

<b>Item No.</b> 5.2	<b>Classification:</b> Open	<b>Date:</b> 7 February 2018	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Council's own development Application 17/AP/2908 for: Council's Own Development - Reg. 3  <b>Address:</b> BEDE CENTRE, ABBEYFIELD ROAD, SE16 2BS  <b>Proposal:</b> Demolition of existing Bede Centre (D1 use) and construction of a part-9 storey and part-6 storey block providing 87 affordable homes with associated cycle stores, refuse store, car parking, and landscaping and highway improvements along Abbeyfield Road and adjacent to Thaxted Court.		
<b>Ward(s) or groups affected:</b>	Rotherhithe		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 08/08/2017		<b>Application Expiry Date</b> 07/11/2017	
<b>Earliest Decision Date</b> 13/09/2017			

## RECOMMENDATION

1. a) That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement and receipt of the stage 2 comments from the Mayor of London.
- b) That in the event that the requirements of a) are not met by 31 May 2018, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 136.

## BACKGROUND INFORMATION

2. This application is one of three planning applications in the Abbeyfield Estate at Maydew House (ref. 17/AP/0527), Bede Centre (17/AP/2908) and Damory House and Thaxted Court (ref. 17/AP/2562). These three applications submitted by the council seek to extend Maydew House, Damory House and Thaxted Court to provide additional affordable homes, to redevelop the Bede Centre for affordable housing, and relocate the community centre to Maydew House. The current applications are to be presented at the same Committee as they would redevelop a significant part of the Abbeyfield Estate.
3. This application forms part of a wider estate regeneration programme to be developed through a masterplan in four phases:
  - Phase 1 – strip out of Maydew House (already completed)
  - Phase 2 – Damory House and Thaxted Court (17/AP/2562)
  - Phase 3 – Maydew House, including replacement community facility (17/AP/0527)
  - Phase 4 – Bede Centre site redevelopment (this application).

## Site location and description

4. The 0.51 hectare application site comprises a two-storey building used by the Bede Youth Project and the Bede Learning Disabilities Project (both Class D1 uses). There are car parking areas and garages on the ground floor, and an open podium area at the first floor level. The site also contains a raised grassed area, hard surfacing and parking spaces in front of Thaxted Court and the Abbeyfield Road highway, pavements and street trees. The application site is within the Abbeyfield Estate which was constructed in the 1960s. The photographs below show the Bede Centre from the front, and from Southwark Park.



5. Southwark Park lies to the north-east of the application site. It is a registered park and garden (grade II listed), a Site of Importance for Nature Conservation (grade 2) and is Metropolitan Open Land.
6. Maydew House (26 storeys high) and four-storey Damory House are to the north-west of the site, and the four-storey blocks of flats and maisonettes in Thaxted Court to the south-east. On the southern side of Abbeyfield Road are the two-storey houses of Mossington Gardens, flats in the four-storey Anthony House and flats in the seven-storey Bradley House to the south-west.
7. The site is within flood zone 3, the urban density zone, and the air quality management area.
8. Dilston Grove (the former Clare College mission church) is the nearest listed building

sited 30m to the east of the closest part of the application site, on the park boundary. It is a grade II listed, built in the early 1900s and is one of the earliest reinforced concrete churches in London.

9. The site has a PTAL rating of 4. South Bermondsey train station is 400m to the south, Surrey Quays station 550m to the north-east and Bermondsey tube station 800m to the north-west. Bus services run along Rotherhithe New Road and Southwark Park Road.

### **Details of proposal**

10. This application proposes the redevelopment of the Bede Centre site, with the demolition of the Bede Centre, garages, ramp and podium, and the erection of a building containing 87 residential units. All of the units would be affordable housing; 57 of the units for social rent and 30 as intermediate tenure.
11. The block would be served by two lift and stair cores, with cycle and refuse stores in the ground floor. An undercroft in the south-west corner would provide an access into the development from the new public square next to Maydew House. A central courtyard 20m wide would extend eastwards up to Thaxted Court, and proposes new surfacing, trees, planting and play features to provide landscape improvements for both blocks. Biodiverse roofs and PV panels are proposed.



