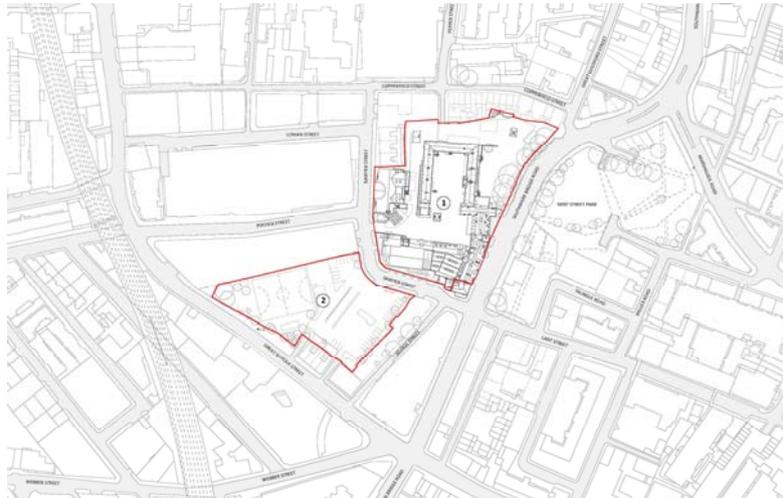


Item No. 7.3	Classification: Open	Date: 30 January 2018	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 17/AP/0367 for: Full Planning Application and Listed building application 17/AP/0368</p> <p>Address: SOUTHWARK FIRE STATION, 94 SOUTHWARK BRIDGE ROAD, LONDON SE1 0EG; GROTTO PLACE AND GROTTO PODIUMS (full planning application)</p> <p>SOUTHWARK FIRE STATION, 94 SOUTHWARK BRIDGE ROAD, LONDON SE1 0EG (listed building consent)</p> <p>Proposal: Redevelopment of the site including alterations and extensions to listed buildings for a mixed use scheme to provide a new secondary school with sixth form (up to 1150 pupils), 199 residential units, 234 sqm of flexible commercial or community use (Class A1, A3, B1, D1, D2), a 139 sqm Gym (D2) associated landscape and public realm works, cycle parking, disabled parking and servicing access; and the redevelopment of land at Grotto Place for the provision of a new sports hall (1,452sqm) and external multi use games facility and landscaping.</p>		
Ward(s) or groups affected:	Cathedrals		
From:	Director Of Planning		
Application Start Date 16/03/2017		Application Expiry Date 15/06/2017	
Earliest Decision Date 06/05/2017			

RECOMMENDATION

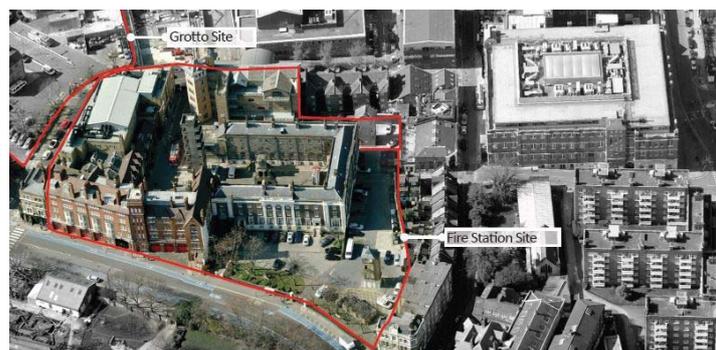
1.
 - a) That planning permission be granted for application 17AP0367, subject to conditions and referral to the Mayor for London, and the applicant entering into an appropriate legal agreement by no later than 27 April 2018.
 - b) That in the event that the requirements of (a) are not met by 27 April 2018, that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 153 of the report;
 - c) That listed building consent be granted for 17AP0368, subject to the decision on the related planning application having been issued.

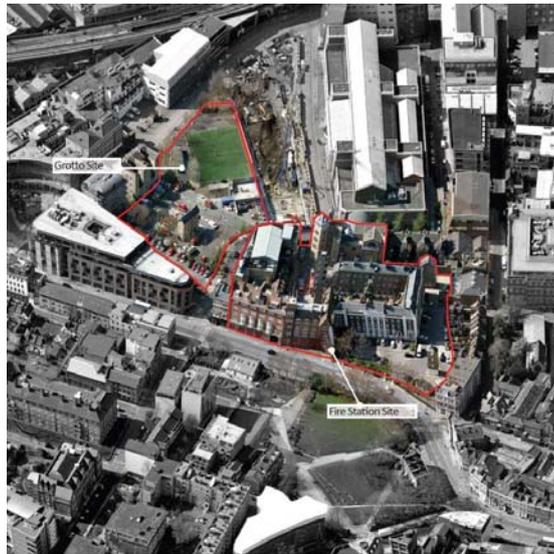
BACKGROUND INFORMATION



Site location and description

2. The application covers two sites. The main site is the Former Southwark Fire Station which is an irregular shaped plot measuring 0.88 hectares bounded by Copperfield Street to the north, Southwark Bridge Road to the east, and Sawyer Street to the south and west. The site contains two Grade II listed buildings: The former Southwark Fire Station comprising the Engine House, Main and South Blocks and Cottage Blocks, and Winchester House which is arranged in a quadrangle around an internal courtyard. This building is fronted by a large forecourt facing Southwark Bridge Road where there are series of large mature trees and a fire tower. Facing Sawyer Street is a modern three storey building (the Fire House) which is used for fire training.





3. The buildings on site are typically three to four storeys, rising to six storeys facing Southwark Bridge Road. Until early 2014, the site was occupied by the London Fire Brigade, and included the London Fire Brigade Museum. Adjoining the site to the north are two and three storey residential dwellings on Copperfield Street and Sawyer Street. Adjoining the site to the south, on the corner of Southwark Bridge Road and Sawyer Street is the four storey Goldsmith Public House. Mint Street Park is opposite the site to the east.
4. The Grotto Place site, measuring 0.6 hectares, lies to the south west of the Fire station on the opposite side of Sawyer Street. The site is owned by the Council and held on a long lease by the London Fire Brigade who until recently used the land for drills and training. The site includes a multi-use games court, and a number of small buildings used for training and storage. The site is also used informally for parking cars associated with the Fire Brigade – a separate area of more formalised car parking fronting the Sturge Street boundary does not form part of the application site. Largely open in character, the site is designated partly as Borough Open Land and partly as Other Open Space in the development plan, and also includes a number of trees which are subject to Tree Preservation Orders. Under current arrangements the site is not accessible to the general public.
5. The application site (comprising the Former Fire Station and Grotto Place) does not fall within a conservation area but does lie adjacent to the Union Street Conservation Area (to the north) and the Liberty of the Mint Conservation Area to the east.
6. The site falls within the Central Activities Zone (CAZ), the London Bridge, Borough and Bankside Opportunity Area, and a town centre. It benefits from a high public transport accessibility level (PTAL) of 6a (excellent) with Borough and Southwark Underground stations within a 400 metre walk and is also on the bus route 344. Southwark Bridge Road forms part of the route of Cycle Superhighway 7.

Details of proposal

7. The proposal seeks to redevelop the site to deliver:
 - a new secondary school and sixth form college accommodating up to 1,150 pupils;
 - 199 new dwellings;
 - flexible commercial space (Class A1, A3, B1, D1) (234 sqm (GEA));

- a sports hall, Multi Use Games Area (MUGA), open space and cycle storage on the Grotto Place site.
8. The proposal will involve alterations to listed buildings, for which listed building consent is sought under application reference 16AP0368.



School

9. The proposed secondary school and sixth form will be operated by Haberdashers' Aske Federation who currently manage three state-maintained schools that educate children from aged 3-18. Once opened the new secondary school will admit 180 children a year, growing year on year and ultimately opening a sixth form. The new secondary school will be supported by the Federation's other schools but principally Haberdasher's Aske's Hatcham College in New Cross. Once fully occupied the school will accommodate 900 pupils (with 6 forms in each year) and a sixth form college catering for up to 250 pupils.
10. The school sits on the northern part of the Main site utilising the converted and extended Fire Station buildings, including Winchester House. There would be two areas of outdoor amenity space within the school, one within the Winchester House courtyard and the other, which includes the main arrival space, fronting Southwark Bridge Road. The school would have secondary, managed, entrances from Sawyer Street and Copperfield Street/Pepper Street.
11. The Sports Hall and recreation facilities provided on the Grotto site will be used by the school during school hours, and at other times, including weekends and school holidays, will be available for public use.



Commercial Use

12. The ground floor of the South Block would be converted to provide a commercial unit, which the applicant has requested be designated flexibly to allow use as a shop, café, office or a leisure/community space.

Residential

13. 199 residential units are proposed, most of which would be accommodated within a new perimeter block that would front on to Sawyer Street. The footprint of the residential building is similar to the 20th century buildings that it will replace, but will rise to a maximum of 10 storeys. In addition, a number of dwellings would sit within retained parts of the Fire Station, namely the Engine House, Cottage Block and South Block. Issues relating to affordable housing and the quality of the accommodation are set out in paragraphs 91 to 100 of the report.



14. A courtyard providing amenity space, servicing and disabled parking is proposed at the centre of the residential block. Pedestrians and cyclists can enter this courtyard either via a retained archway from Southwark Bridge Road, or through a new arch route from Sawyer Street, and access to most of the flats is from this courtyard. Vehicle access, for service vehicles or disabled users, is only available from Sawyer Street.
15. A gym is proposed at first floor level that will be accessible to residents and the wider public.

Revisions to the application

16. During the course of the application, a series of changes were made to the scheme in response to comments by officers and members of the public.
 - Revisions to the design of the Grotto Open Space to redistribute cycle storage for the school, improve open space and to make alterations to the design of the Sports Hall;
 - Inclusion of a draft landscape design;
 - Re-planning of internal layout reducing the number of residential units from 205 to 199;
 - Alterations to servicing and waste collection strategy.
17. Re-consultation was carried out in July 2017.

Relevant Planning history

18.

<p>15/AP/4650 Application type: Screening Opinion (EIA) (SCR) Screening Opinion for the redevelopment of the site including alterations and extensions to listed buildings for a mixed use scheme up to 15 storeys in height with basement works, a new 6 form entry secondary school with sixth form of up to 10,500 sqm, up to 185 residential units (11,500sqm), associated landscape and public realm works, cycle parking, disabled parking and access works. Decision date 15/12/2015 Decision: Screening Opinion - EIA not required (SCR)</p>
<p>16/AP/0931 Application type: Screening Opinion (EIA) (SCR) Screening Opinion for the redevelopment of the following two sites:</p> <p>Site 1: Land bounded by Southwark Bridge Road, Sawyer Street and Pepper Street (the fire station site) Redevelopment, part demolition and conversion of the buildings including listed buildings for a mixed use scheme up to 10 storeys in height and basement works for provision of a new secondary school and sixth form (Class D1) of up to 10,500sqm (GEA), the provision of up to 175 residential units (Class C3) (11,000sqm GEA), associated landscaping and public realm works, cycle parking and disabled parking and new pedestrian access.</p> <p>Site 2: Land bounded by Sawyer Street, Sturge Street and Great Suffolk Street (the Grotto site) Redevelopment to provide a new sports hall and ancillary facilities including new changing facility, new multi-use games area, and additional landscaped car parking. Decision date 30/03/2016 Decision: Screening Opinion - EIA Not required</p>
<p>15/EQ/0255 Application type: Pre-Application Enquiry (ENQ) Redevelopment of the existing site to create a mixed use development incorporating the existing listed buildings to create a 6 Form Entry Secondary School and sixth form (total 1150 pupils), associated sports hall and muga, enabling residential development (167 flats), in a development of no more than 9 storeys, and associated ancillary facilities. Decision date 30/06/2016 Decision: Pre-application enquiry closed (EQC)</p>
<p>17/AP/0078 Application type: Tree Preservation Order - works related (TPO) T1 - T3: Tree of Heaven - Crown clean T4 - T11: London Plane - Crown clean T12 - T15: Cherry - Crown clean Decision date 27/01/2017 Decision: TPO consent granted (TPOG)</p>

Planning history of adjoining sites

19. None of relevance.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

20. The main issues to be considered in respect of application 17AP0367 (for planning permission) are:

a) Principle of redevelopment in terms of land use and conformity with the

- development plan including impact on designated open space
 - b) Design
 - c) Provision of new education facilities
 - d) Provision of housing, including affordable housing and housing mix
 - e) Density
 - f) Quality of accommodation
 - g) Impact of the amenities of occupiers of adjoining properties
 - h) Traffic and servicing
 - i) Archaeology
 - j) Planning obligations
 - k) Sustainable development implications
21. In relation to application 17AP0368 (for listed building consent):
- a) Impact of the works, including demolition, on the heritage value and significance of the Listed Buildings

Planning policy

National Planning Policy Framework (the Framework)

- 22.
- Section 2: Ensuring the vitality of town centres
 - Section 4: Promoting sustainable development
 - Section 6: Delivering a wide choice of good 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 the natural environment
 - Section 12: Conserving and enhancing the historic environment

The London Plan 2016

- 23.
- Policy 2.11 Central Activities Zone – Strategic functions
 - Policy 2.13 Opportunity Areas and intensification areas
 - Policy 2.15 Town Centres
 - Policy 3.1 Ensuring equal life chances for all
 - Policy 3.2 Health and addressing health inequalities
 - Policy 3.3 Increasing housing supply
 - Policy 3.4 Optimising housing potential
 - Policy 3.5 Quality and design of housing developments
 - Policy 3.6 Children and young people's play and informal recreation facilities
 - Policy 3.7 Large residential developments
 - Policy 3.8 Housing choice
 - Policy 3.9 Mixed and balanced communities
 - Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
 - Policy 3.16 Protection and enhancement of social infrastructure
 - Policy 3.18 Education facilities
 - Policy 4.6 Support for enhancement of arts, culture, sport and entertainment provision
 - Policy 4.12 Improving opportunities for all
 - Policy 5.1 Climate change mitigation
 - Policy 5.2 Minimising carbon dioxide emissions
 - Policy 5.3 Sustainable design and construction
 - Policy 5.5 Decentralised energy networks?
 - Policy 5.6 Decentralised energy in development proposals
 - Policy 5.7 Renewable energy
 - Policy 5.9 Overheating and cooling

Policy 5.10 Urban greening
 Policy 5.11 Green roofs and development site environs
 Policy 5.12 Flood risk management
 Policy 5.13 Sustainable drainage
 Policy 5.14 Water quality and waste water infrastructure
 Policy 5.15 Water use and supplies
 Policy 6.3 Assessing effects of development on transport capacity infrastructure
 Policy 6.9 Cycling
 Policy 6.10 Walking
 Policy 6.11 Smoothing traffic flow and tackling congestion
 Policy 6.12 Road network capacity
 Policy 6.13 Parking
 Policy 7.1 Building London's neighbourhoods and communities
 Policy 7.2 An inclusive environment
 Policy 7.4 Local character
 Policy 7.5 Public realm
 Policy 7.6 Architecture
 Policy 7.8 Heritage assets and archaeology
 Policy 7.9 Heritage-led regeneration
 Policy 7.14 Improving air quality
 Policy 7.15 Reducing noise and enhancing soundscapes
 Policy 7.18 Protecting local open space and addressing local deficiency
 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

Regional Supplementary Planning Documents (SPDs) and guidance

24. Central Activities Zone SPG (2016)
 Providing for Children and Young People's Play and Informal Recreation (2012)
 Sustainable Design and Construction (2006)
 Housing SPG (2016) Social Infrastructure SPG (2015)

