SE11 4RB
 Flat B 10 Dante Road SE11 4RB
 Flat A 8 Dante Road SE11 4RB
 Flat B 8 Dante Road SE11 4RB
 Flat 3 Lucy Ashe House Newington Estate SE17 3DJ
 51 Winchester Close London SE17 3DQ
 53 Winchester Close London SE17 3DQ
 5 Winchester Close London SE17 3DQ
 47 Winchester Close London SE17 3DQ
 49 Winchester Close London SE17 3DQ
 55 Winchester Close London SE17 3DQ
 63 Winchester Close London SE17 3DQ
 65 Winchester Close London SE17 3DQ
 61 Winchester Close London SE17 3DQ
 57 Winchester Close London SE17 3DQ
 59 Winchester Close London SE17 3DQ
 45 Winchester Close London SE17 3DQ
 3 Winchester Close London SE17 3DQ
 31 Winchester Close London SE17 3DQ
 29 Winchester Close London SE17 3DQ
 25 Winchester Close London SE17 3DQ
 27 Winchester Close London SE17 3DQ
 33 Winchester Close London SE17 3DQ
 41 Winchester Close London SE17 3DQ
 43 Winchester Close London SE17 3DQ
 39 Winchester Close London SE17 3DQ
 35 Winchester Close London SE17 3DQ
 37 Winchester Close London SE17 3DQ
 67 Winchester Close London SE17 3DQ
 Flat 14 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 15 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 13 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 11 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 12 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 16 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 2 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 20 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 19 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 17 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 18 Lucy Ashe House Newington Estate SE17 3DJ
 Flat 10 Lucy Ashe House Newington Estate SE17 3DJ
 73 Winchester Close London SE17 3DQ
 75 Winchester Close London SE17 3DQ
 71 Winchester Close London SE17 3DQ
 69 Winchester Close London SE17 3DQ
 7 Winchester Close London SE17 3DQ
 77 Winchester Close London SE17 3DQ
 9 Winchester Close London SE17 3DQ
 Flat 1 Lucy Ashe House Newington Estate SE17 3DJ
 83 Winchester Close London SE17 3DQ
 79 Winchester Close London SE17 3DQ
 81 Winchester Close London SE17 3DQ
 Apartment 1108 8 Walworth Road SE1 6EG
 Apartment 1109 8 Walworth Road SE1 6EG
 Apartment 1107 8 Walworth Road SE1 6EG
 Apartment 1105 8 Walworth Road SE1 6EG
 Apartment 1106 8 Walworth Road SE1 6EG
 Apartment 1110 8 Walworth Road SE1 6EG
 Flat 8 Melbway House SE1 6BF
 Flat 9 Melbway House SE1 6BF
 Flat 7 Melbway House SE1 6BF
 Flat 5 Melbway House SE1 6BF
 Flat 6 Melbway House SE1 6BF
 Crossway United Reform Church 100 New Kent Road SE1 6TU
 Unit T Seventh Floor Hannibal House SE1 6TE
 Unit U Seventh Floor Hannibal House SE1 6TE
 Unit S Seventh Floor Hannibal House SE1 6TE
 Unit Q Seventh Floor Hannibal House SE1 6TE
 Unit R Seventh Floor Hannibal House SE1 6TE
 Unit V Seventh Floor Hannibal House SE1 6TE
 Unit Z Seventh Floor Hannibal House SE1 6TE
 Unit 1 Metro Central Heights SE1 6BN
 Unit Y Seventh Floor Hannibal House SE1 6TE
 Unit W Seventh Floor Hannibal House SE1 6TE
 Unit X Seventh Floor Hannibal House SE1 6TE
 Unit 35 The Artworks SE17 1AY
 Unit 36 The Artworks SE17 1AY
 Unit 34 The Artworks SE17 1AY
 Unit 32 The Artworks SE17 1AY
 Unit 33 The Artworks SE17 1AY
 Unit 37 The Artworks SE17 1AY
 Unit 41 The Artworks SE17 1AY
 Unit 42 The Artworks SE17 1AY
 Unit 40 The Artworks SE17 1AY
 Unit 38 The Artworks SE17 1AY
 Unit 39 The Artworks SE17 1AY
 Unit 31 The Artworks SE17 1AY
 Unit 23 The Artworks SE17 1AY
 Unit 24 The Artworks SE17 1AY
 Unit 22 The Artworks SE17 1AY
 Unit 15 Shopping Centre SE17 1AY
 Unit 25 The Artworks SE17 1AY
 Unit 29 The Artworks SE17 1AY
 Unit 30 The Artworks SE17 1AY
 Unit 28 The Artworks SE17 1AY
 Unit 26 The Artworks SE17 1AY
 Unit 27 The Artworks SE17 1AY
 62 Rockingham Street London SE1 6PG
 64 Rockingham Street London SE1 6PG
 60 Rockingham Street London SE1 6PG
 56 Rockingham Street London SE1 6PG
 58 Rockingham Street London SE1 6PG
 66 Rockingham Street London SE1 6PG
 74 Rockingham Street London SE1 6PG
 76 Rockingham Street London SE1 6PG
 72 Rockingham Street London SE1 6PG
 68 Rockingham Street London SE1 6PG
 70 Rockingham Street London SE1 6PG
 108 Rockingham Street London SE1 6PG
 7 Elephant Road London SE17 1LB
 Railway Arch 113 Elephant Road SE17 1LB
 Unit 43 The Artworks SE17 1AY
 133c Elephant Road London SE17 1LB
 104 Rockingham Street London SE1 6PG
 106 Rockingham Street London SE1 6PG
 102 Rockingham Street London SE1 6PG
 100 Rockingham Street London SE1 6PG
 Pitch 46 Shopping Centre SE1 6TE
 Pitch 13 Shopping Centre SE1 6TE
 Pitch 14 Shopping Centre SE1 6TE
 Pitch 12 Shopping Centre SE1 6TE
 Pitch 10 Shopping Centre SE1 6TE
 Pitch 11 Shopping Centre SE1 6TE
 Pitch 15 Shopping Centre SE1 6TE
 Pitch 19 Shopping Centre SE1 6TE
 Pitch 20 Shopping Centre SE1 6TE
 Pitch 18 Shopping Centre SE1 6TE
 Pitch 16 And C11 Shopping Centre SE1 6TE
 Pitch 17 Shopping Centre SE1 6TE
 Pitch 9 Shopping Centre SE1 6TE
 Pitch 1 Shopping Centre SE1 6TE
 Pitch 2 Shopping Centre SE1 6TE