Core Strategy 2011

25. Strategic Policy 1 – Sustainable development
 Strategic Policy 2 – Sustainable transport
 Strategic Policy 3 - Shopping, leisure and entertainment
 Strategic Policy 4 – Places to learn and enjoy
 Strategic Policy 5 – Providing new homes
 Strategic Policy 6 – Homes for people on different incomes
 Strategic Policy 7 – Family homes
 Strategic Policy 11 – Open spaces and wildlife
 Strategic Policy 12 – Design and conservation
 Strategic Policy 13 – High environmental standards

Southwark Plan 2007 (July) - saved policies

26. Policy 2.4 Educational Deficiency – Provision of New Educational Establishments
 Policy 2.5 Planning obligations
 Policy 3.1 Environmental effects
 Policy 3.2 Protection of amenity
 Policy 3.3 Sustainability assessment
 Policy 3.4 Energy efficiency
 Policy 3.6 Air quality

Policy 3.7 Waste reduction
 Policy 3.9 Water
 Policy 3.11 Efficient use of land
 Policy 3.12 Quality in design
 Policy 3.13 Urban design
 Policy 3.14 Designing out crime
 Policy 3.17 Listed Buildings
 Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites
 Policy 3.19 Archaeology
 Policy 3.26 Borough Open Land (BOL) - OS12 Grotto Open Space
 Policy 3.27 Other Open Space (OSS) - OS11 Grotto Podiums
 Policy 3.28 Biodiversity
 Policy 4.1 Density of residential development
 Policy 4.2 Quality of residential accommodation
 Policy 4.3 Mix of dwellings
 Policy 4.5 Wheelchair affordable housing
 Policy 5.1 Locating Developments
 Policy 5.2 Transport impacts
 Policy 5.3 Walking and cycling
 Policy 5.6 Car parking
 Policy 5.7 Parking standards for disabled and the mobility impaired
 Policy 5.8 Other parking

New Southwark Plan Submission Version – Area Visions and Site Allocations

27. NSP4: London Fire and Emergency Planning Authority;
28. The site is designated NSP4 within the submission version of the New Southwark Plan, which is currently out for public consultation. The designation states that the site must provide a new secondary school and sixth form, and new homes. It may also provide new community space (Class D1 or D2). The notes go on to say that the development must retain mature boundary trees. It is noted that the designation does not cover the Grotto Place site, which is not identified for development in the emerging Plan.

Southwark Supplementary Planning Guidance

29. Affordable Housing SPD 2008 and draft 2011
 Development Viability SPD 2016
 Residential Design Standards SPD 2011 and technical update 2015
 Section 106 Planning Obligations and CIL SPD 2015 and 2017 Addendum

Environmental impact assessment

30. A screening assessment has been undertaken and a decision made that the proposal does not constitute EIA development (16-AP-0931). In summary, the proposed development is not considered likely to have significant effects upon the environment of more than local significance by virtue of factors such as its nature, size or location, and therefore it was concluded that an EIA would not be required. This decision was based on a review of the scheme against both the EIA Regulations 2011 (as amended) and the European Commission guidance.

Principle of development

31. The former fire station activities and local fire and rescue services have been consolidated into alternative premises at Albert Embankment and the former museum has reopened at a site on Lambeth High Street. The London Fire Authority now

consider the Southwark Bridge Road and Grotto Place sites to be surplus to their requirements and that services can be adequately delivered from the alternative premises. Given the relocation of the service there is no objection to the loss of this function at this site and this is reflected in the designation of the site in the draft New Southwark Plan

Provision of a new school

32. The council's cabinet receives regular reports on the school places planning strategy at both primary and secondary level. The most recent report, dated October 2017, advised Members of the projected shortfall in secondary school places from September 2018 onwards. The school places projections assume the opening of the Haberdashers Askes school (Borough Academy) at the Fire Station site in September 2019 – even with this, the report expects an acute shortfall in places by 2022.
33. The Department of Education gave approval to open the Haberdashers Askes school from September 2018 onwards, which was later revised to an opening date of September 2019. Further delays in a planning decision, or construction, would push this back to September 2020 or later, affecting overall place availability, as well as directly affecting the parents with children at local primary schools hoping for a co-educational local secondary school to move onto.
34. There is therefore a pressing need to meet the demand for secondary school places and accordingly, the Fire station site has an important strategic role in meeting this need. The Education Act 1996 places a duty on local authorities to ensure that there are enough school places to meet needs.
35. The Government's National Planning Policy Framework (2012) gives clear support for new schools, stating at paragraph 72 that 'the government attached great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities' and that local planning authorities should 'give great weight to the need to create, expand or alter schools'.
36. Within the London Plan, policy 3.18 'Education Facilities' states that the Mayor will support the provision of new schools to meet the demands of a growing and changing population.
37. Saved policy 2.4 'Educational deficiency' of the Southwark Plan and SP6 'Places for learning, enjoyment and healthy lifestyles' of the Core Strategy both give support to the provision of new schools.
38. It is clear, therefore, that there is strong support at national, regional and local levels for the provision of new schools, and clear evidence of need in this area. This is reflected in the designation of the site in the emerging New Southwark Plan. The provision of a school is a positive aspect of this overall proposal which weighs heavily in its favour when considering the overall balance of benefits in the scheme.

Development on Borough Open Land, and other open space

39. The development of the sports hall on the Grotto Place site, the majority of which is designated as Borough Open Land, is contrary to Southwark Plan saved policy 3.26 (Borough Open Land) which states that.
40. Within Borough Open Land planning permission will not be granted for development unless:
 - i. It is ancillary to the use of the open space; and,

- ii. It is small in scale; and,
 - iii. It does not detract from the site's open nature and character; and
 - iv. It is required to enhance activities associated with the particular open space; and
 - v. It positively contributes to the setting and quality of the open space.
41. Similar restrictions apply to Grotto Podiums which is to the small patch of land to the south-west of the site and is designated as Other Open Space.
 42. Since construction of the new sports hall is not strictly ancillary to the open space use (as it would often be used independently of the MUGA or park area), and it could not be said to be small scale, permission would only be granted if there are sufficient other benefits to justify an exception to the policy.
 43. Inclusion of the Grotto Place site into the school development significantly eased pressure on the main site, particularly in resolving the difficulties of incorporating a large format sports hall into that development. This resulted in an improved and more spacious school layout. The sports hall is itself high quality, and would be available not just to pupils but would also be open to the local community when not required by the school. Alongside the sports hall, the Grotto site would include a Multi-Use Games court (MUGA) for sports such as basketball, netball and 5-a-side football. Like the sports hall, this would be available for public use when not in use by the school.
 44. The Grotto site also provides most of the required cycle parking for the school. The stands are located relatively discretely close to the MUGA.
 45. The balance of the space will be laid out as open space, used as a school recreation area during break and lunch times (and potentially during after school clubs) and as a public park at other times, including at weekends and during school holidays. Since the general public have no access to the site at present, this new public access, to an attractive landscaped area, is a significant benefit arising from the proposals. Bankside Open Spaces Trust have been working with Haberdashers on designs for the open space, and the issues relating to implementation and management of the space (and the sports hall) are discussed further below.
 46. A number of residents have objected to the application due to concerns that the use of the open space will cause noise and disturbance. As well as opposing the principle of the more active use of the space, residents have requested that the space and the sports hall be closed early in the evening. Potential hours of use remain under discussion, but in principle it is recommended that the benefits of maximising use of any new open space should be recognised, and the park should be used broadly in line with the Councils normal park management arrangements of remaining open until dusk, which in high summer may be up to 10pm. Similar hours could apply to the sports hall.
 47. Although the sports hall is a substantial structure, a significant proportion of the land would remain as open space or games areas. The sports facilities are a crucial element of the overall school facilities, and should be welcomed for their role in improving health, encouraging participation in sport, and tackling obesity in children and teenagers. The access by the public to a site which currently closed to the general public is a major benefit, as is the scope to improve both the appearance and the biodiversity value of the land. It is therefore concluded that there are material issues with sufficient weight to justify construction of the sports hall on designated open space.
 48. It is noted that the retained Fire Authority car park on the eastern edge of the space (adjacent to Sturge Street) falls outside of the application boundary.

Residential use

49. The proposal would provide 199 new homes on the southern part of the main site.
50. London Plan Policy 3.3 'Increasing Housing Supply' sets a minimum target of 27,362 additional homes to be provided in Southwark over a period from 2015-2025. A specific target of 1,900 homes is given for the Opportunity Area. Strategic Policy 5 of the Core Strategy seeks high quality new homes in attractive environments. It states that development will provide as much housing as possible whilst also making sure that there is enough land for other types of development. The policy sets a target of 24,450 net new homes between 2011 and 2026. A key objective is to provide as much new housing as possible and create places where people would want to live.
51. The new homes would contribute to meeting an identified housing need, and also enable the developer, Hadston, to provide support for the school development. Issues relating to affordable housing and the quality of the housing are discussed further below.



Commercial unit and Gym

52. The provision of a single commercial unit on the Southwark Bridge Road frontage is welcomed as a contribution to activating the street and supporting the wider town centre. The unit, which may be a shop, office, leisure or cafe/restaurant use, would benefit from the large glazed openings fitted to the current loading bay doors. This is a small element of the overall development, is acceptable in a town centre location, and due to its limited size would be unlikely to raise any amenity concerns.
53. A small gym is proposed at first floor level, which is primarily aimed at residents but would also be available to the public. This use would be consistent with the 'other acceptable uses' in the draft New Southwark Plan designation, and is an appropriate town centre use.

Conclusion on land use issues

54. Provision of a school and residential use is consistent with the designation of the site in the submission version of the New Southwark Plan. Whilst this emerging document can be given limited weight at present, it does reflect the objectives of the council and the clear evidence of need for a new school in this area. Existing policies at all levels also strongly support new schools, and it is clear from the number of representations in support of the application that local families see this as a key opportunity to have their children educated locally in a mixed sex, non-selective, secular school. Good schools encourage families to move to and stay in areas and help build strong and supportive communities. A number of respondents have objected to the school being

located in what they see as a residential area, and raised concerns about noise, disruption, anti-social behaviour, and pressure on local transport and shops. However, schools need to be integrated into the communities they serve, and the disruption caused at the beginning and end of the school day (only sixth formers would usually be able to leave the school premises unaccompanied within school hours) would be of a limited duration and should not be assumed to be harmful.

55. The development of the sports hall on designated open space can be justified in the special circumstances of this case, and would have the benefit of bringing public access (outside school hours) to land which is currently not accessible.
56. The housing and commercial uses and acceptable in meeting recognised needs, and a high density mixed use scheme is appropriate in the prominent site with a Central London Opportunity area.

Urban design

57. The site is not in a conservation area but includes a number of designated heritage assets. Winchester House (originally built as a Workhouse) and No 94 Southwark Bridge Road (including the Engine House and South Block) are both Listed Grade II.
58. The key design policies that apply to this site are concerned with ensuring that new development responds appropriate to the established built context (Southwark Plan saved policy 3.13) is of a high standard (saved policy 3.12) and respects heritage assets (saved policies 3.17 and 3.18). The site has a number of constraints, which has informed the approach to development. These include the listed buildings, existing built context, established mature trees, archaeology, school requirements and restrictions to development on Open Land. From the initial concept, the development team sought to minimise the impact on historic fabric, prioritise the beneficial re-use of the Listed buildings, and arrange uses on the site which were the best 'fit' with the spaces and character of the historic buildings. The applicant had lengthy pre-application discussions with council officers and negotiations have continued through the application process.

Access and site layout

59. The principle of using the northern part of the Main site (predominately Winchester House) for the school buildings, incorporating new build elements, is supported. This approach allows the fullest and most sensitive reuse of the listed buildings. A new 2-storey wing is constructed towards Southwark Bridge Road which will form the main entrance to the school and connects to the main movement spine for the school which is arranged around the central courtyard. The main teaching spaces are accommodated in a new structure behind the retained historic western façade to the courtyard and a new 4-storey southern block which completes the court.
60. The main pupil and visitor access to the school will be from Southwark Bridge Road, which will present a distinctive 'face' to the school. Staff would use the main pupil entrances but will also be able to use an existing pedestrian entrance on Pepper Street. No pupil access is proposed from Pepper Street. A secondary access point is provided for pupils on Sawyer Street that will be used through the school day to provide easy access to the sports facilities on the Grotto Site.
61. The layout of the school has been designed in accordance with the Department for Education's Building Bulletin 103 (BB103) in terms of the design of school areas, quantity of space, occupancy, spaces standard and key technical and environmental performance standards. The design of the school and its facilities is supported by both the Education and Skills Funding Agency and Haberdashers' Aske's Federation and

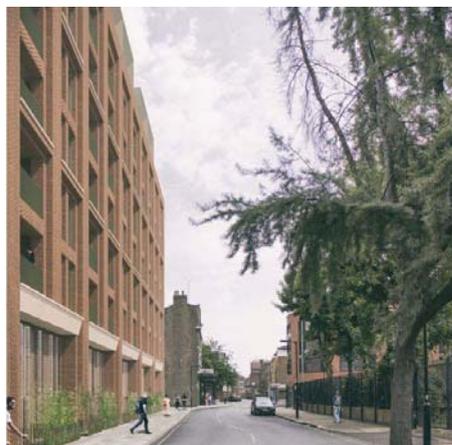
for this reason considered acceptable in terms of school layout and design.

62. The residential component of the scheme takes the form of a perimeter block arranged along the edge of Sawyer Street at the southern and western edges of the main Fire Station site behind the Grade II Listed Building. Most of the accommodation is arranged in three large connected blocks that range in height from 7 to 10-storeys. In addition, residential units are accommodated in the converted and extended Engine House, South and Cottage blocks. At the points where the school and residential interface, such as the Engine House, the buildings contain a mix of school uses (on the lower floors) and residential above. The flats surround a central courtyard which is accessible by pedestrians from Southwark Bridge Road and also by vehicles from Sawyer Street. The main entrance to the residential flats would be from the internal courtyard, although there are 7 maisonettes with front doors onto Sawyer Street which would improve animation and passive surveillance here which is welcomed.



Scale, massing and built form

63. Many of the objections received have been in response to the scale of the residential buildings, which objectors considered to be too high, out of context with the area, and overbearing in relation to local views and the established character. To a lesser extent this issue was also raised in relation to the school extensions, although here the main objection was to the impact on residents' outlook, daylight and privacy.
64. The new residential buildings would rise to a maximum of 10 storeys, reducing to 8 and then 7 storeys on the blocks on the northern part of Sawyer Street. The building is arranged with an 8 storey 'shoulder' height (parapet) with two further floors set back above this. None of the buildings are formally defined as 'tall buildings' under the terms set out in saved Southwark Plan policy 3.20, since all are below 30m in height (apart from a small lift over-runs).



65. The tallest part of the new buildings is approximately one storey higher than Moonraker Point, which although it is also 10 storeys high has lower floor to ceiling heights; Moonraker is currently the tallest building in the immediate area. Looking more widely, there are taller buildings on Union Street and further north on Southwark Bridge Road, but these are not seen in the immediate context of this site.
66. The heights of the buildings have been the subject of very lengthy negotiations following the applicant's initial ambition to create much taller buildings on the site. The impact of the current heights has been modelled in various local views (no Strategic Views are affected) and whilst the buildings are visible they do not unduly dominate or otherwise adversely affect local views. This includes the view from Mint Street Park, where the buildings do not interrupt the silhouette of the turret of Winchester House. The set back top floors reduce the apparent massing of the buildings and create a more refined roofline.
67. It is noted that this would become the tallest structure in the local area, and its length directly on the street would mean that its presence could be quite imposing in some views. However, when seen from Southwark Bridge Road, or along Sawyer Street, it would be set alongside Moonraker Point and the height differential would not be so striking that it would look significantly out of scale. On balance, in terms of impact on views and townscape, the heights of the buildings are considered acceptable. Issues relating to the impact on residential daylight, sunlight and overshadowing are set out later in the report at paragraph 105.
68. The extensions for the school use are more modest in scale, and do not have significant impact on views within Sawyer Street. The new entrance wing to the school on Southwark Bridge Road is limited to two storeys in height, and in townscape terms would be acceptable; it would be read as a clearly modern structure and does not adversely affect the viewers understanding or enjoyment of the grand historic façade of Winchester House. Again, objections have been raised by residents in Copperfield Street about the impact of this building on their amenity, and this is discussed separately.



69. The new sports hall on the Grotto site is a simple brick structure which sits comfortably on the frontage of Great Suffolk Street, with a height broadly equivalent to three residential storeys. By being sited at the edge of the Grotto site, it maximises the space available for outdoor sports and recreation and can be accessed from the rear directly from Sawyer Street.

Elevational design and materials

70. The school utilises the existing listed buildings, and requires alterations and extensions to them, in addition to some limited areas of demolition. The heritage implications of these demolitions and alterations is considered later in the report; this

section sets out the design assessment of the new buildings for the school, and the residential blocks.

71. The new school buildings are generally calm and modern in design. They reflect the classical proportions and picturesque aesthetic of the original buildings and are proposed to be clad in brick with deep-set openings to ensure that they complement the existing historic context. The most significant new school building, in terms of visual impact, is the low rise entrance building fronting Southwark Bridge Road. The scale, positioning and simple design of this structure ensures that it allows Winchester House to retain its prominence.
72. The new residential blocks on Sawyer Street are designed in mansion house style and clad in red brick with stone detailing and generally reflect the proportions and colouration of the historic buildings. The base of the blocks is laid out as school accommodation to the north, and as two-storey maisonettes with front doors onto small private garden areas to the south; these lower floors have textured brick bonding and deep recessed openings which add interest to the street level facade. Balconies on the street facades are recessed to avoid them appearing over-dominant in street views. The most distinctive feature is the recessed double-height metal-clad attic storeys (ninth and tenth floors). These are grouped in paired floors and intended to emulate the dormer windows and articulated roofline of the main building. The quality of design of these features will rely to a great degree on the quality of architectural detailing and the choice of cladding materials which should be reserved by condition. The courtyard elevations are clad in a light brick, as traditionally used on mansion block courtyards, and here the balconies project to give wider views and animate the courtyard.



73. The GLA, in their Stage 1 report, expressed support for the design of the new buildings, which they considered to complement the historic Fire Station buildings and to be of a high quality and well-detailed appearance.
74. The Sports Hall on the Grotto Site has been designed as a simple crystalline box. These facilities work best when they are artificially lit windowless spaces. However, due to its prominence on Great Suffolk Street, the designers have set large areas of translucent cladding within a brick frame and base, which will allow diffused light into the hall and it will appear like a frosted box.



75. Overall, the new buildings are welcomed as well-considered additions to the townscape, creating rational and well-ordered spaces with sufficient detailing to add interest and texture to the facades. As such they comply with relevant policies, notably saved Southwark Plan policies 3.12 'Quality in Design' and 3.13 'Urban Design'.

Listed building and heritage considerations

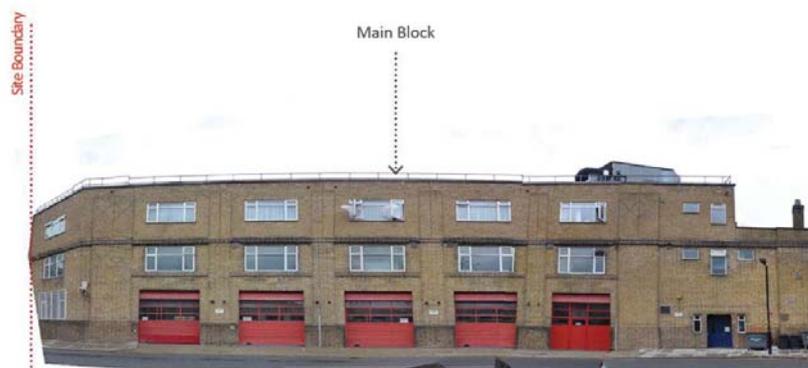
76. The council's policies in respect of heritage assets echo the requirements of the NPPF and require all development to avoid harm to heritage assets and to conserve or enhance their significance and their setting. The NPPF goes on to set out how any harm can be balanced against the benefits of the proposal and requires authorities to avoid harm and only permit such harm when it is outweighed by the public benefits of the proposal.
77. A detailed heritage assessment has been carried out detailing the impact of the scheme on local heritage assets. In the main, the key heritage impacts of the scheme are the works to Winchester House that arise from:
- the reduction in the ground levels around the edges of the building and in the courtyard;
 - the demolition of the modern front extension; and
 - the loss of historic fabric to the rear of the western range.



78. The aim of reducing the external ground levels is to make the lower ground floor more accessible particularly as it will be the new entrance level for the school. This brings with it the substantial benefit of making the whole school accessible at grade, offering equal access to all levels for students, staff and visitors. A number of challenges remain especially in respect of the levels around the existing front entrance stairs which are to be preserved, however, these can be resolved in detail and reserved by

condition.

79. The modern front extension is a discordant modern feature of Winchester House. Constructed in the 1960s or 70s it detracts from the original façade and its removal is supported since it would restore the front façade of Winchester House to its original symmetrical glory.
80. Finally, the retention of the façade to the western range, the removal of the historic structures behind it, and their replacement to create modern teaching spaces involves some loss of historic fabric. The western range of the courtyard is substantially altered and its rear was re-clad by the Fire Brigade. This wing of the former workhouse is the least significant feature of the listed building. It is simple by design (especially when compared with the highly articulated eastern range), it is not mentioned in the listing description, and its main contribution to the group of buildings has always been due its façade which forms the western edge of the central court. The loss of historic fabric is necessary due to the narrow plan form of this wing which could not accommodate the proportions of a modern teaching space and, given the narrow proportions of the site, the need to accommodate an accessible link corridor at every level. The substantial public benefits arising from this loss of historic fabric include the provision of adequate and well proportioned teaching spaces and a well connected and accessible new school. Given that its most significant features are being preserved by this proposal, the loss of historic fabric behind the façade is considered to be justified by the overwhelming public benefits of the new school and the necessity arising from the introduction of this optimal viable use.
81. The Engine House and South Block are proposed to be converted into new residential units on the upper floors. Generally, the proposal is sensitive and involves the lateral conversion of these former offices. The significance of this building is mainly in its ornate high Victorian façade and picturesque roofline. In the main, the internal conversion involves the re-use of existing spaces which is appropriate. Existing access corridors and stairs are retained and windows are proposed to be retained and repaired. The new residential units, including the converted cottages, generally meet and exceed the council's residential standards. In order to achieve good functional spaces the lateral conversion proposes the removal of historic dividing walls. This loss of internal dividing walls will not affect the external appearance of the building and does not involve the loss of features of architectural or historic significance and can be justified as a necessary localised change arising from the new use.
82. The two-storey hipped-roof range of buildings noted in the listing description and referred to in the application as the Cottage Block are proposed to be retained and converted to housing. However, the contemporary double-pitched glazed roof former paint and repair shops (the 'Main Block') on the Sawyer Street frontage are proposed to be demolished.



83. In such cases it is necessary, among other aspects, to consider whether any harm arising as a consequence of the development can be justified by the public benefits of the proposal. When we consider the harm arising from this loss of historic fabric of the former paint and repair shops, it is considered that the proposal meets the test and the loss is justified because these spaces are of a modest scale and substantially lesser significance. As a small part of the overall listed complex they are the minimum loss necessary to deliver the substantial public benefits of the school, the residential development, the improved access to the heritage and public realm. As such, it is appropriate to grant Listed Building Consent under application ref 17AP0368.

Design Review Panel (DRP)

84. The scheme was reviewed by the panel on two occasions, most recently in February 2017. At that time, the school design was not fully presented and the proposed residential units included a high proportion of single-aspect units. As a consequence the scheme was severely criticised by the Panel.
85. Since that time, the applicant has provided more information, ESFA and the operator, Haberdasher's Askes, have endorsed the school design in full. Haberdashers have provided more information to demonstrate how the school will operate on a day-to-day basis. Further, the residential layouts have been revisited and as a consequence, the proportion of dual aspect units has improved.

Conclusion on design and heritage matters

86. The design prioritised the re-use of the Listed Buildings and sought to minimise loss of historic fabric by placing uses into spaces best suited for the purpose. This is a positive aspect of the scheme, and some of the interventions, such as demolition of the modern front extension to Winchester House help to better reveal the architectural value of the building. The restoration of the historic buildings will enhance their appearance and contribution to the area. The new buildings are placed sensitively in terms of the interaction with the heritage assets, and whilst the 10 storey height of the main new residential block is higher than in typical in this area, it does not unduly dominate the townscape, and careful detailing means it can make a positive contribution to the streetscene. The development would not harm views from any of the neighbouring conservation areas. Based on the design details submitted, officers are satisfied that the new buildings would conserve and enhance the character and appearance of the listed buildings and their setting and the adjoining conservation areas.

Housing provision

87. The site is within the London Bridge, Borough and Bankside Opportunity Area where there is a minimum target of 1,900 net new homes. This application could make a welcome contribution to achieving strategic housing objectives.

Dwelling Mix

Table 1: Proposed schedule of accommodation

88.

		Number	%
Studio	<i>units:</i>	22	11
	<i>*habitable rooms:</i>	40	-
One bed	<i>units:</i>	91	46

	<i>*habitable rooms:</i>	203	-
Two bed	<i>units:</i>	78	39
	<i>*habitable rooms:</i>	266	-
Three bed	<i>units:</i>	8	4%
	<i>*habitable rooms:</i>	40	-
Total	<i>units:</i>	199	100
	<i>*habitable rooms:</i>	515	-

*Rooms larger than 27.5 sq metres have been counted as at least two.

89. Strategic Policy 7 of the Core Strategy requires at least 20% of dwellings to have 3 or more rooms, 60% to have 2 or more bedrooms and a maximum of 5% are permitted to be studios. Saved policy 4.3 requires at least 10% of new dwellings to be wheelchair accessible.
90. Whilst a mix of studio, 1, 2, 3 bed and wheelchair dwellings are proposed that will provide housing choice for future occupiers, the mix is skewed significantly towards smaller units. Fewer two bed (39%) and three bed (4%) units will be delivered, and many more studios (11%), than is normally expected. The main reason given for the departure from the expected mix is that the number and mix is required to achieve a viable scheme (as smaller flats generally command a higher value relative to floor area). This lack of compliance with policy and impact on the range of unit types is a shortcoming of the application which must be weighed against its benefits. Only if Members place significant weight on the delivery of the wider scheme could this mix be justified. In their Stage 1 report the GLA took the view that this could be justified and on balance officers would concur with this view.

Affordable housing

91. Strategic Policy 6 requires major developments to provide a minimum of 35% affordable housing in this area with a 70:30 tenure split between social rented and intermediate housing. London Plan Policy 3.12 seeks new development to secure the maximum reasonable amount of affordable housing is provided.
92. As originally submitted, the application included no affordable housing – all flats were for market sale. The applicants submitted a financial viability appraisal which stated that, based on the purchase price agreed with the London Fire and Emergency Planning Authority (LFEPA) under the former Mayor for London, the development as a whole was not capable of providing affordable housing whilst remaining viable.
93. Over the past 9 months there have been extensive and complex negotiations with the applicant and the GLA. At the time of publishing this report, the negotiations have made good progress but have not been finally concluded. Given the urgency to consider the application, this report has been brought forward in advance of a final agreed position being reached. It is expected that a more definitive position will be presented in an Addendum report to Members in advance of the Committee meeting. However, as is set out in the paragraphs below, all parties have agreed that the development should now be able to support a significant amount of affordable housing, but the optimum mechanism for doing so remains under discussion.
94. In determining the application, it is important to understand the background to the valuation of the Main site. LEFPA, under Mayor Boris Johnson, agreed a purchase

price with Hadston of £54 million. This was based on the provision of a secondary school plus housing, with a clause protecting the developer from being required to provide more than 10% affordable housing. This purchase price was increased by a further £1.025 million following the relocation of the Fire Brigade Museum from the site. Based on the purchase price, the Council's expert advisors GVA, having reviewed the applicant's appraisal, agreed that the development would not be able to viably support affordable housing. However, GVA questioned whether the purchase price did properly represent the Benchmark Land Value (BLV) of the site since it did not take into account the planning policy requirement for affordable housing. In GVA's opinion, the BLV of the site, based on the applicants suggested Alternative Use Value scheme, would be in the order of £40 million.

95. Following negotiations over recent weeks, the GLA and current Mayor agreed that, given the high priority given to delivering affordable housing, the purchase price of the site should be adjusted to improve the viability of the scheme and enable the developer to properly contribute to affordable housing provision. The GLA commissioned their own advisors, GL Hearn, to carry out a 'Red Book' valuation of the site. GL Hearn has recommended an adjusted purchase price of £42,271,222 million.
96. This reduction in the purchase would enable the development to support affordable housing. The applicant is currently assessing the implications of accommodating affordable housing, including social rented housing, on site within the proposed new blocks. At this late stage, it would not be feasible to carry out any substantial redesign, therefore the need to avoid shared cores, and the current dwelling mix, do raise some issues for the scheme. Therefore it may be necessary to consider other options including an in lieu payment to fund off site delivery given the urgency to reach a conclusion on this issue.
97. At this stage, the Council is still awaiting Hadston's response to the adjusted purchase price, and their formal offer in relation to affordable housing. Hadston acknowledge the obligation to provide an appropriate contribution, and the outcome of the negotiations will be set out in the Addendum report, and the agreed obligation secured through the s106 agreement.

Density and quality of accommodation

98. Core Strategy Policy 5 sets out the expected density range for new development. Within the Central Activities Zone densities falling within the range of 650-1,100 habitable rooms per hectare (hrh) are typically indicative of an appropriate intensity of development. At 1,567 habitable rooms per hectare the proposed density falls outside the normal density range expected in this area. Notwithstanding this, maximum densities may be exceeded in opportunity areas where developments are of an exemplary standard of design and where other impacts are acceptable.
99. In terms of quality, the Residential Design Standards SPD sets out the characteristics which would signify excellent accommodation. In relation to this scheme, all units meet or exceed the minimum floorspace standards, storage space requirements, ceiling heights, ventilation and accessibility. The residents also have access to an on-site gym. However, there are a number of prescribed criteria where the scheme performs less well. For instance, only 42% of units are dual aspect, and around 6% of units are north facing single aspect, which limits their enjoyment of sunlight and potential for solar gain. There are also some shortfalls in private amenity space and play space.
100. These less positive aspects of the accommodation weigh against the scheme, but need to be considered in the context of the overall benefits of the development. The number of single aspect north facing flats is a serious shortcoming which arises from the perimeter block layout and the high number of 1 bedroom units, so is inherent to

the scheme.