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| Apartment 1203 8 Walworth Road SE1 6EG | Container C15 Shopping Centre SE1 6TE |
| Apartment 1204 8 Walworth Road SE1 6EG | Container C13 Shopping Centre SE1 6TE |
| Apartment 1202 8 Walworth Road SE1 6EG | Container C14 Shopping Centre SE1 6TE |
| Apartment 1111 8 Walworth Road SE1 6EG | Pitch 3 Shopping Centre SE1 6TE |
| Apartment 1201 8 Walworth Road SE1 6EG | Pitch 7 Shopping Centre SE1 6TE |
| Apartment 1104 8 Walworth Road SE1 6EG | Pitch 8 Shopping Centre SE1 6TE |
| Apartment 1006 8 Walworth Road SE1 6EE | Pitch 6 Shopping Centre SE1 6TE |
| Apartment 1007 8 Walworth Road SE1 6EE | Pitch 4 Shopping Centre SE1 6TE |
| Apartment 1005 8 Walworth Road SE1 6EE | Pitch 5 Shopping Centre SE1 6TE |
| Apartment 1003 8 Walworth Road SE1 6EE | Pitch 38 Shopping Centre SE1 6TE |
| Apartment 1004 8 Walworth Road SE1 6EE | Pitch 39 Shopping Centre SE1 6TE |
| Apartment 1008 8 Walworth Road SE1 6EE | Pitch 37 Shopping Centre SE1 6TE |
| Apartment 1102 8 Walworth Road SE1 6EG | Pitch 35 Shopping Centre SE1 6TE |
| Apartment 1103 8 Walworth Road SE1 6EG | Pitch 36 Shopping Centre SE1 6TE |
| Apartment 1101 8 Walworth Road SE1 6EG | Pitch 40 Shopping Centre SE1 6TE |
| Apartment 1009 8 Walworth Road SE1 6EE | Pitch 44 Shopping Centre SE1 6TE |
| Apartment 1010 8 Walworth Road SE1 6EE | Pitch 45 Shopping Centre SE1 6TE |
| Apartment 1205 8 Walworth Road SE1 6EG | Pitch 43 Shopping Centre SE1 6TE |
| Apartment 1310 8 Walworth Road SE1 6EG | Pitch 41 Shopping Centre SE1 6TE |
| Apartment 1311 8 Walworth Road SE1 6EG | Pitch 42 Shopping Centre SE1 6TE |
| Apartment 1309 8 Walworth Road SE1 6EG | Pitch 34 Shopping Centre SE1 6TE |
| Apartment 1307 8 Walworth Road SE1 6EG | Pitch 24 Shopping Centre SE1 6TE |
| Apartment 1308 8 Walworth Road SE1 6EG | Pitch 25 Shopping Centre SE1 6TE |
| Apartment 1401 8 Walworth Road SE1 6EG | Pitch 23 Shopping Centre SE1 6TE |
| Apartment 1405 8 Walworth Road SE1 6EG | Pitch 21 Shopping Centre SE1 6TE |
| Apartment 1406 8 Walworth Road SE1 6EG | Pitch 22 Shopping Centre SE1 6TE |
| Apartment 1404 8 Walworth Road SE1 6EG | Pitch 26 Shopping Centre SE1 6TE |
| Apartment 1402 8 Walworth Road SE1 6EG | Pitch 30 And 31 Shopping Centre SE1 6TE |
| Apartment 1403 8 Walworth Road SE1 6EG | Pitch 32 And 33 Shopping Centre SE1 6TE |
| Apartment 1306 8 Walworth Road SE1 6EG | Pitch 29 Shopping Centre SE1 6TE |
| Apartment 1209 8 Walworth Road SE1 6EG | Pitch 27 Shopping Centre SE1 6TE |
| Apartment 1210 8 Walworth Road SE1 6EG | Pitch 28 Shopping Centre SE1 6TE |
| Apartment 1208 8 Walworth Road SE1 6EG | By Email |
| Apartment 1206 8 Walworth Road SE1 6EG | By Email |
| Apartment 1207 8 Walworth Road SE1 6EG | By Email |
| Apartment 1211 8 Walworth Road SE1 6EG | By Email |
| Apartment 1304 8 Walworth Road SE1 6EG | By Email |
| Apartment 1305 8 Walworth Road SE1 6EG | By Email |
| Apartment 1303 8 Walworth Road SE1 6EG | By Email |
| Apartment 1301 8 Walworth Road SE1 6EG | By Email |
| Apartment 1302 8 Walworth Road SE1 6EG | By Email |
| Apartment 1002 8 Walworth Road SE1 6EE | By Email |
| Apartment 610 8 Walworth Road SE1 6EE | By Email |
| Apartment 701 8 Walworth Road SE1 6EE | By Email |
| Apartment 609 8 Walworth Road SE1 6EE | By Email |
| Apartment 607 8 Walworth Road SE1 6EE | 28 Sutherland Square SE17 3EQ |
| Apartment 608 8 Walworth Road SE1 6EE | First Floor Flat 110 Brook Drive SE11 4TQ |
| Apartment 702 8 Walworth Road SE1 6EE | Second Floor Flat 110 Brook Drive SE11 4TQ |
| Apartment 706 8 Walworth Road SE1 6EE | Flat 1 120 Brook Drive SE11 4TQ |
| Apartment 707 8 Walworth Road SE1 6EE | Flat 2 120 Brook Drive SE11 4TQ |
| Apartment 705 8 Walworth Road SE1 6EE | Flat 3 120 Brook Drive SE11 4TQ |
| Apartment 703 8 Walworth Road SE1 6EE | Flat A 108 Brook Drive SE11 4TQ |
| Apartment 704 8 Walworth Road SE1 6EE | Flat A 112 Brook Drive SE11 4TQ |
| Apartment 606 8 Walworth Road SE1 6EE | Flat A 114 Brook Drive SE11 4TQ |
| Apartment 508 8 Walworth Road SE1 6EE | Flat B 108 Brook Drive SE11 4TQ |
| Apartment 509 8 Walworth Road SE1 6EE | Flat B 112 Brook Drive SE11 4TQ |
| Apartment 507 8 Walworth Road SE1 6EE | Flat C 108 Brook Drive SE11 4TQ |
| Apartment 505 8 Walworth Road SE1 6EE | Ground Floor 114 Brook Drive SE11 4TQ |
| Apartment 506 8 Walworth Road SE1 6EE | Ground Floor Flat 110 Brook Drive SE11 4TQ |
| Apartment 510 8 Walworth Road SE1 6EE | Ground Floor Flat 112 Brook Drive SE11 4TQ |
| Apartment 604 8 Walworth Road SE1 6EE | 116 Brook Drive London SE11 4TQ |
| Apartment 605 8 Walworth Road SE1 6EE | 118 Brook Drive London SE11 4TQ |
| Apartment 603 8 Walworth Road SE1 6EE | 122 Brook Drive London SE11 4TQ |
| Apartment 601 8 Walworth Road SE1 6EE | 124 Brook Drive London SE11 4TQ |
| Apartment 602 8 Walworth Road SE1 6EE | 126 Brook Drive London SE11 4TE |
| Apartment 708 8 Walworth Road SE1 6EE | 128 Brook Drive London SE11 4TE |
| Apartment 904 8 Walworth Road SE1 6EE | 130 Brook Drive London SE11 4TE |
| Apartment 905 8 Walworth Road SE1 6EE | 132 Brook Drive London SE11 4TE |
| Apartment 903 8 Walworth Road SE1 6EE | 134 Brook Drive London SE11 4TE |
| Apartment 901 8 Walworth Road SE1 6EE | 136 Brook Drive London SE11 4TE |
| Apartment 902 8 Walworth Road SE1 6EE | 138 Brook Drive London SE11 4TE |
| Apartment 906 8 Walworth Road SE1 6EE | 126a Brook Drive London SE11 4TE |
| Apartment 910 8 Walworth Road SE1 6EE | 130a Brook Drive London SE11 4TE |
| Apartment 1001 8 Walworth Road SE1 6EE | 132a Brook Drive London SE11 4TE |

Apartment 1507 8 Walworth Road SE1 6EG
Apartment 1410 8 Walworth Road SE1 6EG
Apartment 1411 8 Walworth Road SE1 6EG
Apartment 1409 8 Walworth Road SE1 6EG
Apartment 1407 8 Walworth Road SE1 6EG
Apartment 1408 8 Walworth Road SE1 6EG
Apartment 1501 8 Walworth Road SE1 6EG
Apartment 1505 8 Walworth Road SE1 6EG
Apartment 1506 8 Walworth Road SE1 6EG
Apartment 1504 8 Walworth Road SE1 6EG
Apartment 1502 8 Walworth Road SE1 6EG
Apartment 1503 8 Walworth Road SE1 6EG
Apartment 1609 8 Walworth Road SE1 6EG
Apartment 1803 8 Walworth Road SE1 6EG
Apartment 1804 8 Walworth Road SE1 6EG
Apartment 1802 8 Walworth Road SE1 6EG
Apartment 1711 8 Walworth Road SE1 6EG
Apartment 1801 8 Walworth Road SE1 6EG
Apartment 1805 8 Walworth Road SE1 6EG
Apartment 1809 8 Walworth Road SE1 6EG
Apartment 1810 8 Walworth Road SE1 6EG
Apartment 1808 8 Walworth Road SE1 6EG
Apartment 1806 8 Walworth Road SE1 6EG
Apartment 1807 8 Walworth Road SE1 6EG
Apartment 1710 8 Walworth Road SE1 6EG
Apartment 1702 8 Walworth Road SE1 6EG
Apartment 1703 8 Walworth Road SE1 6EG
Apartment 1701 8 Walworth Road SE1 6EG
Apartment 1610 8 Walworth Road SE1 6EG
Apartment 1611 8 Walworth Road SE1 6EG
Apartment 1704 8 Walworth Road SE1 6EG
Apartment 1708 8 Walworth Road SE1 6EG
Apartment 1709 8 Walworth Road SE1 6EG
Apartment 1707 8 Walworth Road SE1 6EG
Apartment 1705 8 Walworth Road SE1 6EG
Apartment 1706 8 Walworth Road SE1 6EG
1 Hampton Street London SE17 3AL
6 Steedman Street London SE17 3AF
Large Arch 3 Hampton Street SE17 3AL
92a Walworth Road London SE1 6SW
Parking Bays 9 6 Steedman Street SE17 3AF
Parking Bays 2 6 Steedman Street SE17 3AF
4 Steedman Street London SE17 3AF
504 Julian Markham House 114 Walworth Road SE17 1JL
505 Julian Markham House 114 Walworth Road SE17 1JL
503 Julian Markham House 114 Walworth Road SE17 1JL
607 Julian Markham House 114 Walworth Road SE17 1JL
502 Julian Markham House 114 Walworth Road SE17 1JL
506 Julian Markham House 114 Walworth Road SE17 1JL
703 Julian Markham House 114 Walworth Road SE17 1JL
704 Julian Markham House 114 Walworth Road SE17 1JL
702 Julian Markham House 114 Walworth Road SE17 1JL
507 Julian Markham House 114 Walworth Road SE17 1JL
701 Julian Markham House 114 Walworth Road SE17 1JL
606 Julian Markham House 114 Walworth Road SE17 1JL
104-124 Newington Butts London SE11 4QU
101 Winchester Close London SE17 3DH
Ground Floor Flat 177 Brook Drive SE11 4TG
6 Hampton Street London SE1 6SN
604 Julian Markham House 114 Walworth Road SE17 1JL
605 Julian Markham House 114 Walworth Road SE17 1JL
603 Julian Markham House 114 Walworth Road SE17 1JL
601 Julian Markham House 114 Walworth Road SE17 1JL
602 Julian Markham House 114 Walworth Road SE17 1JL
Managers Flat Hampton Court Palace SE1 6SN
12 Wollaston Close Hampton Street SE1 6SL
13 Wollaston Close Hampton Street SE1 6SL
11 Wollaston Close Hampton Street SE1 6SL
9 Wollaston Close Hampton Street SE1 6SL
10 Wollaston Close Hampton Street SE1 6SL
14 Wollaston Close Hampton Street SE1 6SL
18 Wollaston Close Hampton Street SE1 6SL
19 Wollaston Close Hampton Street SE1 6SL
17 Wollaston Close Hampton Street SE1 6SL

Flat 25 Limelight House 4 George Mathers Road SE11 4RU
Flat 25 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 26 Goddard House 3 George Mathers Road SE11 4BG
Flat 26 Limelight House 4 George Mathers Road SE11 4RU
Flat 26 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 27 Goddard House 3 George Mathers Road SE11 4BG
Flat 27 Limelight House 4 George Mathers Road SE11 4RU
Flat 27 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 28 Goddard House 3 George Mathers Road SE11 4BG
Flat 28 Linelight House 4 George Mathers Road SE11 4RU
Flat 28 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 29 Limelight House 4 George Mathers Road SE11 4RU
Flat 29 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 3 Bolton House 9 George Mathers Road SE11 4BS
Flat 3 Freeman House 10 George Mathers Road SE11 4BS
Flat 3 Goddard House 3 George Mathers Road SE11 4BG
Flat 3 Limelight House 4 George Mathers Road SE11 4RU
Flat 3 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 30 Limelight House 4 George Mathers Road SE11 4RU
Flat 30 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 31 Limelight House 4 George Mathers Road SE11 4RU
Flat 31 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 32 Limelight House 4 George Mathers Road SE11 4RU
Flat 32 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 33 Limelight House 4 George Mathers Road SE11 4RU
Flat 4 Bolton House 9 George Mathers Road SE11 4BS
Flat 4 Freeman House 10 George Mathers Road SE11 4BS
Flat 4 Goddard House 3 George Mathers Road SE11 4BG
Flat 4 Limelight House 4 George Mathers Road SE11 4RU
Flat 4 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 5 Bolton House 9 George Mathers Road SE11 4BS
Flat 5 Freeman House 10 George Mathers Road SE11 4BS
Flat 5 Goddard House 3 George Mathers Road SE11 4BG
Flat 5 Limelight House 4 George Mathers Road SE11 4RU
Flat 5 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 6 Bolton House 9 George Mathers Road SE11 4BS
Flat 6 Freeman House 10 George Mathers Road SE11 4BS
Flat 6 Goddard House 3 George Mathers Road SE11 4BG
Flat 6 Limelight House 4 George Mathers Road SE11 4RU
Flat 6 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 7 Bolton House 9 George Mathers Road SE11 4BS
Flat 7 Freeman House 10 George Mathers Road SE11 4BS
Flat 7 Goddard House 3 George Mathers Road SE11 4BG
Flat 7 Limelight House 4 George Mathers Road SE11 4RU
Flat 7 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 8 Bolton House 9 George Mathers Road SE11 4BS
Flat 8 Freeman House 10 George Mathers Road SE11 4BS
Flat 8 Goddard House 3 George Mathers Road SE11 4BG
Flat 8 Limelight House 4 George Mathers Road SE11 4RU
Flat 8 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 9 Freeman House 10 George Mathers Road SE11 4BS
Flat 9 Goddard House 3 George Mathers Road SE11 4BG
Flat 9 Limelight House 4 George Mathers Road SE11 4RU
Flat 9 Wilmot House 5 George Mathers Road SE11 4BQ
6 George Mathers Road London SE11 4RU
7 George Mathers Road London SE11 4RU
8 George Mathers Road London SE11 4RU
Apartment 1 3 Holyoak Road SE11 4DU
Apartment 10 3 Holyoak Road SE11 4DU
Apartment 11 3 Holyoak Road SE11 4DU
Apartment 12 3 Holyoak Road SE11 4DU
Apartment 13 3 Holyoak Road SE11 4DU
Apartment 14 3 Holyoak Road SE11 4DU
Apartment 15 3 Holyoak Road SE11 4DU
Apartment 16 3 Holyoak Road SE11 4DU
Apartment 17 3 Holyoak Road SE11 4DU
Apartment 18 3 Holyoak Road SE11 4DU
Apartment 19 3 Holyoak Road SE11 4DU
Apartment 2 3 Holyoak Road SE11 4DU
Apartment 20 3 Holyoak Road SE11 4DU
Apartment 21 3 Holyoak Road SE11 4DU
Apartment 22 3 Holyoak Road SE11 4DU
Apartment 23 3 Holyoak Road SE11 4DU
Apartment 3 3 Holyoak Road SE11 4DU