Children playspace

101. The Mayor's SPG 'Providing for Children and Young People's Play and Informal Recreation (2008) recommends a standard of 10sqm of playspace per child, regardless of age, to be provided within major new developments. Based on GLA toolkit this scheme would generate a child yield of 12 which equates to the need to provide around 120 sq.m of play space for a range of children across all ages. Approximately half of this is required to be provided as door step play (for children under 5) with the remainder allocated for children older than 5 years. The scheme provides an area of doorstep play for under 5's in the residential courtyard, in compliance with policy, but no play is provided for older children. It is recognised that the new open space on the Grotto site is very conveniently located for the new residents, although it will not be available for pre-school children who may be at home during school hours. The mix of units means that the development will accommodate fewer families and given the provision of the new open space as part of the wider development the provision is, on balance, acceptable.

Pollution

102. The dominant pollution sources that could affect future occupiers of the development are noise and emissions generated from the flow of vehicles on Southwark Bridge Road. The site is also influenced by commercial uses nearby and the adjoining Public House. It is recommended that mitigation measures are secured by condition to ensure future occupiers have good internal living conditions in terms of air quality and internal noise environment. Mechanical ventilation may be required and its design and function should be secured by condition to ensure it is fit for purpose and respects the appearance of the building and local assets of heritage value.

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

103. Policy 3.2 'Impact on amenity' of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in policy 3.1 'Environmental effects' to ensure that development proposals will not cause material adverse effects on the environment and quality of life. Strategic Policy 13 'High Environmental Standards' of the Core Strategy requires developments to avoid amenity and environmental problems that affect how we enjoy the environment in which we live and work.
104. A development of this scale clearly has the potential to impact on the environment and the quality of life for neighbouring occupiers during construction and as a result of the completed development. There are a number of properties nearby which have been examined for a range of potential impacts, the most sensitive of which are identified within this part of the report.

Daylight and sunlight

105. A daylight, sunlight and overshadowing analysis was submitted with the proposal to assess the impact of the scheme on nearby residential properties. The assessment was carried out in accordance with the Building Research Establishment (BRE) 2011 guidelines as specified in adopted Residential Guidance. 452 rooms within 30 residential properties surrounding the site were tested, situated at:

- 69 -75 Great Suffolk Street
- The Wireworks
- 5-9 Sawyer Street
- 15-19 Pepper Street
- 3-25B Copperfield Street
- 1-12 Winchester Buildings
- 92 Southwark Bridge Road
- 98-118 Southwark Bridge Road
- 175 Southwark Bridge Road
- 108 Southwark Bridge Road
- Moonraker Point

Assessment of daylight and sunlight impacts

106. Three tests were applied to assess the impacts at these properties. These were vertical sky component, a no sky line assessment and annual probable sunshine hours. An overview of the tests and their relevance is set out in the table below:

Test	Target	Description
Vertical Sky Component (VSC)	Less than 0.8 reduction in VSC	This assessment measures light at single point on a window. The British Research Establishment advises that windows of neighbouring properties should achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.
No Sky Line (NSL)	Less than 0.8 reduction in NSL	This assessment estimates the distribution of light within a room taking account the area of a room at desk height that can see the sky. The BRE guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. a 20% reduction).
Annual Probable Sunshine Hours	Retain >25% of Total APSH or at least 0.8% of 'Pre-Development Value'	This test estimates the availability of sunlight. The BRE guidelines state that if 'post-development' the available sunlight hours are both less than the 25% of the total and less than 0.8 times the 'pre-development' value, either over the whole year or just within the winter months, then the occupants of the existing building will notice the loss of sunlight

107. The technical analysis shows that the scheme performs well in relation to daylight and sunlight impacts, and 439 of the 452 rooms assessed met the tests in relation to VSC or NSL. This suggests that these rooms would not see a noticeable impact on their daylight amenity. This level of compliance is good for a central London area. The properties which experience a loss outside of the BRE recommended targets are set out below. The most significant impacts are on Moonraker Point and 98-118 Southwark Bridge Road. When examined in relation to the No Sky Line, all except a small number of rooms within Moonraker Point passed the test set by the BRE. None of the Copperfield Street cottages experience a loss which would be described by the BRE as 'noticeable'. These impacts are discussed in further detail in the following paragraphs.

69 Great Suffolk Street



108. This is an end of terrace residential building which faces onto the Grotto site and opposite the new Sports Hall. The windows affected are west facing and currently overlook an open site which explains why the windows currently receive high levels of daylight and are affected by the new structures. The most noticeable effects will be at ground and first floor level which will experience reductions of around 30%. The expected level of VSC to be retained at these windows would be at least 19%.

5-9 Sawyer Street



109. This is a mid-terrace residential property situated to the north east of the proposed development, with their rear elevation facing the new school. The windows affected at this property are east facing and currently overlook the main fire station site where there is currently a distance of separation of around 17 metres. Of the 85 windows assessed 84 experience full compliance with BRE criteria. The one window which experiences a reduction is serves a room which also has other windows. When this room is assessed against the second daylighting methodology, the No Sky Line (NSL) test the room fully complies with BRE guidance.
110. A technical analysis of sunlight shows that 15 of the 19 rooms assessed at this property met the requirement for annual sunlight hours, and where rooms did not meet the target levels the degree of the transgression is not significant.

1-8 Winchester Buildings

111. Of the 28 windows tested in this building, 27 met the BRE recommendations in terms of VSC. Of the one window that did not, the loss was only marginally outside the

target range, and as such the impact is not significant.

98-118 Southwark Bridge Road



112. This is a mixed use building with commercial offices at lower levels and residential above. The windows affected are west facing and directly overlook the Grotto site. When assessed against the VSC criteria 103 of the 121 windows assessed (85%) achieve full compliance to the BRE guidelines. The 18 remaining windows serve 12 rooms which when assessed against the No Sky Line test comply with the BRE guidelines. For these reasons the impacts at these properties is considered to be acceptable.
113. When assessed against sunlight criteria, all tested rooms show full compliance to the BRE guidelines. The impacts of the proposed scheme on the sunlight conditions are therefore considered to be acceptable.

Moonraker Point



114. Moonraker Point is a student accommodation block located immediately to the west of the development site and adjacent to the Grotto site. When assessed against the VSC criteria 155 of the 185 windows assessed (84%) achieve full compliance to the BRE guidelines. The remaining 30 windows serve 24 rooms which when assessed against the No Sky Line test, 12 rooms show full compliance with the BRE guidelines. The remaining 12 rooms would not meet either BRE targets for either VSC or NSL. Two of these rooms are living areas and are expected to retain a VSC of around 6%. The remaining 10 rooms are understood to be student bedrooms which are expected to retain VSC values ranging between 7% -26%.
115. When assessed against the sunlight criterion, all of the rooms relevant for assessment show full compliance to the BRE Guidelines.

Summary of daylight and sunlight impacts

116. The BRE guidelines state that the advice given is not mandatory and although it gives numerical guidelines, these should be interpreted flexibly because natural daylighting is only one of many factors in the site layout design.
117. Overall the scheme performs well against the BRE criteria, and where the affects are most severe it is at Moonraker Point student housing where expectations for daylight may be different to conventional housing. The impacts on daylight and sunlight do not raise any significant concerns and in this respect the development could be said to protect neighbours amenity, particularly bearing in mind the highly urbanised location.

Noise

118. Redevelopment as proposed will result in the a more intense use of the site at all times of days, owing to the mix of uses, the use of plant, kitchens, mechanical ventilation and servicing. Conditions requiring the submission of details are recommended to ensure noise generating plant is appropriately insulated to ensure an acceptable standard of amenity is maintained within neighbouring properties and sufficient mitigation is provided to protect against odour impacts. This may include restrictions on the times of deliveries and hours at which the school building is serviced.
119. A number of objectors have raised issues about noise (and anti-social behaviour) from pupils at the beginning and end of the school day, whilst supporter have noted that any noise is short term and not harmful. The standard school hours would be 8:30am to 3:15pm, although around a third of the pupils would stay until 4:45pm for after-school enrichment activities. The school could remain open into the evening for other clubs or community activities, but these are likely to be smaller scale.
120. Noise during the school day is unlikely to be disruptive; the outdoor spaces on the main site are within the courtyard and on the Southwark Bridge Road frontage, and the duration of use is limited.
121. The location of the school in a mixed area, and its relationship with nearby residential properties is typical of that found elsewhere in the borough, and the level of noise and its duration should not significantly change the amenity for neighbours.

Privacy and overlooking

122. The scheme has been designed to minimise windows close to its boundaries. The flats and cottages on Copperfield Street have very short rear gardens and the new 2 storey wing would be close to their boundary. However, this does not have windows on the rear elevation, so there will be no new opportunities for obtrusive overlooking. On other boundaries, the distances are sufficient to preclude overlooking affecting residential privacy.
123. The proximity of the new buildings to the Copperfield Street and Southwark Bridge Road properties will impact on outlook from the rear windows and an increased sense of enclosure at the rear. However, the scale of the building has been kept deliberately low (and was reduced following comments from residents) and on balance the enclosure should not feel oppressive. Similar impacts are seen at the rear of 5-9 Sawyer Street but these are already enclosed to some degree by the Fire station buildings.

Demolition and construction impacts

124. The proposed scheme will involve construction activities which have the potential to impact on residential occupiers nearby. A condition requiring the submission of a

construction management plan is recommended that would cover all phases of the development to ensure the environmental effects of construction are minimised and appropriate consideration is given to safeguard the amenity neighbouring properties and land uses.

Transport issues

125. Saved policy 5.1 seeks to ensure that development is located near transport nodes sustainable transport options are promoted.
126. The site is highly accessible by public transport owing to it being close to Borough Underground Station which is served by the Northern Line, and Southwark Tube Station which is served by the Jubilee Line. 14 bus routes run close to the site and the Cycle Superhighway 7 (CS7) pass along Southwark Bridge Road. Nearby there are cycle hire docking stations on Great Suffolk Street (16 spaces) and Union Street (9 spaces). Trip generation data forecasts that the majority of trips generated by this development will be made by foot and public transport which is to be expected for such a centrally located site. Residential trips are unlikely to be significant as the scheme is car free which will be secured by condition. The commercial unit is also not of a size that is expected to generate significant trips to and from the site. Notwithstanding this, it is recognised that footfall will increase significantly around the site, particularly at the start and end of the school days as well as at break and lunch times when pupils access the Grotto site. As part of their Stage 1 response, Transport for London requested an updated assessment of the scheme's impact on local bus services as these were considered to be an underestimate, and a revised assessment of pedestrian comfort levels on Southwark Bridge Road, taking account of students waiting at bus stops and pedestrian crossings.

Impact of the new school

127. Officers have reviewed the conclusions of the updated impact assessment which assumes a higher proportion of pupils (30%) arriving by bus. Due to the high frequency of services in the area and range of bus routes it is likely that arrival at the site by pupils will be staggered and across multiple buses and for this reason its reasonable to conclude that the impact is likely to be worst in the AM peak but in broad terms acceptable. Cycle parking is proposed on the Grotto site which will help reduce the impact of the scheme on public transport capacity.
128. Given the anticipated increase in footfall in the area a new signalised controlled pedestrian crossing is proposed on Southwark Bridge Road near its junction with Marshalsea Road to improve the safety and walking environment for the high volumes anticipated to arrive during the AM peak as well as manage the follow of traffic. It's design and positioning has been reviewed by officers and is considered acceptable subject to detailed design considerations and the timing of its implementation which should be secured through a legal agreement. Taking account of Transport for London's guidance on pedestrian comfort, officers are also satisfied that the updated assessment of school pedestrian movements sufficiently demonstrates that Southwark Bridge Road can accommodate the forecast increase in demand during peak periods.

Car parking

129. No dedicated car parking is proposed for the school or the small commercial unit given the high accessibility of the site using public transport. Residential occupiers will not be eligible for parking permits and no car parking will be provided other than the 3 on-site spaces provided for wheelchair units within the residential courtyard. This low level of car parking reduces traffic congestion and encourages use of non-car modes in accordance with saved policy 5.3 of the Southwark Plan.

Cycle parking

130. London Plan Policy 6.9 (Cycling) sets out standards for cycle parking which exceed adopted local policy requirements. For this development the following applies:
- School cycle parking standards - 1 space per 8 staff + 1 per 8 students, long stay and 1 per 100 students, short stay.
 - Residential cycle parking - 1 per 1 bed and 2 per all other, long stay. Short stay 1 per 40 units.
 - Commercial - 1 space per 175m², long stay. 1 space per 40m² short stay.

School

131. Based on the standards above a minimum total of around 170 (15 + 144 +11) cycle parking spaces is required to be provided for the school. Cycle parking will be delivered on the Grotto site away from the main school buildings owing to space constraints and taking account of heritage considerations. This will require the pupils to cross Sawyer Street to enter the school which is not ideal but is on balance acceptable. A lesser amount of cycle parking than would normally be required may be acceptable on the Grotto site in order to maintain the open character of Borough Open Land. It is considered that an appropriate balance has been struck between these competing policy objectives of preserving the historic environment, cycle parking provision and the maintaining the open character of the Grotto site.

Residential

132. Based on the London Plan a minimum total of around 290 (285 + 5) cycle parking spaces is required to be provided for the new dwellings. Currently around 282 spaces are proposed that will be a mix of mix of Sheffield stands, double stacker and 'spacepods'. These spaces are provided at ground floor level and are accessible from residential cores and the courtyard. On balance the level of provision proposed is acceptable given the constraints of the site.

Commercial

133. Based on the London Plan a minimum of 7 spaces (1+ 6) should be provided. The applicant has been unable to provide any dedicated spaces for this unit owing to listed building constraints.

Servicing and deliveries

134. Servicing in connection with the school and residential units is proposed to take place on-site within the servicing yard accessed off Sawyer Street. There are no objections to the principle of this arrangement given the constraints of the site. Servicing may also take place on Sawyer Street where currently there is an extended dropped curb for fire engine access. The applicant proposes to either create a formal servicing bay or double yellow lines that can on occasion accommodate coaches. Detailed design discussions are ongoing with the council's Highways Team to secure an acceptable design solution. The principle of both options are acceptable and would not impact on local car parking capacity. It is recommended that the detailed design and implementation of these works is secured by a legal agreement.
135. Servicing in connection with the commercial unit will take place on-street on Sawyer Street similar to the arrangement set out above.

136. Servicing in connection with the Sports Hall will take place on street on Great Suffolk Street.

Construction

137. No details have been given with regard to the total construction period expected from start to finish. The site fronts the Cycle Superhighway 7, construction vehicles would be required to cross the CS7 which is a potential risk to cyclists. The applicant has not provided any details with regard to the trips expected per day and during peak periods. Details are required detailing the hours of expected operation and the routes construction vehicles are expected to take when visiting the site. Details are required with regard to loading/unloading. Details will be required with regard to how the book-in system will be managed. Details will be required with regard to how the applicant will manage should a delivery over run or will be late. The applicant will be required to provide details if they are to provide a holding area and where they will expect the holding area to be located. The applicant will be required to consult the council and local residents on the final construction routes and this will provide an opportunity to further develop ways to reduce any potential cumulative effects arising during construction.