15 Wollaston Close Hampton Street SE1 6SL
 16 Wollaston Close Hampton Street SE1 6SL
 8 Wollaston Close Hampton Street SE1 6SL
 Store Wollaston Close SE1 6SL
 1 Wollaston Close Hampton Street SE1 6SL
 17-19 Elephant And Castle London SE1 6TH
 16 Elephant And Castle London SE1 6TH
 16a Newington Butts London SE1 6SF
 2 Wollaston Close Hampton Street SE1 6SL
 6 Wollaston Close Hampton Street SE1 6SL
 7 Wollaston Close Hampton Street SE1 6SL
 5 Wollaston Close Hampton Street SE1 6SL
 3 Wollaston Close Hampton Street SE1 6SL
 4 Wollaston Close Hampton Street SE1 6SL
 20 Wollaston Close Hampton Street SE1 6SL
 Flat A 12 Marlborough Close SE17 3AP
 Railway Arch 143 Eagle Yard SE1 6SW
 33 Wollaston Close Hampton Street SE1 6SL
 Flat 1 Draper House SE1 6SX
 Third Floor Flat 6 Hampton Street SE1 6SN
 32 Wollaston Close Hampton Street SE1 6SL
 24 Wollaston Close Hampton Street SE1 6SL
 25 Wollaston Close Hampton Street SE1 6SL
 23 Wollaston Close Hampton Street SE1 6SL
 21 Wollaston Close Hampton Street SE1 6SL
 22 Wollaston Close Hampton Street SE1 6SL
 26 Wollaston Close Hampton Street SE1 6SL
 30 Wollaston Close Hampton Street SE1 6SL
 31 Wollaston Close Hampton Street SE1 6SL
 29 Wollaston Close Hampton Street SE1 6SL
 27 Wollaston Close Hampton Street SE1 6SL
 28 Wollaston Close Hampton Street SE1 6SL
 Apartment 203 8 Walworth Road SE1 6EE
 Apartment 204 8 Walworth Road SE1 6EE
 Apartment 202 8 Walworth Road SE1 6EE
 Apartment 201 8 Walworth Road SE1 6EE
 Apartment 205 8 Walworth Road SE1 6EE
 Apartment 209 8 Walworth Road SE1 6EE
 Apartment 210 8 Walworth Road SE1 6EE
 Apartment 208 8 Walworth Road SE1 6EE
 Apartment 206 8 Walworth Road SE1 6EE
 Apartment 207 8 Walworth Road SE1 6EE
 Apartment 303 2 Walworth Road SE1 6EB
 Apartment 101 2 Walworth Road SE1 6EB
 Apartment 102 2 Walworth Road SE1 6EB
 Studio 16 86 Walworth Road SE1 6SW
 Newington Tenants Hall 77 Canterbury Place SE17 3AD
 Mess Hall 77 Canterbury Place SE17 3AD
 Apartment 103 2 Walworth Road SE1 6EB
 Apartment 301 2 Walworth Road SE1 6EB
 Apartment 302 2 Walworth Road SE1 6EB
 Apartment 203 2 Walworth Road SE1 6EB
 Apartment 201 2 Walworth Road SE1 6EB
 Apartment 202 2 Walworth Road SE1 6EB
 Apartment 301 8 Walworth Road SE1 6EE
 Apartment 407 8 Walworth Road SE1 6EE
 Apartment 408 8 Walworth Road SE1 6EE
 Apartment 406 8 Walworth Road SE1 6EE
 Apartment 404 8 Walworth Road SE1 6EE
 Apartment 405 8 Walworth Road SE1 6EE
 Apartment 409 8 Walworth Road SE1 6EE
 Apartment 503 8 Walworth Road SE1 6EE
 Apartment 504 8 Walworth Road SE1 6EE
 Apartment 502 8 Walworth Road SE1 6EE
 Apartment 410 8 Walworth Road SE1 6EE
 Apartment 501 8 Walworth Road SE1 6EE
 Apartment 403 8 Walworth Road SE1 6EE
 Apartment 305 8 Walworth Road SE1 6EE
 Apartment 306 8 Walworth Road SE1 6EE
 Apartment 304 8 Walworth Road SE1 6EE
 Apartment 302 8 Walworth Road SE1 6EE
 Apartment 303 8 Walworth Road SE1 6EE
 Apartment 307 8 Walworth Road SE1 6EE
 Apartment 401 8 Walworth Road SE1 6EE

Apartment 4 3 Holyoak Road SE11 4DU
 Apartment 5 3 Holyoak Road SE11 4DU
 Apartment 6 3 Holyoak Road SE11 4DU
 Apartment 7 3 Holyoak Road SE11 4DU
 Apartment 8 3 Holyoak Road SE11 4DU
 Apartment 9 3 Holyoak Road SE11 4DU
 1 Holyoak Road London SE11 4DU
 5 Holyoak Road London SE11 4DU
 7 Holyoak Road London SE11 4DU
 9 Holyoak Road London SE11 4DU
 Apartment 1 2 Kennington Lane SE11 4FA
 Apartment 10 2 Kennington Lane SE11 4FA
 Apartment 11 2 Kennington Lane SE11 4FA
 Apartment 12 2 Kennington Lane SE11 4FA
 Apartment 13 2 Kennington Lane SE11 4FA
 Apartment 14 2 Kennington Lane SE11 4FA
 Apartment 15 2 Kennington Lane SE11 4FA
 Apartment 16 2 Kennington Lane SE11 4FA
 Apartment 17 2 Kennington Lane SE11 4FA
 Apartment 18 2 Kennington Lane SE11 4FA
 Apartment 19 2 Kennington Lane SE11 4FA
 Apartment 2 2 Kennington Lane SE11 4FA
 Apartment 20 2 Kennington Lane SE11 4FA
 Apartment 21 2 Kennington Lane SE11 4FA
 Apartment 22 2 Kennington Lane SE11 4FA
 Apartment 23 2 Kennington Lane SE11 4FA
 Apartment 24 2 Kennington Lane SE11 4FA
 Apartment 25 2 Kennington Lane SE11 4FA
 Apartment 26 2 Kennington Lane SE11 4FA
 Apartment 27 2 Kennington Lane SE11 4FA
 Apartment 28 2 Kennington Lane SE11 4FA
 Apartment 29 2 Kennington Lane SE11 4FA
 Apartment 3 2 Kennington Lane SE11 4FA
 Apartment 30 2 Kennington Lane SE11 4FA
 Apartment 31 2 Kennington Lane SE11 4FA
 Apartment 32 2 Kennington Lane SE11 4FA
 Apartment 33 2 Kennington Lane SE11 4FA
 Apartment 34 2 Kennington Lane SE11 4FA
 Apartment 35 2 Kennington Lane SE11 4FA
 Apartment 36 2 Kennington Lane SE11 4FA
 Apartment 37 2 Kennington Lane SE11 4FA
 Apartment 38 2 Kennington Lane SE11 4FA
 Apartment 39 2 Kennington Lane SE11 4FA
 Apartment 4 2 Kennington Lane SE11 4FA
 Apartment 40 2 Kennington Lane SE11 4FA
 Apartment 41 2 Kennington Lane SE11 4FA
 Apartment 42 2 Kennington Lane SE11 4FA
 Apartment 43 2 Kennington Lane SE11 4FA
 Apartment 44 2 Kennington Lane SE11 4FA
 Apartment 45 2 Kennington Lane SE11 4FA
 Apartment 46 2 Kennington Lane SE11 4FA
 Apartment 5 2 Kennington Lane SE11 4FA
 Apartment 6 2 Kennington Lane SE11 4FA
 Apartment 7 2 Kennington Lane SE11 4FA
 Apartment 8 2 Kennington Lane SE11 4FA
 Apartment 9 2 Kennington Lane SE11 4FA
 6 - 12 Kennington Lane London SE11 4LT
 138 Kewington Butts London SE11 4QU
 1 Polperro Mews London SE11 4TY
 2 Polperro Mews London SE11 4TY
 3 Polperro Mews London SE11 4TY
 4 Polperro Mews London SE11 4TY
 5 Polperro Mews London SE11 4TY
 6 Polperro Mews London SE11 4TY
 1 Sullivan Road London SE11 4UH
 3 Sullivan Road London SE11 4UH
 5 Sullivan Road London SE11 4UH
 7 Sullivan Road London SE11 4UH
 Flat 19 26 Arch Street SE1 6AT
 10.02 One The Elephant London SE16FB
 Melbway House London SE1 6BF
 Email
 Email
 37d Oswin St. Kennington SE11 4TF

Apartment 402 8 Walworth Road SE1 6EE
 Apartment 310 8 Walworth Road SE1 6EE
 Apartment 308 8 Walworth Road SE1 6EE
 Apartment 309 8 Walworth Road SE1 6EE
 100 Walworth Road London SE17 1JL
 406 Julian Markham House 114 Walworth Road SE17 1JL
 407 Julian Markham House 114 Walworth Road SE17 1JL
 405 Julian Markham House 114 Walworth Road SE17 1JL
 403 Julian Markham House 114 Walworth Road SE17 1JL
 404 Julian Markham House 114 Walworth Road SE17 1JL
 101 Julian Markham House 114 Walworth Road SE17 1JL
 105 Julian Markham House 114 Walworth Road SE17 1JL
 106 Julian Markham House 114 Walworth Road SE17 1JL
 104 Julian Markham House 114 Walworth Road SE17 1JL
 102 Julian Markham House 114 Walworth Road SE17 1JL
 103 Julian Markham House 114 Walworth Road SE17 1JL
 402 Julian Markham House 114 Walworth Road SE17 1JL
 708 Julian Markham House 114 Walworth Road SE17 1JL
 205 Julian Markham House 114 Walworth Road SE17 1JL
 707 Julian Markham House 114 Walworth Road SE17 1JL
 705 Julian Markham House 114 Walworth Road SE17 1JL
 706 Julian Markham House 114 Walworth Road SE17 1JL
 501 Julian Markham House 114 Walworth Road SE17 1JL
 307 Julian Markham House 114 Walworth Road SE17 1JL
 Second Floor Flat 6 Hampton Street SE1 6SN
 Arch 1 3 Hampton Street SE17 3AL
 First Floor And Second Floor Flat 191 Brook Drive SE11 4TG
 107 Julian Markham House 114 Walworth Road SE17 1JL
 Third Floor Flat 84 Walworth Road SE1 6SW
 Ground Floor Flat 191 Brook Drive SE11 4TG
 Second Floor Flat 84 Walworth Road SE1 6SW
 First Floor Flat 84 Walworth Road SE1 6SW
 Flat 1 187 Brook Drive SE11 4TG
 First Floor Flat 177 Brook Drive SE11 4TG
 Second Floor Flat 177 Brook Drive SE11 4TG
 Flat 4 187 Brook Drive SE11 4TG
 Flat 2 187 Brook Drive SE11 4TG
 Flat 3 187 Brook Drive SE11 4TG
 306 Julian Markham House 114 Walworth Road SE17 1JL
 204 Julian Markham House 114 Walworth Road SE17 1JL
 206 Julian Markham House 114 Walworth Road SE17 1JL
 203 Julian Markham House 114 Walworth Road SE17 1JL
 201 Julian Markham House 114 Walworth Road SE17 1JL
 202 Julian Markham House 114 Walworth Road SE17 1JL
 207 Julian Markham House 114 Walworth Road SE17 1JL
 304 Julian Markham House 114 Walworth Road SE17 1JL
 305 Julian Markham House 114 Walworth Road SE17 1JL
 303 Julian Markham House 114 Walworth Road SE17 1JL
 301 Julian Markham House 114 Walworth Road SE17 1JL
 302 Julian Markham House 114 Walworth Road SE17 1JL
 Apartment 2304 8 Walworth Road SE1 6EH
 Flat 104 Highline Building SE17 3AF
 Flat 105 Highline Building SE17 3AF
 Flat 103 Highline Building SE17 3AF
 Flat 101 Highline Building SE17 3AF
 Flat 102 Highline Building SE17 3AF
 Flat 106 Highline Building SE17 3AF
 Flat 203 Highline Building SE17 3AF
 Flat 204 Highline Building SE17 3AF
 Flat 202 Highline Building SE17 3AF
 Flat 107 Highline Building SE17 3AF
 Flat 201 Highline Building SE17 3AF
 Arch 152 10 Steedman Street SE17 3AF
 Arch 149 Eagle Yard SE1 6SP
 Arch 150 Eagle Yard SE1 6SP
 Arch 148 Eagle Yard SE1 6SP
 Arch 146 Eagle Yard SE1 6SP
 Arch 147 Eagle Yard SE1 6SP
 Arch 150 10 Steedman Street SE17 3AF
 Arch 151 10 Steedman Street SE17 3AF
 Unit 1 Arch 146 Eagle Yard SE1 6SP
 16a Elephant And Castle London SE1 6TH
 Flat 301 Highline Building SE17 3AF
 Flat 702 Highline Building SE17 3AF
 1c Austral Street London SE114SJ
 25 Crystal Court London SE19 1UZ
 91b Penton Place London SE17 3JR
 3 Hayles Street London SE11 4SU
 Apartment 505 1 St Gabriel'S Walk SE1 6FA
 Apartment 3104 1 St Gabriel Walk SE1 6FF
 3 Austral Street London SE11 4SJ
 Apartment 2702 1 St Gabriel Walk SE1 6FB
 Apartment 2703 1 St Gabriel Walk SE1 6FB
 Apartment 2704 1 St Gabriel Walk SE1 6FB
 Apartment 2705 1 St Gabriel Walk SE1 6FB
 Apartment 2706 1 St Gabriel Walk SE1 6FB
 Apartment 2707 1 St Gabriel Walk SE1 6FB
 Apartment 2708 1 St Gabriel Walk SE1 6FB
 Apartment 2801 1 St Gabriel Walk SE1 6FB
 Apartment 2802 1 St Gabriel Walk SE1 6FB
 Apartment 2803 1 St Gabriel Walk SE1 6FB
 Apartment 2804 1 St Gabriel Walk SE1 6FB
 Apartment 2805 1 St Gabriel Walk SE1 6FB
 Apartment 2806 1 St Gabriel Walk SE1 6FB
 Apartment 2807 1 St Gabriel Walk SE1 6FB
 Apartment 2808 1 St Gabriel Walk SE1 6FB
 Apartment 2901 1 St Gabriel Walk SE1 6FB
 Apartment 2902 1 St Gabriel Walk SE1 6FB
 Apartment 2903 1 St Gabriel Walk SE1 6FB
 Apartment 2904 1 St Gabriel Walk SE1 6FB
 Apartment 2905 1 St Gabriel Walk SE1 6FB
 Apartment 3001 1 St Gabriel Walk SE1 6FB
 Apartment 3002 1 St Gabriel Walk SE1 6FB
 Apartment 3003 1 St Gabriel Walk SE1 6FB
 Apartment 3004 1 St Gabriel Walk SE1 6FB
 Apartment 3005 1 St Gabriel Walk SE1 6FB
 Apartment 3101 1 St Gabriel Walk SE1 6FB
 Apartment 3102 1 St Gabriel Walk SE1 6FB
 Apartment 3103 1 St Gabriel Walk SE1 6FB
 Apartment 3104 1 St Gabriel Walk SE1 6FB
 Apartment 3105 1 St Gabriel Walk SE1 6FB
 Apartment 3201 1 St Gabriel Walk SE1 6FB
 Apartment 3202 1 St Gabriel Walk SE1 6FB
 Apartment 3203 1 St Gabriel Walk SE1 6FB
 Apartment 3204 1 St Gabriel Walk SE1 6FB
 Apartment 3205 1 St Gabriel Walk SE1 6FB
 Apartment 3301 1 St Gabriel Walk SE1 6FB
 Apartment 3302 1 St Gabriel Walk SE1 6FB
 Apartment 3303 1 St Gabriel Walk SE1 6FB
 Apartment 3304 1 St Gabriel Walk SE1 6FB
 Apartment 3305 1 St Gabriel Walk SE1 6FB
 Apartment 3401 1 St Gabriel Walk SE1 6FB
 Apartment 3402 1 St Gabriel Walk SE1 6FB
 Apartment 3403 1 St Gabriel Walk SE1 6FB
 Apartment 3404 1 St Gabriel Walk SE1 6FB
 Apartment 3405 1 St Gabriel Walk SE1 6FB
 Apartment 3501 1 St Gabriel Walk SE1 6FB
 Apartment 3502 1 St Gabriel Walk SE1 6FB
 Apartment 3601 1 St Gabriel Walk SE1 6FB
 Unit 1 22 Elephant And Castle SE1 6BH
 Unit 2 22 Elephant And Castle SE1 6BH
 Unit 3 22 Elephant And Castle SE1 6BH
 Unit 4 22 Elephant And Castle SE1 6BH
 86 Scylla Road SE15 3PB
 C/O E-Mail
 By E-Mail
 28 Sutherland Square London
 Via Email x
 6 Cartwright House County Street SE1 6AN
 By E-Mail
 By E-Mail
 By E-Mail
 7 Orient Street London SE11 4SR
 158 Rowan Road Streatham SW16 5JQ
 15 Oswin Street London SE11 4TF
 158 Rowan Road London SW16 5JQ
 2 Wolsey Road Islington N1 4QH