Impact on trees

138. London Plan (Policy 7.21) states that existing trees of value should be retained and any loss as the result of development should be replaced following the principle of the 'right place, right tree'. The planting of additional trees is encouraged and in particular large- canopied species.
139. A tree survey was submitted which identifies trees in and around the site, setting out trees to be retained, new planting and trees proposed for removal. This identifies trees as Category A (high value), category B (moderate value), category C (low value) and category U (unsuitable for retention). Particular trees of value include the group of Norway Maple and, London Plane trees on Sturge Street Car Park that are subject to a Tree Preservation Order. However, no trees on the application site were classified as category A. A summary of trees likely to be removed is set out in the table below.

Category	Number of trees	Trees to be retained	Trees to be removed
A	0	-	-
B	29	20	9
C	12	4	8
U	2	0	2
Total	43	24	-19

140. On the main Fire station site 4 grade B trees would be removed along Southwark Bridge Road making way for new teaching and assembly hall wing and one tree removed within the courtyard. On the Grotto site, a group of semi-mature Norway Maple, Ash and two London Plane trees will be removed to make way for a new Sports Hall. The loss of trees can be justified to accommodate the development provided that an adequate replacement strategy is in place. The plans show 9 new trees on the main site, and the plans (not yet finalised) for the Grotto site open space has the potential to accommodate several replacement trees. . Replacement tree planning should be secured as part of a planning agreement, and only in the event that full replacement of canopy cover is not possible should a commuted sum to facilitate off-site planting be secured

Sustainable development implications

Energy

141. London Plan Policies 5.2 and 5.3 state that development proposals should make the fullest contribution to minimising carbon dioxide emissions. For residential buildings an improvement on Part L (2013) Building Regulations of 100% is expected and a target of 35% is required for non-domestic buildings. Buildings are encouraged to be designed to use Combined Heat and Power (London Plan Policy 5.6) incorporate renewables (London Plan Policy 5.7) and to reduce the potential for overheating (London Plan Policy 5.9).
142. An energy strategy was submitted which includes the proposal to install combined Heat and Power (CHP) to serve the school, commercial tenants and the residential building. Solar photo-voltaic panels are proposed on the roof the residential blocks and the Grotto Site Sports Hall maximising the capacity for on-site energy generation from renewables. Based on this approach the strategy has demonstrated that the carbon reduction target has been achieved for the non-residential component and for the overall site, a reduction of 43.1% above building regulations. Carbon off-setting will be required to off-set the 107 tonnes of carbon per annum required to achieve the 'zero carbon' target for residential dwellings. This equates to a contribution of £192,343 towards the council's carbon offset fund that, it is recommended, should be secured by a legal agreement.

Land contamination

143. The potential for ground contamination to be present has been assessed and full intrusive surveys are recommended to assess the actual nature, presence and extent of contamination in order to establish the risk to future occupiers. Conditions are recommended to secure appropriate details and appropriate remediation.

Flood risk

144. The site is within Flood Zone 3 which is considered to be 'high risk' in terms of potential for flooding. Notwithstanding this, the design of the building and location of uses is appropriate as a school, residential and commercial uses. Conditions are recommended to ensure construction activity such as piling, and the design of foundations would not pose a pollution risk to ground water or increase the risk to surface water flooding.

Ecology

145. The applicant carried out a Bat survey prior to the submission of the application and no bat activity was recorded. The council's ecology officer is satisfied that no further surveys are required. Whilst the application does involve a loss of open land, this is of low quality at present. Conditions should be imposed to secure ecological enhancement of the space in line with saved Southwark Plan policy 3.28 'Biodiversity'.

Archaeology

146. The site is not within an Archaeological Priority Zone (APZ) but historic records indicate that part of the site was used as a burial ground in connection with St Saviours Workhouse prior to its use as a fire station. That burial ground was consecrated and concerns have been raised that the scheme may disturb buried human remains of archaeological significance and that in mitigation some form of memorial plaque be erected, or other act of significance in memorial to any bodies

found at the site.

147. An archaeological evaluation and impact statement has been submitted which reports the findings of a series of test trenches dug at the site. Using historic records the applicant has established the depth at which human remains and grave soils have been found at the site (between 2.52 AOD and 2.68 AOD) and officers have compared this with depth of landscaping proposed at the site (2.795 AOD). The impact statement shows that the deepest point of the proposed landscaping sits above the level of historic graveyard (2.52 AOD) based on known records of the site. Based on this analysis, the extent of the landscaping sits above the burial ground so it appears that there is potential scope to ensure safeguards are in place to preserve the majority of the burial ground in situ – beneath the new landscaping. Notwithstanding this, records showing the boundary of the former burial ground are historic and stylised and so may be not precise. For this reason it is possible, that there may be other parts of the site that contain human remains and so it will be necessary to determine if burial remains survive at a higher level elsewhere on the site. In planning terms, officers are broadly satisfied that there is sufficient information at this stage to establish that the development is not likely to cause such harm to historic remains of significance at the site to that extent that would warrant the refusal of planning permission, provided that appropriate conditions are applied. The conditions will required further evaluation trenching to establish whether burial deposits beyond into other parts of the site. This will be supported with further details showing the complete scope and arrangement of the foundation design and all ground works, archaeological mitigation works and a programme of archaeological building recording to ensure operations are undertaken to a suitable standard.
148. The site is consecrated and based on historical records there is an absence of any evidence to suggest that has been deconsecrated. In absence of evidence the legal effects of consecration remain and for this reason any development on the historic burial ground will be subject to Faculty Jurisdiction – namely the Church of England. In planning terms this means that, Members can, if minded, grant planning permission but before commencement on site, the applicant will not be able to build out that part of the development situated on the burial ground/consecrated land until (i) they have received approval from the Consistory Court (this is an ecclesiastical court established in each Church of England diocese) to build over or relocate the human remains; and (ii) they have dealt with all other ecclesiastical law issues.

Planning obligations (S.106 undertaking or agreement)

149.

Planning Obligation	Mitigation	Applicant position
Affordable Housing	An affordable housing contribution will be made, details of which will follow in an Addendum report.	Agreed
School	Commitment to early delivery of the school	Agreed
Green Fund	£192,343 (indexed) based on shortfall of 106.9 tonnes of carbon.	Agreed.
Employment during construction	This development would be expected to deliver 60 sustained jobs to unemployed Southwark residents, 60 short courses, and take on 15 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution of	Agreed.

	<p>£289,500 for the council to provide this service.</p> <p>An employment, skills and business support plan will be secured that will set out how this will be achieved, targets for construction skills and employment outputs, including apprenticeships.</p>	
Child play equipment	A financial contribution (indexed) towards playspace for children linked with residential component of the development. Final amount will be based on the tenure and mix of dwellings.	Agreed.
Grotto Arrangements for Community Use	<p>– Hours of Community Access During School Term Time</p> <ul style="list-style-type: none"> • Mon - Fri: 17:00 hrs to 22:00 hrs • Sat: 0800 hrs to 2200 hrs • Sun: 0800 hrs to 2200 hrs <p>Hours of Community Access Out of School Term Time</p> <ul style="list-style-type: none"> • Mon - Fri: 08:00 hrs to 22:00 hrs • Sat: 0800 hrs to 2200 hrs • Sun: 0800 hrs to 2200 hrs <p>School Use During Term time</p> <ul style="list-style-type: none"> • Mon - Fri: 0800 hrs to 17:00 hrs <p>School Holidays</p> <ul style="list-style-type: none"> • No school use 	Agreed
Grotto Shared Use Agreement	<p>A Shared Use Agreement Management Plan which secures:</p> <p>Access for the general public, local community to the public open space and facilities on the Grotto Site including the sports centre and MUGA,</p> <p>Exclusive access for the school to the shared open space, the sports centre and MUGA at appropriate times</p> <p>Public access at all times to the Grotto Podiums</p> <p>Details of the mechanism to ensure sustained funding is made available to ensure the effective management and operation of the Grotto Site for the school and the general public</p>	Agreed.

	<p>To ensure that the site is delivered as an asset for both the school and the general public</p> <p>That the parties agree to Shared Use Agreement undertake regular consultation with user groups, and all interested stakeholders during the currency of that Agreement.</p> <p>That the resources of the landowner and user groups be used efficiently and extended for the maximum benefit of the general public and community, including the school pupils and staff.</p> <p>Clearly defined roles and responsibilities in respect of who will manage the Grotto Site, close and open the shared space, appoint and manage the operator of the sports hall and sports facilities on the site.</p>	
Grotto Design	Submission of plans and drawings showing the detailed design and timetable for phased implementation of the Grotto Site and its shared spaces within a reasonable timeframe.	Agreed.
Highways works	<p>A s278 agreement under the Highways Act 1980 will need to be agreed for any works to existing adopted Highways including:</p> <p>Repaving the footway including new kerbing fronting the development on Southwark Bridge Road, Sawyer Street using materials in accordance with Southwark's Streetscape Design Manual (Granite Natural Stone paving slabs and granite kerbs).</p> <p>Removal of redundant vehicle crossovers on Southwark Bride Road, Sawyer Street and reinstatement of footway.</p> <p>Providing an uncontrolled pedestrian crossing facility (raised table) on Sawyer Street.</p> <p>Replace any damaged gully covers</p> <p>Repair any damages to the highway within the vicinity of the development resulting from construction vehicles.</p>	Agreed.
Transport site	Proposed relocation of bus stop adjacent to	To be agreed

specific	the site on Southwark Bridge Road. Proposed signalling and crossing improvements on Southwark Bridge Road.	with TFL and Southwark Highways. Agreed with applicant
Car Parking	Permit free development to be secured. Submission of a Car Parking Management detailing the management and allocation of off-street parking bays	Agreed.
Cycle Hire	£20,000 (indexed) to expand the Great Suffolk Street docking Station.	Under discussion with TfL. To be resolved at Stage II referral. Agreed with applicant
Car Club	Provision of between a dedicated car club bay and 3 years membership for each eligible resident.	Agreed.
Trees	Tree replacement targets to be met on site. Where stem girth or canopy targets cannot be met on site a financial payment will be required that will be calculated in accordance with CAVAT and used for local tree planting.	Agreed.
Administration charge	2% of any financial payment plus a monitoring contribution that is linked with the delivery of non-financial contribution including affordable housing.	Agreed.

150. The delivery of the new sports hall, MUGA and open space is a key component of the overall scheme. As set out above, these facilities will be shared between school and community/general public. BOST and Haberdashers have worked together on designs for the open space, and BOST have indicated that the cost of delivering their preferred design would be £700-£1,000,000. However this has not been tested through a tender process.
151. Hadston have offered £275,000 to lay out the open space. This could deliver a functional space (eg site preparation, removal of old structures, laying turf, boundary fencing, benches etc) but is highly unlikely to be able to deliver BOST's preferred scheme. This would therefore require additional funding from other sources, for instance from Haberdashers foundation or grants. The Council has unallocated s106 monies available for open space projects in Bankside which could be used to supplement the funding from Hadston. However this would be subject to a separate decision by this Committee following consideration of the relative merits of this scheme and other open space needs in the area.
152. Hadston are unwilling to make a further contribution, and the question of responsibility for future maintenance is not fully resolved. Discussions are continuing and it is hoped officers will be able to present more information in the Addendum report. Given the period during which the school would have exclusive access to the open space, it would seem reasonable that they contribute significantly to its maintenance. However

Haberdashers are unlikely to be a signatory to the s106 agreement (since they do not have a formal interest in the land) and so this would not be able to be secured through the usual mechanisms.

153. In the event that a satisfactory legal agreement has not been entered into by 27th April 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

154. Section 143 of the Localism Act states that any financial contribution received as a 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 to be attached is determined by the decision maker.
155. The school and sports hall will not be liable for either the Mayoral or Southwark CIL. The sums for the residential and commercial elements will be reported in the Addendum report.

Conclusion on planning issues

156. The need for a new secondary school, and the urgency for its delivery, has been clearly demonstrated, and many local families would benefit from a new co-educational, secular school to avoid lengthy school commutes. Good schools are key to encouraging families to stay in the area, and can forge strong communities. There is a duty on local authorities to ensure sufficient school places to meet demand, and the NPPF expresses the importance the Government attaches to delivery of schools and widening of choice in education. The designation of the site for a school in the emerging New Southwark Plan can be given limited weight at this stage, but gives a clear indication of the Council's expectations for this site.
157. The objections raised to the school are noted, but it is considered that a secondary school should be located within the community that it would serve, and that the scale of disruption in the short periods at the beginning and end of the school day would not be significantly harmful.
158. The school would be high quality, and makes good use of the spaces within the Listed buildings, bringing about a positive re-use of these heritage assets. The scale of demolition and alteration required to deliver the school is justifiable, and in some respects, including removal of the unsympathetic modern extension to the front of Winchester House, would improve the appearance and heritage value of the buildings.
159. The location of the sports facilities on the Grotto Place site significantly improves the overall operation and quality of the school environment. The construction of the sports hall is contrary to saved Southwark Plan policy 3.26 relating to Borough Open Land, but an exception to this policy is justified given the wider improvements to the open space and the improved public access to the land. The amenity of neighbours can be

adequately safeguarded by conditions, although it is recommended that hours should not be unduly limited so that use of these new facilities can be maximised so far as is reasonable.

160. The negotiations about the design, implementation and future maintenance of the open space have not been fully resolved. BOST are interested in managing the space, and have done initial designs in conjunction with Haberdashers. However, the funding available from the developer would not cover the full cost of these works, and additional funds (and possibly a review of the design) would be needed to enable delivery. It is hoped officers would be able to provide further advice to the Committee in an Addendum report. The delivery of the open space, and the mechanism for managing the Sports Hall would need to be secured in the s106 agreement.
161. The housing scheme fails to comply with adopted policy in terms of its dwelling mix and density, and does not meet some of the tests for excellent accommodation from the Residential Design Standards SPD, for instance in relation to aspect. The high number of single aspect flats is a result of the deep perimeter block and the number of smaller units (which are less likely to be dual aspect). In determining the application, the Committee may give weight to the benefits of the scheme in terms of delivery of the school and conclude that this outweighs the issues in relation to housing quality. This would be consistent with the approach taken by the GLA in their Stage 1 report.
162. The height and design of the housing block has generated a number of objections. On balance it is concluded that whilst the building would be taller than other buildings in the immediate area, it would not appear discordant and would not be overly dominant in local views, including those from nearby conservation areas. The design approach is acceptable, and creates a clear hierarchy to the buildings and active frontages to Sawyer Street; the design was endorsed by the GLA.
163. The impact on neighbours' amenity in terms of daylight, sunlight, outlook and privacy have been assessed, and whilst there are some impacts beyond those recommended by the BRE, and the residents objections are noted, the impacts are not severe particularly in the context of a central London location.
164. Despite very intensive negotiations, the issue of affordable housing has not yet been fully resolved. As originally submitted, and in response to an agreed purchase price from LFEPA, the scheme could not support affordable housing. However, the current Mayor has agreed to issue a Direction to reduce the purchase price, which then enables the scheme to viably support affordable housing. Policy would usually expect affordable housing to be delivered on site; incorporating on site affordable housing into the scheme would involve some re-design and may not fit within the existing core structure. A number of options are being urgently analysed, and it is hoped that a clear position can be reported to the Committee in an Addendum to this report.
165. The site includes no dedicated parking for the school or residents (other than for disabled residents) and the impacts of children being dropped off by car will be minimised by the location in the Congestion Charging Zone and the good accessibility by public transport.
166. No other issues, including archaeology, access, trees or sustainability raise concerns which would warrant refusal of planning permission. It is therefore recommended that, in line with the requirement of the NPPF to grant planning permission for sustainable development, planning permission be granted subject to conditions, a s106 agreement and referral to the Mayor.
167. In relation to application 17AP0368 for Listed Building Consent, it is recommended that this is granted subject to conditions following issue of the planning permission. If

planning permission were to be refused, Listed Building Consent should also be refused because it would not be supported by an agreed permission for development and re-use of the site.