Flat 703 Highline Building SE17 3AF
Flat 701 Highline Building SE17 3AF
Flat 501 Highline Building SE17 3AF
Flat 504 Highline Building SE17 3AF
Flat 704 Highline Building SE17 3AF
Studio 2 Highline Building SE17 3AF
Studio 3 Highline Building SE17 3AF
Studio 1 Highline Building SE17 3AF
Flat 801 Highline Building SE17 3AF
Flat 802 Highline Building SE17 3AF
Flat 604 Highline Building SE17 3AF
Flat 402 Highline Building SE17 3AF

50 Cooper Close London SE1 7QU
32 Benbow House 24 New Globe Walk SE1 9DS
1 St Gabriel Walk, Apartment 2105 One The Elephant SE1 6FD
Flat 2 3 - 5 Oswin Street SE11 4TF
10 Gaywood Street London SE1 6HG
171 Brook Drive London SE11 4TG
By Email
B One The Elephant Se16fd
Unit 203 By Email
12b Gaywood Street London SE1 6hg
59 Stephenson House Bath Terrace Se1 6PR
15 Rankine House Bath Terrace SE1 6PL
Elephant & Castle Traders Association

APPENDIX 2

Consultation responses received

Internal services

Refer to summary of consultation responses.

Statutory and non-statutory organisations

City Of London
Environment Agency
Health & Safety Executive
Historic England
London Borough of Islington
London Underground Limited
Natural England - London Region & South East Region
Network Rail (Planning)
Thames Water - Development Planning
The Theatres Trust
Transport for London (referable & non-referable app notifications and pre-apps)
Twentieth Century Society
Westminster City Council

Neighbours and local groups

EMAIL

Apartment 1001 8 Walworth Road SE1 6EE
Apartment 10.04 1 St Gabriel Walk SE16FB
Apartment 1407 1 St Gabriel Walk SE1 6FB
Apartment 16.06 1 St Gabriel Walk SE1 6FB
Apartment 1806 1 St Gabriel Walk SE1 6FB
Apartment 1911 8 Walworth Road SE1 6EG
Apartment 2405 1 St Gabriel Walk SE1 6FD
Apartment 2506 1 St Gabriel Walk SE1 6FD
Apartment 29.05 1 St Gabriel Walk SE1 6FD
Apartment 301 8 Walworth Road SE1 6EE
Apartment 3104 1 St Gabriel Walk SE1 6FF
Apartment 3201 8 Walworth Road SE1 6EJ
Apartment 3201 8 Walworth Road SE1 6EJ
Apartment 3201 8 Walworth Road SE1 6EJ
Apartment 3203 8 Walworth Road SE1 6EJ
Apartment 3305 1 St Gabriel Walk SE1 6FF
Apartment 3501 1 St Gabriel Walk SE1 6FB
Apartment 3501 1 St Gabriel Walk SE1 6FB
Apartment 3502 1 St Gabriel Walk SE1 6FB
Apartment 505 1 St Gabriel Walk SE1 6FA
Apartment 505 1 St Gabriel'S Walk SE1 6FA
Apartment 601 8 Walworth Road SE1 6EE
Apartment 607 1 St Gabriel Walk SE1 6FA
Apartment 607 1 St Gabriel Walk SE1 6FA

Apartment 808 1 St Gabriel Walk SE1 6FA
Apt 1405 1 St Gabriel Walk SE1 6FB
Apt 28.07 1 St Gabriel Walk SE1 6FD
B One The Elephant Se16fd
Barset Road London SE15 3HE
Basement Flat 25 West Square SE11 4SP
By E-Mail
By Email
By Email
By Email
By Email
By Email
By Email
By Email
Christmas Cottage Southstoke BA2 7DL
Cinema Theatre Association X
C/O E-Mail
C/O E-Mail
C/O Shopping Centre Elephant And Castle SE1
Elephant & Castle Traders Association
Email representation
Email representation
Email representation
Email representation
Email representation
Email representation
Email representation
Email representation
Email representation
Email representation
Email representation
Email representation
Email representation
Equinox Southampton Way London SE5 7HQ
Flat 1 Restormel House Kennington SE11 4UU
Flat 1, 2 Jowett Street London SE15 6JN
Flat 1 295 Camberwell New Road SE5 0TN
Flat 10 Cameron House London SE5 0UJ
Flat 14 1 Oswin Street SE11 4TF
Flat 17, Horton House Richborne Terrace SW8 1PT
Flat 19 26 Arch Street SE1 6AT
Flat 2 Bushey Hall, Bushey Hill Road London SE5 8QG
Flat 2 3 - 5 Oswin Street SE11 4TF
Flat 2 97 Warour Street W1F 0UF
Flat 23 Wilmot House 5 George Mathers Road SE11 4BQ
Flat 3 Culand House Congreve Street se17 1st
Flat 3 1 Arborfield Close SW2 3NX
Flat 3, 369 Clapham Road London SW9 9BT
Flat 304 London SE17 3BA
Flat 35, Ashton House, 53 Cottington Street, Flat 35 London SE11 4BN
Flat 4 5 Oswin Street SE11 4TF

Flat 4, 7 John Maurice Close London SE17 1PY
Flat 40 Douglas Buildings London se1 1ej
Flat 48 130 Webber Street SE1 0JN
Flat 50 Mistral SE5 7DS
Flat 50 Mistral SE5 7DS
Flat 52 London E2 6PG
Flat 60 Dawes House, Orb Street London SE17 1RD
Flat 7, Block J, Peabody Estate, Camberwell Green London SE5 7BW
Flat 81, Dorchester Court London SE24 9QY
Great Dover Street London SE1 4LB
Hanover Park House 14-16 Hanover Park SE15 5HG
Harfield Gardens London SE5 8DB
Melbway House London SE1 6BF
Metropolitan Tabernacle Church Elephant And Castle SE1 6SD
No Address
No Address
No Address N4 1LZ
One The Elephant 1 St Gabriel Walk SE1 6FD
One The Elephant 1 St Gabriel Walk SE1 6FD
St Philip'S Vicarage, Avondale Square London SE1 5PD
The Cutting Room Unit 5 N4 1DN
The Theatres Trust 22 Charing Cross Road WC2H 0QL
The Water Tower London SE14RU
Tytherly, Perrymead Bath BA25AX
T3601 1 St Gabriel Walk SE1 6FF
Unit 203 By Email
Unit 217 Shopping Centre SE1 6TE
1 Oswin Street London SE11 4TF
1 St Gabriel Walk, Apartment 2105 One The Elephant SE1 6FD
1 St Gabriel Walk, Apartment 2105 One The Elephant SE1 6FD
1 St Gabriel Walk London SE1 6FB
1 St Gabriel Walk London SE1 6FD
1b St Faiths Road Flat 2 se21 8jd
1c Austral Street London SE114SJ
10 Gaywood Street London SE1 6HG
10 Perronet House, Princess Street London SE1 6JR
10b Turquand Street SE17 1LT
10b Turquand Street London SE17 1LT
10.02 One The Elephant London SE16FB
102 Lymington Avenue London N22 6JG
103 Draper House 20 Elephant & Castle SE1 6SY
103 Draper House 20 Elephant & Castle SE1 6SY
106c Camberwell Grove London SE5 8JH
11 Delawyk Crescent London SE24 9JB
116 Camberwell New Road London SE5 0RS
116 Glanville Road London SW2 5DF
116 Walworth Road London SE1 5SW
118 Buchan Road London SE15 3HG
12 Hayles Street London SE11 4SS
12 Hayles Street London SE11 4SS
12 Upland Road London SE22 0DL
12b Gaywood Street London SE1 6hg
12b Gaywood Street London SE1 6hg
125b Brook Drive London SE11 4TQ

126a Barry Road London SE22 0HP
126a Barry Road London SE220HP
13 Freemantle Street London SE17 2JP
13 Hayles Street Kennington SE11 4SU
13 St Georges Buildings St Georges Road SE1 6EP
131a Peckham Rye London SE15 3UL
137b Coldharbour Lane London SE5 9NU
138 Lancaster Road, First Floor Flat London W11 1QU
138 The Circle Queen Elizabeth Street SE1 2JJ
138b Roding Road London E5 0DS
14 Marney Road London SW115EP
145 Kennington Park Road London SE11 4JJ
145 Kennington Park Road London Se11 4jj
15 K Southwark Street London Se1 0tn
15 Oswin Street London SE11 4TF
15 Oswin Street London SE11 4TF
15 Oswin Street London SE11 4TF
15 Rankine House Bath Terrace SE1 6PL
15 West Square London SE11 4SN
152 Pomeroy Street London SE14 5BT
158 Rowan Road London SW16 5JQ
158 Rowan Road Streathamn sw16 5jq
16 Addington Sq London SE5 7JZ
16 Brunlees House London SE1 6QF
16 Metro Central Heights 119 Newington Causeway SE1 6BA
16a Charleston Street London SE17 1NF
160 Crampton St London SE17 3AE
162 Brixton Road London SW90 6AU
162 Caroline Gardens Asylum Road SE15 2SG
165 John Ruskin Street London SE5 0PQ
165 John Ruskin Street London SE5 0PQ
168 Walworth Road London SE17 3PS
17 Brunlees House London SE1 6QF
17 Melbway House. 18 Meadow Row London SE1 6BF
17 West Square London SE11 4SN
17a Charleston Street London SE17 1NG
17a Charleston Street London SE17 1NG
171 Brook Drive London SE11 4TG
171 Brook Drive London SE11 4TG
18 Azalea House New Cross SE14 6BA
18 Casino Avenue London SE249PH
18 Market Place, Blue Anchor Lane London SE16 3UQ
18 Market Place, Blue Anchor Lane London SE16 3UQ
18 Market Place, Blue Anchor Lane London SE16 3UQ
19 Buller Close London SE15 6UJ
19b Charleston Street London SE17 1NG
19b Oswin Street London SE11 4TF
199 Eade Road London N4 1DN
2 Emperor Court London CT1 2HZ
2 Falcon Point, Hopton Street London SE1 9JW
2 Lady Florence Courtyard Reginald Square SE8 4RU
2 Lily Mews London SE11 4FN
2 Wolsey Road Islington N1 4QH
2 Wolsey Road Islington N1 4QH