Community impact statement

168. 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 issues relevant to particular communities/groups likely to be affected by the proposal have been identified as the provision of educational opportunities

c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above.

Consultations

169. The developer carried out extensive pre-application consultation with the local community. In October 2015 sent letters to over 3000 local households inviting them to an initial 2 day exhibition. Since then, they have held a series of exhibitions and workshops, as well as holding smaller meetings with immediate neighbours and presenting to the Bankside Residents Forum. The events appear to have been well attended, and several changes were made to the scheme in response to the feedback.

170. Although some objectors have been critical of the consultation, it does appear to have been comprehensive and wide-ranging and to have generated useful responses which have been recorded in the Statement of Community Involvement submitted with the application.

Informal Members presentation

171. In May 2017 the applicants presented their scheme to Planning Committee and Ward Members

Statutory and neighbour consultation

172. Details of consultation and re-consultation undertaken in respect of this application is set out in Appendix 1.

Consultation replies

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

Summary of consultation responses

174. Twenty-five (25) letters were received objecting to the proposal on the following grounds:

- Fear of noise, anti-social behaviour, litter, graffiti and congestion on footpaths from pupils;

- Buildings too large for the site – detract from character of area, set a new height precedent;
- Design is bland and uninspiring;
- Impact on daylight, sunlight, privacy and outlook for residents;
- Congestion on buses, impact on traffic from drop-offs, inadequate cycle parking, impact on CS7;
- Pupils will take over Mint Street park;
- Disturbance from use of Grotto site – request limited hours of opening, access only from Great Suffolk Street, rules against music and BBQ's;
- Loss of trees;
- Lack of affordable housing;
- Too many 1 and 2 bed flats;
- Should incorporate other uses such as cinema;
- Impact on conservation areas and on the historic burial ground;
- Impact on construction on quality of life;
- Consultation material was poor.

175. Two hundred and thirty five (235) letters were received in support of the proposals. The majority of these were from local parents, stating the following reasons in support:

- Shortfall in secondary schools in the area;
- Wonderful opportunity for a mixed sex, non-religious, non-selective school for the local community;
- Would avoid long school commutes and extra traffic on roads;
- Would encourage families to stay in the area;
- Disruption from pupils would be limited to two short periods of the day;
- Support for the community sports hall.

176. Five letters making general comments on the application were received. These comments are generally supportive but raised concerns about how activities including construction would be controlled.

177. The following responses were received from statutory consultees and groups.

Greater London Authority (Support with comments)

Stage 1 Response

178. The principle of providing a new secondary school and enabling residential redevelopment on this site is strongly supported; however the application does not fully comply with the London Plan and the following matters should be addressed.

179. **Principle of development:** The provision of a new school and new housing is strongly supported.

180. **Housing:** The application is proposing 0% affordable housing. Whilst the residential development would facilitate the provision of essential social infrastructure, it must be ensured that the development provides the maximum reasonable amount of affordable housing. The applicant's viability report will be robustly scrutinised and all options will be fully explored to increase affordable housing provision. Early and late review mechanisms will be secured. The application is proposing 0% affordable housing. Whilst the residential development would facilitate the provision of essential social infrastructure, it must be ensured that the development provides the maximum reasonable amount of affordable housing. The applicant's viability report will be robustly scrutinised and all options will be fully explored to increase affordable housing provision. Early and late review mechanisms will be secured.

181. **Design and heritage:** The design of the new build elements is high quality, and the conversion and alterations to the listed buildings is supported, subject to further detailed justification for the demolition to the west wing of Winchester House.
182. **Inclusive design:** A full access strategy for the school site should be submitted and compliance secured by condition. The applicant should further justify the level of disabled parking provision for the residential uses.
183. **Climate change:** The shortfall in carbon savings for the residential element should be off-set. Additional information is required to confirm compliance with London Plan climate change policy.
184. **Transport:** The number and design of cycle parking spaces should meet London Plan standards to support an increase in cycle mode share. Revised analysis of pedestrian environment and bus capacity is required together with suitable mitigation. Servicing arrangements should be reviewed to reduce cyclist safety risks. Financial contributions, conditions and s106 obligations are required.

Historic England (No Objection)

185. No comments to make on this planning application.

Local Employment Team (Support with comments)

186. This development would be expected to deliver 60 sustained jobs to unemployed Southwark residents, 60 short courses, and take on 15 construction industry apprentices during the construction phase, or meet any shortfall through the Construction Industry Employment and Training Shortfall Contribution.
187. An employment, skills and business support plan should be provided and secured by S106.

London Underground Infrastructure Protection (No objection)

188. No comment to make on this planning application.

Network Rail (No objection)

189. No comments of relevance.

Natural England (No objection)

190. No comment to make on this planning application.

London Fire and Emergency Planning Authority (Support with comments)

191. An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire fighting purposes, will be provided.

Metropolitan Police

192. Should this application proceed, it should be able to achieve the security requirements of Secured by Design. This will require the guidance of Secured by Design Homes 2016, Secured by Design New Schools 2014 and Secured by Design Commercial Developments 2015, but recognise this can be more difficult to achieve within a Listed

building..

Thames Water

193. No comments received.

Southwark Conservation Area Advisory Group (Support with comments)

194. This site is of London-wide if not national significance due to its role as the founding headquarters of London's Fire brigade under Eyre Massey Shaw.

195. The panel appreciated the architects' efforts to respect the adjoining CA and particularly the cottages in Copperfield Street by avoiding locating high buildings at the north end of the site and use of Copperfield Street/ Pepper Street as a student entrance. Retention of the old Workhouse Courtyard was similarly welcomed as was the general treatment of the Commander's house, and its neighbour and the later Victorian fire-station buildings

196. Concern was expressed about scale and design of the proposed residential buildings, the large number of single-aspect flats and lack of affordable housing.

Human rights implications

197. 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.

198. This application has the legitimate aim of providing a new school, sports hall, residential dwellings and commercial space. 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.

199.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1396-H Application file: 17/AP/0367 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 5461 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation for 17/AP/0367 (full planning application) (to follow)
Appendix 4	Recommendation for 17/AP/0368 (listed building consent) (to follow)

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Daniel Davies, Team Leader	
Version	Final	
Dated	19 January 2018	
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		22 January 2018

Consultation undertaken

Site notice date: 16/03/2017

Press notice date: 23/03/2017

Case officer site visit date: 20/04/2017

Neighbour consultation letters sent: 06/04/2017 and 07/07/2017

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

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

Neighbour and local groups consulted:

Studio 125 Moonraker Point SE1 0FP	Third Floor 46 Loman Street SE1 0EH
Moonraker Point SE1 0FP	Second Floor 46 Loman Street SE1 0EH
Moonraker Point SE1 0FP	First Floor 46 Loman Street SE1 0EH
Global House 96-108 Great Suffolk Street SE1 0BE	School House Copperfield Street SE1 0EN
Unit C 25 Copperfield Street SE1 0EN	Units A And B Flatiron Yard SE1 1ES
Unit G 25 Copperfield Street SE1 0EN	Second Floor 53 Great Suffolk Street SE1 0DB
57 Great Suffolk Street London SE1 0BB	Ground Floor 53 Great Suffolk Street SE1 0BS
44 Loman Street London SE1 0EH	88b Southwark Bridge Road London SE1 0EX
21 Ayres Street London SE1 1ES	83 Great Suffolk Street London SE1 0BU
19 Ayres Street London SE1 1ES	Flat 104 118 Southwark Bridge Road SE1 0BQ
25 Ayres Street London SE1 1ES	Flat 103 118 Southwark Bridge Road SE1 0BQ
23 Ayres Street London SE1 1ES	Flat 106 118 Southwark Bridge Road SE1 0BQ
17 Ayres Street London SE1 1ES	Flat 105 118 Southwark Bridge Road SE1 0BQ
11 Ayres Street London SE1 1ES	Flat 102 118 Southwark Bridge Road SE1 0BQ
Unit D 25 Copperfield Street SE1 0EN	Flat 506 118 Southwark Bridge Road SE1 0BQ
15 Ayres Street London SE1 1ES	Flat 407 118 Southwark Bridge Road SE1 0BQ
13 Ayres Street London SE1 1ES	Flat 9 118 Southwark Bridge Road SE1 0BQ
Unit F 25 Copperfield Street SE1 0EN	Flat 8 118 Southwark Bridge Road SE1 0BQ
9 Winchester Buildings Copperfield Street SE1 0ER	Flat 114 118 Southwark Bridge Road SE1 0BQ
88 Southwark Bridge Road London SE1 0EX	Flat 113 118 Southwark Bridge Road SE1 0BQ
88a Southwark Bridge Road London SE1 0EX	Flat 116 118 Southwark Bridge Road SE1 0BQ
8 Winchester Buildings Copperfield Street SE1 0ER	Flat 115 118 Southwark Bridge Road SE1 0BQ

5 Winchester Buildings Copperfield Street SE1 0ER
4 Winchester Buildings Copperfield Street SE1 0ER
7 Winchester Buildings Copperfield Street SE1 0ER
6 Winchester Buildings Copperfield Street SE1 0ER
Olwen House 8-20 Loman Street SE1 0EH
137 Southwark Bridge Road London SE1 0EY
24 Pepper Street London SE1 0EB
135 Southwark Bridge Road London SE1 0EY
90 Southwark Bridge Road London SE1 0EX
133 Southwark Bridge Road London SE1 0EY
131 Southwark Bridge Road London SE1 0EY
27 Ayres Street London SE1 1ES
Basement And Ground Floor 92 Southwark Bridge Road SE1 0EX
Duthy Hall Great Guildford Street SE1 0ES
First Floor 115-129 Southwark Bridge Road SE1 0AX
Ground Floor 115-129 Southwark Bridge Road SE1 0AX
56 Great Guildford Street London SE1 0EX
Flat L Victoria Buildings SE1 0BU
Flat K Victoria Buildings SE1 0BU
Unit E The Copperfields SE1 0EN
Unit A The Copperfields SE1 0EN
Third Floor And Fourth Floor 115-129 Southwark Bridge Road SE1 0AX
Second Floor 115-129 Southwark Bridge Road SE1 0AX
Flat J Victoria Buildings SE1 0BU
Flat A Victoria Buildings SE1 0BU
First Floor And Second Floor Flat 92 Southwark Bridge Road SE1 0EX
Flat B Victoria Buildings SE1 0BU
Flat A 108 Great Guildford Street SE1 0ES
Unit F Flatiron Yard SE1 1ES
27 Clennam Street SE1 1ER
29 Ayres Street London SE1 1ES
Unit E Flatiron Yard SE1 1ES
Flat G Victoria Buildings SE1 0BU
Flat F Victoria Buildings SE1 0BU
Flat I Victoria Buildings SE1 0BU
Flat H Victoria Buildings SE1 0BU
Flat E Victoria Buildings SE1 0BU
Flat C Victoria Buildings SE1 0BU
Flat B 108 Great Guildford Street SE1 0ES
Flat D Victoria Buildings SE1 0BU
Flat C 108 Great Guildford Street SE1 0ES
3 Winchester Buildings Copperfield Street SE1 0ER
Cells Crown Court SE1 0BT
Second Floor And Mezzanine 19 Risborough Street SE1 0HG
114 Great Suffolk Street London SE1 0BE
Southwark Fire Station 94 Southwark Bridge Road SE1 0EG
Ground And First Floor 19 Risborough Street SE1 0HG
First And Second Floors 21 Risborough Street SE1 0HE
Ground Floor 21 Risborough Street SE1 0HE
Second Floor And Mezzanine 17 Risborough Street SE1 0HE
Ground And First Floor 17 Risborough Street SE1 0HE
17 Copperfield Street London SE1 0EP
15 Copperfield Street London SE1 0EP
19 Copperfield Street London SE1 0EP
13 Copperfield Street London SE1 0EP
32-36 Loman Street London SE1 0EH
Crown Court 1 Pocock Street SE1 0BT
11 Copperfield Street London SE1 0EP
10 Copperfield Street London SE1 0EP
Unit D4 Moonraker Point SE1 0FN
Jury Restaurant Crown Court SE1 0BT
Ground And First Floor 61a Great Suffolk Street SE1 0BU
4 Copperfield Street London SE1 0EP
Advocates Crown Court SE1 0BT
57b Great Suffolk Street London SE1 0BB
Studio 230 Moonraker Point SE1 0FQ
Studio 229 Moonraker Point SE1 0FQ
57a Great Suffolk Street London SE1 0BB
Flat 114 Great Suffolk Street SE1 0NS
Units 57c And 57d 57 Great Suffolk Street SE1 0BB
Ground Floor 98-118 Southwark Bridge Road SE1 0AS
Unit 6 Moonraker Point SE1 0FN
Flat First Floor Duthy Hall SE1 0ES
Fourth Floor North 93 Great Suffolk Street SE1 0BX
Unit 2 Wireworks Court SE1 0BU
Third Floor 28 Marshalsea Road SE1 1HF
Fourth Floor South 93 Great Suffolk Street SE1 0BX
21 Copperfield Street London SE1 0EP
Flat 3 Whitehill House SE1 0EQ
Flat 111 118 Southwark Bridge Road SE1 0BQ
Flat 108 118 Southwark Bridge Road SE1 0BQ
Flat 107 118 Southwark Bridge Road SE1 0BQ
Flat 110 118 Southwark Bridge Road SE1 0BQ
Flat 109 118 Southwark Bridge Road SE1 0BQ
Flat 313 118 Southwark Bridge Road SE1 0BQ
Flat 1 25b Copperfield Street SE1 0EN
Flat 414 118 Southwark Bridge Road SE1 0BQ
Flat 413 118 Southwark Bridge Road SE1 0BQ
Flat 4 28 Clennam Street SE1 1ER
Flat 1 28 Clennam Street SE1 1ER
77 Great Suffolk Street London SE1 0BU
Flat 3 28 Clennam Street SE1 1ER
Flat 2 28 Clennam Street SE1 1ER
Flat 112 118 Southwark Bridge Road SE1 0BQ
Flat 101 118 Southwark Bridge Road SE1 0BQ
Flat 302 118 Southwark Bridge Road SE1 0BQ
Flat 207 118 Southwark Bridge Road SE1 0BQ
Flat 416 118 Southwark Bridge Road SE1 0BQ
Flat 415 118 Southwark Bridge Road SE1 0BQ
Flat 417 118 Southwark Bridge Road SE1 0BQ
Studio 27 Moonraker Point SE1 0FN
Studio 26 Moonraker Point SE1 0FN
Studio 29 Moonraker Point SE1 0FN
Studio 28 Moonraker Point SE1 0FN
Studio 25 Moonraker Point SE1 0FN
Studio 22 Moonraker Point SE1 0FN
Studio 21 Moonraker Point SE1 0FN
Studio 24 Moonraker Point SE1 0FN
Studio 23 Moonraker Point SE1 0FN
Studio 36 Moonraker Point SE1 0FN
Studio 35 Moonraker Point SE1 0FN
Studio 38 Moonraker Point SE1 0FN
Studio 37 Moonraker Point SE1 0FN
Studio 34 Moonraker Point SE1 0FN
Studio 31 Moonraker Point SE1 0FN
Studio 30 Moonraker Point SE1 0FN
Studio 33 Moonraker Point SE1 0FN
Studio 32 Moonraker Point SE1 0FN
Studio 20 Moonraker Point SE1 0FN
Studio 8 Moonraker Point SE1 0FN
Studio 7 Moonraker Point SE1 0FN
Studio 10 Moonraker Point SE1 0FN
Studio 9 Moonraker Point SE1 0FN
Studio 6 Moonraker Point SE1 0FN
Studio 3 Moonraker Point SE1 0FN
Studio 2 Moonraker Point SE1 0FN
Studio 5 Moonraker Point SE1 0FN
Studio 4 Moonraker Point SE1 0FN
Studio 17 Moonraker Point SE1 0FN
Studio 16 Moonraker Point SE1 0FN
Studio 19 Moonraker Point SE1 0FN
Studio 18 Moonraker Point SE1 0FN
Studio 15 Moonraker Point SE1 0FN
Studio 12 Moonraker Point SE1 0FN
Studio 11 Moonraker Point SE1 0FN
Studio 14 Moonraker Point SE1 0FN
Studio 13 Moonraker Point SE1 0FN
Studio 39 Moonraker Point SE1 0FN
Studio 65 Moonraker Point SE1 0FN
Studio 64 Moonraker Point SE1 0FN
Studio 67 Moonraker Point SE1 0FN
Studio 66 Moonraker Point SE1 0FN
Studio 63 Moonraker Point SE1 0FN
Studio 60 Moonraker Point SE1 0FN
Studio 59 Moonraker Point SE1 0FN
Studio 62 Moonraker Point SE1 0FN
Studio 61 Moonraker Point SE1 0FN
Studio 74 Moonraker Point SE1 0FN
Studio 73 Moonraker Point SE1 0FN
Studio 76 Moonraker Point SE1 0FN
Studio 75 Moonraker Point SE1 0FN
Studio 72 Moonraker Point SE1 0FN
Studio 69 Moonraker Point SE1 0FN
Studio 68 Moonraker Point SE1 0FN
Studio 71 Moonraker Point SE1 0FN
Studio 70 Moonraker Point SE1 0FN
Studio 58 Moonraker Point SE1 0FN
Studio 46 Moonraker Point SE1 0FN

Flat 2 Whitehill House SE1 0EQ
Flat 5 Whitehill House SE1 0EQ
Flat 4 Whitehill House SE1 0EQ
Flat 19 Whitehill House SE1 0EQ
Flat 16 Whitehill House SE1 0EQ
Flat 15 Whitehill House SE1 0EQ
Flat 18 Whitehill House SE1 0EQ
Flat 17 Whitehill House SE1 0EQ
11 Winchester Buildings Copperfield Street SE1 0ER
10 Winchester Buildings Copperfield Street SE1 0ER
2 Winchester Buildings Copperfield Street SE1 0ER
12 Winchester Buildings Copperfield Street SE1 0ER
1 Winchester Buildings Copperfield Street SE1 0ER
Flat 7 Whitehill House SE1 0EQ
Flat 6 Whitehill House SE1 0EQ
Flat 9 Whitehill House SE1 0EQ
Flat 8 Whitehill House SE1 0EQ
Flat 1 Whitehill House SE1 0EQ
15 Pepper Street London SE1 0EW
9 Copperfield Street London SE1 0EP
19 Pepper Street London SE1 0EW
17 Pepper Street London SE1 0EW
7 Copperfield Street London SE1 0EP
3 Copperfield Street London SE1 0EP
23 Copperfield Street London SE1 0EP
6 Copperfield Street London SE1 0EP
5 Copperfield Street London SE1 0EP
Flat 11 Whitehill House SE1 0EQ
Flat 10 Whitehill House SE1 0EQ
Flat 14 Whitehill House SE1 0EQ
Flat 12 Whitehill House SE1 0EQ
Flat 3 2 Copperfield Street SE1 0EP
Goldsmiths Arms 96 Southwark Bridge Road SE1 0EF
55 Great Suffolk Street London SE1 0BB
Flat 2 2 Copperfield Street SE1 0EP
Flat 1 2 Copperfield Street SE1 0EP
Studio 77 Moonraker Point SE1 0FN
Flat 314 118 Southwark Bridge Road SE1 0BQ
Flat 312 118 Southwark Bridge Road SE1 0BQ
Flat 316 118 Southwark Bridge Road SE1 0BQ
Flat 315 118 Southwark Bridge Road SE1 0BQ
Flat 311 118 Southwark Bridge Road SE1 0BQ
Flat 308 118 Southwark Bridge Road SE1 0BQ
Flat 307 118 Southwark Bridge Road SE1 0BQ
Flat 310 118 Southwark Bridge Road SE1 0BQ
Flat 309 118 Southwark Bridge Road SE1 0BQ
Flat 406 118 Southwark Bridge Road SE1 0BQ
Flat 405 118 Southwark Bridge Road SE1 0BQ
Flat 409 118 Southwark Bridge Road SE1 0BQ
Flat 408 118 Southwark Bridge Road SE1 0BQ
Flat 404 118 Southwark Bridge Road SE1 0BQ
Flat 401 118 Southwark Bridge Road SE1 0BQ
Flat 317 118 Southwark Bridge Road SE1 0BQ
Flat 403 118 Southwark Bridge Road SE1 0BQ

Flat 402 118 Southwark Bridge Road SE1 0BQ
Flat 306 118 Southwark Bridge Road SE1 0BQ
Flat 209 118 Southwark Bridge Road SE1 0BQ
Flat 208 118 Southwark Bridge Road SE1 0BQ
Flat 211 118 Southwark Bridge Road SE1 0BQ
Flat 210 118 Southwark Bridge Road SE1 0BQ
Flat 206 118 Southwark Bridge Road SE1 0BQ
Flat 203 118 Southwark Bridge Road SE1 0BQ
Flat 202 118 Southwark Bridge Road SE1 0BQ
Flat 205 118 Southwark Bridge Road SE1 0BQ
Flat 204 118 Southwark Bridge Road SE1 0BQ
Flat 303 118 Southwark Bridge Road SE1 0BQ
Flat 301 118 Southwark Bridge Road SE1 0BQ
Flat 305 118 Southwark Bridge Road SE1 0BQ
Flat 304 118 Southwark Bridge Road SE1 0BQ
Flat 216 118 Southwark Bridge Road SE1 0BQ
Flat 213 118 Southwark Bridge Road SE1 0BQ
Flat 212 118 Southwark Bridge Road SE1 0BQ
Flat 215 118 Southwark Bridge Road SE1 0BQ
Flat 214 118 Southwark Bridge Road SE1 0BQ
Flat 410 118 Southwark Bridge Road SE1 0BQ
Flat 17 91 Great Suffolk Street SE1 0BX
Flat 16 91 Great Suffolk Street SE1 0BX
Flat 19 91 Great Suffolk Street SE1 0BX

Studio 45 Moonraker Point SE1 0FN
Studio 48 Moonraker Point SE1 0FN
Studio 47 Moonraker Point SE1 0FN
Studio 44 Moonraker Point SE1 0FN
Studio 41 Moonraker Point SE1 0FN
Studio 40 Moonraker Point SE1 0FN
Studio 43 Moonraker Point SE1 0FN
Studio 42 Moonraker Point SE1 0FN
Studio 55 Moonraker Point SE1 0FN
Studio 54 Moonraker Point SE1 0FN
Studio 57 Moonraker Point SE1 0FN
Studio 56 Moonraker Point SE1 0FN
Studio 53 Moonraker Point SE1 0FN
Studio 50 Moonraker Point SE1 0FN
Studio 49 Moonraker Point SE1 0FN
Studio 52 Moonraker Point SE1 0FN
Studio 51 Moonraker Point SE1 0FN
Studio 1 Moonraker Point SE1 0FN
Flat 17 59b Great Suffolk Street SE1 0BF
Flat 16 59b Great Suffolk Street SE1 0BF
Flat 19 59b Great Suffolk Street SE1 0BF
Flat 18 59b Great Suffolk Street SE1 0BF
Flat 15 59b Great Suffolk Street SE1 0BF
Flat 12 59b Great Suffolk Street SE1 0BF
Flat 11 59b Great Suffolk Street SE1 0BF
Flat 14 59b Great Suffolk Street SE1 0BF
Flat 13 59b Great Suffolk Street SE1 0BF
84 Great Suffolk Street London SE1 0BE
First Floor To Fourth Floor Pegasus House SE1 0BE
Second Floor 28 Marshalsea Road SE1 1HF
86-88 Great Suffolk Street London SE1 0BE
Ground Floor Pegasus House SE1 0BE
Flat 2 25b Copperfield Street SE1 0EN
Flat 20 59b Great Suffolk Street SE1 0BF
Flat 4 25b Copperfield Street SE1 0EN
Flat 3 25b Copperfield Street SE1 0EN
Flat 10 59b Great Suffolk Street SE1 0BF
Flat 4 59 Great Suffolk Street SE1 0BD
Flat 3 59 Great Suffolk Street SE1 0BD
Flat 6 59 Great Suffolk Street SE1 0BD
Flat 5 59 Great Suffolk Street SE1 0BD
Flat 2 59 Great Suffolk Street SE1 0BD
Unit 4 93 Great Suffolk Street SE1 0BX
Flat 1 59 Great Suffolk Street SE1 0BD
Flat 7 59b Great Suffolk Street SE1 0BF
Flat 6 59b Great Suffolk Street SE1 0BF
Flat 9 59b Great Suffolk Street SE1 0BF
Flat 8 59b Great Suffolk Street SE1 0BF
Flat 5 59b Great Suffolk Street SE1 0BF
Flat 2 59b Great Suffolk Street SE1 0BF
Flat 1 59b Great Suffolk Street SE1 0BF
Flat 4 59b Great Suffolk Street SE1 0BF
Flat 3 59b Great Suffolk Street SE1 0BF
Borough Welsh Congregational Chapel Southwark
Bridge Road SE1 0EX
19 Risborough Street London SE1 0HE
61b Great Suffolk Street London SE1 0BU
61a Great Suffolk Street London SE1 0BU
21 Risborough Street London SE1 0HG
Second Floor Global House SE1 0BE
First Floor Global House SE1 0BE
Living Accommodation SE1 1ER
Third Floor Global House SE1 0BE
Unit 2b Moonraker Point SE1 0FN
Unit 2a Moonraker Point SE1 0FN
Unit 5b Moonraker Point SE1 0FN
Unit 5a Moonraker Point SE1 0FN
Unit 7 Moonraker Point SE1 0FN
Moonraker Point Pocock Street SE1 0FN
63 Great Suffolk Street London SE1 0BU
Unit 4 Moonraker Point SE1 0FN
Unit 3 Moonraker Point SE1 0FN
Ground Floor Global House SE1 0BE
Second Floor Flat 15 Risborough Street SE1 0HE
First Floor 15 Risborough Street SE1 0HG
Fifth Floor Rear 57 Great Suffolk Street SE1 0BS
Fifth Floor Front 57 Great Suffolk Street SE1 0BS
Ground Floor 15 Risborough Street SE1 0HE
Unit F The Copperfields SE1 0EN

Flat 18 91 Great Suffolk Street SE1 0BX
Flat 15 91 Great Suffolk Street SE1 0BX
Flat 12 91 Great Suffolk Street SE1 0BX
Flat 11 91 Great Suffolk Street SE1 0BX

Flat 14 91 Great Suffolk Street SE1 0BX
Flat 13 91 Great Suffolk Street SE1 0BX
Flat 25 91 Great Suffolk Street SE1 0BX

Unit 3 93 Great Suffolk Street SE1 0BX
Unit 2 93 Great Suffolk Street SE1 0BX

Flat 24 91 Great Suffolk Street SE1 0BX
Flat 21 91 Great Suffolk Street SE1 0BX
Flat 20 91 Great Suffolk Street SE1 0BX
Flat 23 91 Great Suffolk Street SE1 0BX
Flat 22 91 Great Suffolk Street SE1 0BX
Flat 10 91 Great Suffolk Street SE1 0BX
Flat 505 118 Southwark Bridge Road SE1 0BQ
Flat 504 118 Southwark Bridge Road SE1 0BQ

Flat 508 118 Southwark Bridge Road SE1 0BQ
Flat 507 118 Southwark Bridge Road SE1 0BQ
Flat 503 118 Southwark Bridge Road SE1 0BQ
Flat 412 118 Southwark Bridge Road SE1 0BQ
Flat 411 118 Southwark Bridge Road SE1 0BQ
Flat 502 118 Southwark Bridge Road SE1 0BQ
Flat 501 118 Southwark Bridge Road SE1 0BQ
Flat 7 91 Great Suffolk Street SE1 0BX
Flat 6 91 Great Suffolk Street SE1 0BX
Flat 9 91 Great Suffolk Street SE1 0BX
Flat 8 91 Great Suffolk Street SE1 0BX
Flat 5 91 Great Suffolk Street SE1 0BX
Flat 2 91 Great Suffolk Street SE1 0BX
Flat 1 91 Great Suffolk Street SE1 0BX
Flat 4 91 Great Suffolk Street SE1 0BX
Flat 3 91 Great Suffolk Street SE1 0BX
Flat 201 118 Southwark Bridge Road SE1 0BQ
3 Wireworks Court 79 Great Suffolk Street SE1 0BU
2 Wireworks Court 79 Great Suffolk Street SE1 0BU
5 Wireworks Court 79 Great Suffolk Street SE1 0BU
4 Wireworks Court 79 Great Suffolk Street SE1 0BU
1 Wireworks Court 79 Great Suffolk Street SE1 0BU
12 Wireworks Court 79 Great Suffolk Street SE1 0BU
11 Wireworks Court 79 Great Suffolk Street SE1 0BU
14 Wireworks Court 79 Great Suffolk Street SE1 0BU
13 Wireworks Court 79 Great Suffolk Street SE1 0BU
10 Wireworks Court 79 Great Suffolk Street SE1 0BU
7 Wireworks Court 79 Great Suffolk Street SE1 0BU
6 Wireworks Court 79 Great Suffolk Street SE1 0BU
9 Wireworks Court 79 Great Suffolk Street SE1 0BU
8 Wireworks Court 79 Great Suffolk Street SE1 0BU
Ground Floor 46 Loman Street SE1 0EH
Fourth Floor 46 Loman Street SE1 0EH

First Floor 53 Great Suffolk Street SE1 0DB
First Floor 28 Marshalsea Road SE1 1HF
Ground Floor 28 Marshalsea Road SE1 1HF
Mint Street Adventure Playground Mint Street SE1 1QP
Fourth Floor 57 Great Suffolk Street SE1 0BS
Basement 28 Marshalsea Road SE1 1HF
Living Accommodation 96 Southwark Bridge Road SE1 0EF
Third Floor 57 Great Suffolk Street SE1 0BS
First Floor Unit A And Unit B 57 Great Suffolk Street SE1 0BS
Second Floor 57 Great Suffolk Street SE1 0BS
85 King William Street London EC4N 7BL
28 Browning Street London SE17 1LU
14 Berwick Court 10 Swan Street SE1 1BG
Flat 8, Thorold House London SE1 0EL
8 Thorold House Pepper Street SE10EL
20 Isaac Way London SE11EE
Flat 11, Building 100, Alaska Buildings 61 Grange Road SE1 3BA
62 Sumner Buildings Sumner Street SE1 9JY
Flat 5 Lapwing Court Swan St se11be
Apartment 301 84 Lollard Street SE11 6PX
Flat 51, 130 Webber Street London SE1 0JN
57a Lant Street London SE1 1QN
Top Flat 156 Southwark Bridge Road SE1 0DG
Flat 6 14 Weller Street SE1 1qu
Flat 6 14 Weller Street se1 1qu
7 Dauncey House Webber Row SE1 8QS
62 Reverdy Road London SE1 5QD
173b New Kent Road London SE1 4AG
103 Draper House 20 Elephant & Castle Se1 6SY
49 Sumner Buildings Sumner Street SE1 9JX
13 Walcot Square London SE11 4UB
152 Brook Drive London SE11 4te
23 The Paddock Gerrards Cross SL9 0JJ
58 Reedworth Street London SE114PQ
58 Reedworth Street London SE114PQ