209 Shopping Centre Elephant And Castle SE1 6TE
21 Overbury Road London N15 6RH
219 Elephant And Castle Shopping Centre London SE1 6TE
219 Shopping Centre Elephant And Castle SE1 6TE
219 Shopping Centre Elephant And Castle SE1 6TE
219 Shopping Centre Elephant And Castle SE1 6TE
22-27 The Oval London e2 9dt
23 Fielding Street London SE17 3HE
23 Rankine House Bath Terrace SE1 6PL
23 Rankine House Bath Terrace SE1 6PL
24 Brantwood House, Wyndham Estate London SE50XP
24 Hayles Street London SE11 4SS
24 West Square London SE11 4SN
241 Camberwell New Rd, Top Flat London SE5 0TH
247a Walworth Road London SE17 1RL
25 Cobourg Rd London SE5 0HT
25 Crystal Court London SE19 1UZ
25 Crystal Court London SE19 1UZ
25 Fielding Street London SE17 3HE
26 West Square London SE11 4SP
26 West Square London SE11 4SP
27 Henshaw Street London SE17 1PE
27 Henshaw Street London SE17 1PE
27 Oswin Street London SE11 4TF
27 Oswin Street London SE11 4TF
27 Oswin Street London SE11 4TF
27 Oswin Street London SE11 4TF
28 Dover Flats London SE1 5NJ
28 Martin House Falmouth Road SE1 6QP
28 Sutherland Square SE17 3EQ
28 Sutherland Square SE17 3EQ
28 Wollaston Close Hampton Street SE1 6SL
29 Innis House East Street SE17 2JN
29 Ravensdon St London SE11 4AQ
29b Palamos Road London E10 7JF
3 Austral Street London SE11 4SJ
3 Austral Street London SE11 4SJ
3 Hathorne Close London SE15 2BY
3 Hayles Street London SE11 4SU
3 Hayles Street London SE11 4SU
3 Portland Street London SE17 2PF
3 The Grange Surrey Kt3 6ny
3 Waterhouse Square 138 Holborn EC1N 2SW
30 Berryfield Rd London se17 3qe
30 Cork Tree House London SE27 0QE
30 West Square London SE11 4SP
30 West Square London SE11 4SP
306 Omega Works London E3 2GZ
31 Angelina House, Goldsmith Road Peckham SE15 5UB
31 Oswin Street London SE11 4TF
32 Benbow House 24 New Globe Walk SE1 9DS
32 Marshall House Mintern Street N1 6TX
32b Larcom Street London SE17 1NQ
34 Huberd House Manciple Street London SE1 4DN

3401 Styrata London SE1 6EJ
35 Arrol House, Rockingham Street, London SE1 6QJ
359 Wendover Thurlow Street SE17 2UR
36 Columbia Point London SE16 7BE
36 Mundania Road London SE22 0DZ
37 Chatsworth Estate Elderfield Road E5 0BA
37 St Georges Avenue London n7 0hb
37a Charleston Street London SE17 1NG
37d Oswin St. Kennington SE11 4TF
38, Perronet House Princess Street London SE1 6JR
39 Hawstead Road London SE6 4JL
39 West Square London SE11 4SP
39, West Square London SE114S)
39, West Square London SE114S)
4 Hayles Street London SE11 4SS
4 Hayles Street London SE11 4SS
4 Hayles Street London SE11 4SS
4 Hayles Street London SE11 4SS
4 Hayles Street London SE11 4SS
4 St John'S Court Devizes SN10 1BU
40 Grosvenor Terrace London SE50NP
40 West Square London SE11 4SP
401 Tyler Court London SE17 1AX
41 West Square London SE11 4SP
41 West Square London SE11 4SP
41 West Square London SE11 4SP
42 Camberwell Grove London SE5 8RE
42 West Square London SE11 4SP
42 West Square London SE11 4SP
42 West Square London SE11 4SP
42 West Square London SE11 4SP
42 West Square London SE11 4SP
43 Larrence Avenue London NW7 4NL
433 Mile Oak Road Bn41 2rd Bn412rd
44 Cleveland Street London W1T 4JT
45 Arrol House Rockingham Street SE1 6QL
46a Riversdale Road London N5 2JT
462 Metro Central Heights 119 Newington Causeway SE1 6DT
47 Aylesbury Road London SE17 2EQ
47a East Street London SE17 9VE
5 Colnbrook Street London SE1 6EZ
5 Melford Court London SE1 3DX
5 St Gabriel Walk London SE16FS
5 Temple West Mews West Square SE11 4TJ
50 Cooper Close London SE1 7QU
50 Sutherland Square London sE17 3EE
51 Great Marlborough Street London W1F 7JT
51 Great Marlborough Street London W1F 7JT
51 Great Marlborough Street London W1F 7JT
51 Hatcham Park Road New Cross Gate SE14 5QE
51 Hatcham Park Road New Cross Gate SE14 5QE
52 Arrol House Rockingham Street London SE1 6QL
52 Dunsmure Road London N16 5PP
52 Graham Road London E7 1PB

52 Hayles Buildings Elliotts Row SE11 4TD
52 Surrey Square London Se172jx
57 Mistral Sceaux Gardens Estate SE5 7DS
58 Harpenden Road SE27 0AF
58 Harpenden Road SE27 0AF
59 Stephenson House Bath Terrace Se1 6PR
59 Stephenson House Bath Terrace Se1 6PR
6 George Mathers Road London SE11 4RU
6 Sister Mabel'S Way London SE15 6UL
6 St Peter'S House Queens Row SE17 2PT
60 Carlton Mansions Holmleigh Road N16 5PX
603 Blackwood Apartments London Se171aq
62 Centrepont London SE1 5NX
63 East Dulwich Grove East Dulwich SE22 8PR
63a Grosvenor Park London SE50NJ
64 Sandhurst Drive IG3 9DE
64 Sandhurst Drive IG3 9DE
65 Corrance Road London SW2 5RD
68 Swan Mead London se1 4sx
7 Alder Close Egham TW20 0LU
7 Dauncey House Webber Row SE1 8QS
7 Fresco House London SE5 7FR
7 Grafton Mews London W1T 5HY
7 Oswin Street London SE11 4TF
7 Oswin Street London SE11 4TF
7 Oswin Street London SE11 4TF
7 Oswin Street London SE11 4TF
7 Oswin Street London SE11 4TF
7 Woden Avenue CO3 0QY
70 Aylesbury Road London SE17 2EH
70 Aylesbury Road London SE17 2EH
73a Church Street London N16 0AY
76 Shenley Road, Camberwell Green London SE5 8NQ
77-85 Newington Causeway London SE1 6BD
77-85 Newington Causeway London SE1 6BD
78-82 Nightingale Grove London Se13 6dz
8 Blue Lion Place London SE1 4PU
8 West Square London SE11 4SN
80 Arodene Road SW2 2BH
81 Arnold Estate London Se1 2dx
81 Knoll Crescent HA6 1HH
81a Balfour Street London SE17 1PL
81a Balfour Street London SE17 1PL
81a Balfour Street London SE17 1PL
82b Peckham Hill Street, Peckham London SE15 5JT
83 Aveling Park Road Walthamstow E17 4NS
84 Kitley Gardens London SE19 2RY
86 Scylla Road London SE15 3PB
86 Scylla Road SE15 3PB
87 Balfour Street London SE17 1PB
9 Blannedowne Denmark Hill SE5 8HT
9 Ingran Street Huntingdon PE29 3QG
9 St Georges Buildings St Georges Road SE1 6EP
90 Crofton Road London SE5 8NA

90 London Road Southbank Technopark SE1 6LN
91b Penton Place London SE17 3JR
92a Walworth Road London SE1 6SW
99b Forest Road London E8 3BH