Flat 2 8 Vine Yard London SE1 1QL
Flat 308 118 Southwark Bridge Road SE1 0BQ
118 Southwark Bridge Road London SE1 0BQ
17 Wilson Grove London se16 4pj
4 Monck House 14 Cole Street SE1 4YH
133 Southwark Bridge Road SE1 0EY
Whitehill House Sawyer St SE10EQ
Maisonette 1 175 Southwark Bridge Road SE1 0ED
37b Trinity St London se1 4ja
Flat 9, 6 Montague Close London SE1 9DF
Flat 21 176 Long Lane SE1 4BS
5 Empire Sq South SE1 4NF
20 Roupell Street London SE1 8SP
Flat 9 Winchester Buildings Copperfield Street SE1 0ER
58 Reedworth Street London SE11 4PQ

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

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

Statutory and non-statutory organisations

Historic England
Environment Agency
London Fire & Emergency Planning Authority
London Underground Limited
Network Rail (Planning)
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Apartment 203 21 Cabanel Place SE11 6BD
Apartment 301 84 Lollard Street SE11 6PX
Apartment 45 85 Ewer Street SE1 0FT
Apartment 6 Bridgegate House 116-118 Borouhg High Street SE1 1LB
Apartment 6 Bridgegate House 116-118 Borouhg High Street SE1 1LB
Bacchus Studios 11 Vine Yard SE1 1QL
Block T Flat 11 Peabody Square SE1 8HS
20 X Received By Email
Capital People 4 King James Court SE1 4DZ
Dodson Street London SE1 7ql
Flat A, 107 Brook Drive SE11 4TU
Flat A 20 Pilgrimage Street Se14ll
Flat 1, Winchester Buildings Copperfield Street
Flat 100 Redman House London SE1 1QW
Flat 11, Building 100, Alaska Buildings 61 Grange Road SE1 3BA
Flat 11 Villiers Court 167 Long Lane SE1 4PN
Flat 13 14 Weller Street SE1 1QU
Flat 13 14 Weller Street SE1 1QU
Flat 13 14 Weller Street SE1 1QU
Flat 13 91 Great Suffolk Street SE1 0BX
Flat 15, 43 Searles Rd London SE1 4YL
Flat 15, 43 Searles Rd London SE1 4YL
Flat 16 1 Trundle Street SE1 1QT
Flat 2, 100 Long Lane Se1 4bw
Flat 2 100 Long Lane Se1 4bw
Flat 2 28 Trinity Street SE1 4FF
Flat 2 8 Vine Yard London SE1 1QL
Flat 20 Brenley House Tabard Garden Estate Tennis Street SE1 1YG
Flat 20a Pilgrimage Street London Se1 4ll
Flat 205 118 Southwark Bridge Road SE1 0BQ
Flat 21 176 Long Lane SE1 4BS
Flat 210 118 Southwark Bridge Road SE1 0BQ
Flat 22 Drake Court SE1 1BH
Flat 23 4 Sanctuary Street SE1 1EA

Flat 3 Mawdley House SE1 8XQ
Flat 3 108 Great Guildford St SE1 0ES
Flat 3 2 Cosser Street SE1 7BU
Flat 3 2 Cosser Street SE1 7BU
Flat 306 118 Southwark Bridge Road SE1 0BQ
Flat 306 118 Southwark Bridge Road SE1 0BQ
Flat 306 118 Southwark Bridge Road SE1 0BQ
Flat 308 118 Southwark Bridge Road SE1 0BQ
Flat 31 Lant House Lant Street SE1 1PJ
Flat 31 9 Falmouth Road SE1 4JY
Flat 35 Harbledown House Manciple St SE14LN
Flat 37 Shere House Great Dover St SE1 4YQ
Flat 37 Shere House Great Dover St SE1 4YQ
Flat 4 Quastel House 43 Long Lane SE1 4AY
Flat 402 Cedar Court 1 Royal Oak Yard SE1 3GA
Flat 43 Pattison House Redcross Way SE1 1EY
Flat 43 Shere House SE1 4YQ
Flat 43 Shere House SE1 4YQ
Flat 5, Block A, Peabody Estate, Southwark Street London SE1 0TW
Flat 5 Lapwing Court Swan St se11be
Flat 5, Zeiss Court 46 Lancaster Street Se1 0fy
Flat 51, 130 Webber Street London SE1 0JN
Flat 55, Prospect House Gaywood Street Se16hf
Flat 6, Block G Peabody Estate SE1 0TH
Flat 6, Block G Peabody Estate SE1 0TH
Flat 6 Block H, Peabody Square Blackfriars Rd SE1 8JJ
Flat 6 14 Weller Street SE1 1qu
Flat 6 14 Weller Street se1 1qu
Flat 6 5b Bear Lane London Se1 0uh
Flat 62 Patrick Court 92 Webber Street SE10GB
Flat 62 Patrick Court 92 Webber Street SE10GB
Flat 63 Arrol House Rockingham Street SE1 6QL
Flat 7 Isaac Way SE1 1ee
Flat 7, Rumford House Bath Terrace SE1 6PW
Flat 7, Rumford House Bath Terrace SE1 6PW
Flat 7, Rumford House Bath Terrace SE1 6PW
Flat 8 Block E Peabody Estate Southwark Street SE1 0TG
Flat 8 Chaloner Court 11 Tennis Street SE11YD
Flat 8, Thorold House London SE1 0EL
Flat 8, 66 Plender St London NW1 0LB
Flat 804 Alaska Building 61 Grange Road SE1 3BG
Flat 9 Pattison House Red Cross Way SE1 1EY
Flat 9 Pattison House Red Cross Way SE1 1EY
Flat 9 Winchester Buildings Copperfield Street SE1 0ER
Flat 9 Winchester Buildings Copperfield Street SE1 0ER
Flat 9, 6 Montague Close London SE1 9DF
Flat 92 130 Webber Street SE1 0JP
Goodwin Close Bermondsey
Honeybridge House Ashurst BN44 3AW
Hopton St London SE1 9LF
Maisonette 1 175 Southwark Bridge Road SE1 0ED
No Address SE1
No Address Or Email
Tamarind Court Gainsford Street SE1 2NE
Tamarind Court 18 Gainsford Street SE1 2NE
Tapley House SE1 2BW
Top Flat 156 Southwark Bridge Road SE1 0DG

Top Flat 156 Southwark Bridge Road se1 0dg
Unit 3 Sigmal House 137 Great Suffolk Street SE1 1PZ
Unit 4 King James Court King James Street SE1 0DH
Whitehill House Sawyer St SE10EQ
1 Winchester Buildings Copperfield Street SE1 0ER
101 Athena Court City Walk SE1 3EN
101 Athena Court City Work SE1 3EN
103 Draper House 20 Elephant & Castle Se1 6SY
108 Great Guildford St London SE1 0ES
11 Braque Building 86 Ewer Street Se1 0ft
11 Villigers Court SE1 4PN
11 Vine Yard SE1 1QL
111 Metro Central Heights 119 Newington Causeway Se16bb
118 Southwark Bridge Road London SE1 0BQ
12 Block I Peabody Square Blackfriars Road SE18JL
12 Brenley House Tabard Garden Estate Se1 1yg
12 Wireworks Court 79 Great Suffolk Street SE1 0BU
12a Trinity Church Square London SE1 4HU
12a Trinity Church Square London SE1 4HU
13 Mitre Rd London
13 Walcot Square London SE11 4UB
13a Peabody Buildings Camberwell Green SE5 7BD
133 Southwark Bridge Road SE1 0EY
135 Southwark Bridge Road London SE1 0EY
14 Berwick Court 10 Suran Street SE1 1BG
14 Berwick Court 10 Swan Street SE1 1BG
14 Berwick Court 10 Swan Street SE1 1BG
14 Berwick Court 10 Swan Street SE1 1BG
14 Betsham House Newcomen Street SE1 1YU
14 Block F Peabody Estate Southwark St London Se10tq
14 Weller St London SE11QU
146 Abbey Street SE1 3NR
149 Blackfriars Road 149 Blackfriars Road Se1 8ef
15 Bittern House Bittern Street SE1 1PH
151 Empire Square South London Se1 4NG
152 Brook Drive London SE11 4te
16 Northfleet House London
16 Northfleet House London
169 The Circle Queen Elizabeth Street SE1 2JL
17 Martin House Falmouth Road Se1 6qp
17 Martin House Falmouth Road Se1 6qp
17 Pepper Street London SE1 0EW
17 Tyres Gate London SE1 3JG
17 Tyres Gate London SE1 3JG
17 Wilson Grove London se16 4pj
173b New Kent Road London SE1 4AG
18 Beaque Building 86 Ewer Street SE1 0FT
18 Binnie House Bath Terrace se16qg
18 Blake House Hercules Road SE2 7DX
18 Stephenson House London SE1 6PP
18a Falmouth Road London SE1 4JQ
19 Copperfield Street London SE1 0EP
19 Pattison House London SE1 1EY
19 Rochester House London SE1 4CP
2 Peppler Mews London SE5 0HX
2b Redcross Way London SE1 9HR
20 Isaac Way London SE11EE

20 Roupell Street London SE1 8SP
20 Roupell Street London SE1 8SP
21 Bentham House 7 Falmouth Road SE1 4JY
21 Betshamhouse London Se1 1yu
21 Elim Estate Weston Street SE1 4BY
21 5b Bear Lane se1 0uh
21,5b Bear Lane London Se1 0uh
22 Messiah Square London SE1 UJB
22 Portland Court 50 Trinity St Se1 4jz
23 Brenley House London Se1 1yg
23 Burlington House Province Drive SE16 7BZ
23 Stopher House 90 Webber Street SE1 0SE
23 The Paddock Gerrards Cross SL9 0JJ
23lant Houes Lant Street Se11pj
25 Merrick Square London SE14jb
25 Scovell Credcent London SE1 1PS
25 Swan Street London SE1 1BY
259 Helen Gladstone House Blackfriars Road SE1 0QB
26 Arch Street Flat 26 SE1 6AT
26 Dawkins Court Harper Road SE1 6AY
26 Friars Close Bear Lane SE1 0UJ
27 Sudrey Street Borough SE1 1PF
28 Browning Street London SE17 1LU
28 Browning Street London SE17 1LU
28 Sudney Street London SE1 1PF
28 Sudrey Street SE1 1PF
29 Barwash House SE1 9RU
29 Portland Court 50 Trinity St Se1 4jz
3 Bartholomew St London SE1 4AJ
3 Bartholomew Street London SE1 4AJ
3 Cranfield Row London SE1 7QN
3 Cranfield Row London SE1 7QN
3 Gardiner House Borough Road SE1 0AG
3 Mawdley House Webber Row Se1 8XQ
30 Simla House Kipling Estate SE1 3RL
30 Simld House SE1
30 Simld House SE1
31halley Gardens London SE13 5PA
33 Ellington House Harper Road SE1 6RP
34 Northfleet House London SE11YX
34 Northfleet House London SE11YX
35 Lakanal Sceqeix Gardens SE5 7DW
37 Lant SE1 1PJ
37 Law Street London SE1 4DZ
37b Trinity St London se1 4ja
4 Barkham Terrace London SE1 7PS
4 Barkham Terrace London SE1 7PS
4 Barkham Terrace London Se17ps
4 Monck House 14 Cole Street SE1 4YH
4 Shere House Great Dover Street Se14yq
40 Collinson Court Great Suffolk Street SE1 1PA
40 Date Street London SE17 2HQ
402 Cedar Court London SE1 3GA
43 Pattison House Redcross Way SE1 1EY
44 Prospect House Gayond Street SE1 6HF
48 Collinson Court Great Suffolk Street SE1 1PA
48 Delima Street SE1 4QQ

48 Patric Court London SE1 0GB
48 Patvic Court London SE1 0GB
49 Sumner Buildings Sumner Street SE1 9JX
5 Aird House Rockingham Street Se1 6qh
5 Empire Sq South SE1 4NF
50 Guinness Court SE1 3SX
50 Pakeman House Polock Street SE1
502 Henderson Apartments London SE17 1FJ
55 Harper Road London SE1 6AP
55 Summer Building Summer Street SE1
56 Pennethorne Road London SE15 5TQ
57 Prospect House Gaywood Street se1 6hf
57a Lant Street London SE1 1QN
58 Bermondsey Street England SE1 3UD
58 Reedworth Street London SE11 4PQ
58 Reedworth Street London SE114PQ
58 Reedworth Street London SE114PQ
59 Falmouth Road London SE1 4JN
6 Bridgegate House London SE1 1LB
6 Brockham Street London SE1 4HX
6 Sullivan Road London SE11 4UH
60, Wendover Thurlow Street SE17 2UG
61 Cornwall Road Southbank SE1 9PN
61a Brook Drive London S3E11 4T
62 Patrick Court 92 Webber Street Se1 0Gb
62 Patrick Court 92 Webber Street Se1 0Gb
62 Reverdy Road London SE1 5QD
62 Sumner Buildings Southwark se1 9jy
62 Sumner Buildings Sumner Street SE1 9JY
63 Stephenson House Bath Terrace SE1 6pr
7 Bartholomew Street London SE1 4AJ
7 Bartholomew Street London SE1 4AJ
7 Brooke Wood House London SE1
7 Brookwood House London SE1
7 Copperfield Street London SE1 0EP
7 Copperfield Street London SE1 0EP
7 Dauncey House Webber Row SE1 8QS
7 Kite House 286 Lynton Road SE1 5ZS
7 Orient Street London SE11 4SR
72 Patric Court 92 Webber Street
73 Cobourg Road London SE5 0HU
74 Southwark Bridge Road London Se1 0as
76 Marlborough Close London SE173AP
77 Symingronm House London SE1 4AB
8 Thorold House Pepper Street SE10EL
82 Redman House Lant Street SE1 1QW
83 Elim Estate Weston Street SE1 4DD
84 Southwark Bridge Road London SE10EX
85 King William Street London EC4N 7BL
85-91 Mint Strret Flat 91 SE1 1QX
85-91 Mint Strret Flat 91 SE1 1QX
87 Wiclesteed House London SE1 6RH
9 Copperfield Street London SE1 0EP
9 Sudrey Street Southwark SE1 1PF
9 Sudrey Street Southwark SE1 1PF
9 Winchester Buildings Copperfield Street SE1 0ER
9 Winchester Buildings Copperfield Street SE1 0ER

9 Winchester Buildings Copperfield Street SE1 0ER
92 Stamford Street London SE1 9NH
93 Great Suffolk Street London SE1 0BX
95 Juniper Crescent NW1 8hq
96, Redman House, Lant Street, London SE1 1QW