12. The proposed building is a U shaped block of six-storeys and nine-storeys to provide 26 maisonettes (three- and four-bedroom) and 61 flats (one- and two-bedroom) arranged around a central courtyard. The six-storey northern and southern “wings” of the building would provide three layers of maisonettes, and the western central part would be nine-storeys containing the flats.



13. The elevations would be in pale brickwork with decorative bonding in parts, set on a pre-cast concrete plinth. Other details include recessed balconies, with metal balustrades, and tiled entrances.
14. The top floor would be set back from the north, west and south elevations to provide roof terraces to the flats, and would be finished with precast concrete panels and metal cladding.
15. Each unit would have a private amenity space of at least 5sqm. Nine two-bedroom flats are proposed to be wheelchair units. Five wheelchair parking spaces are proposed in the site at the eastern end of the proposed building, and a further five wheelchair parking spaces on the estate road (which is not public highway) at the eastern end of Abbeyfield Road. The estate road would be repaved.
16. Parts of the application material show indicative highway works along Abbeyfield Road in front of the Bede Centre and Maydew House to narrow the road, remove on-street parking bays, widen the pavement, and add tree planting. Such works to the public highway would require the agreement of the Highways Team and changes to the traffic management order and are not proposed as part of the planning application drawings for approval.
17. This application is related to the Maydew House application ref. 17/AP/0527 (for the renovation of the existing 144 units and erection of a five-storey extension to provide an additional 24 units) in particular as the proposed works to the ground floor of Maydew House would provide a new community facility to replace the Bede Centre. The Bede Centre redevelopment would also provide affordable housing to off-set that lost in the Maydew House scheme, where up to 32 of the existing affordable flats are to be sold as private market.
18. Also relevant is the current application ref. 17/AP/2562 for refurbishment and extensions to Damory House and Thaxted Court as Thaxted Court is immediately adjacent to the red line site boundary.

### **Amendments**

19. Amended plans were received in response to the consultation comments. These included the following changes:
  - Removing an originally proposed ground floor flat, reducing the number of proposed units from 88 to 87.
  - Revising the tenure split between social rent and intermediate to increase the

- proportion of intermediate units.
- The highway works and parking along Abbeyfield Road were amended to remove the angled, echelon parking bays alongside the proposed building, leaving the public highway and on-street parking bays as they are currently.
- Amend the division of roof terrace space between the flats on the top floor.
- An addendum to the flood risk assessment, updated transport assessment, ecology survey, and arboricultural report were also provided during the course of the application.

### Planning history

20.

<p>14/EQ/0261 Application type: Pre-Application Enquiry (ENQ)          Hybrid planning application comprising: Refurbishment, alterations and extension of existing building to provide: 144 renovated apartments (first 24 floors). Together with 5 additional floors to provide: 16 new apartments, relocation of existing community uses in Bede Centre into ground &amp; first floor of refurbished building including removal of existing garage &amp; parking deck and provision of extension to provide new sports hall and further community (full application). Demolition of existing Bede Centre and erection of new building for residential purposes to provide solely affordable housing (outline application), associated parking &amp; landscaping          Decision date 04/03/2016 Decision: Pre-application enquiry closed (EQC)</p>
<p>16/AP/1361 Application type: Regulation 3 (Council's own)          Construction of a new sub-station adjacent to the North West corner of Thaxted Court; infill the open ended North West corner of Thaxted Court to house a Heat exchanger sub-station; infill 2No. ground floor garages to Damory House to contain a heat exchanger sub-station.          Decision date 22/6/17 Decision: Grant (GRA)</p>
<p>16/AP/5001 Application type: Lawful development certificate          Certificate of Lawfulness (Proposed) for: the removal of one tree located on the raised grass bed to the front of Thaxted Court.          Decision date 01/02/2017 Decision Grant (GRA)</p>

### Planning history of adjoining sites

#### Damory House, Maydew House and Thaxted Court

21. 16/AP/1332 Application type: Full Planning Permission  
 Removal of raised podium section adjacent to Damory House, with works to include the demolition of garages; Removal of raised podium section adjacent to Thaxted Court; Removal of the retaining walls to the raised grass bed to the front of Thaxted Court; Removal of the raised grass bed, spoil, x4 trees and x2 saplings to the front of Maydew House; Re-landscaping of affected areas to include replacement tree planting.  
 Decision date: Granted 4/7/16

#### Maydew House

22. 17/AP/0527 Application type: Full Planning Permission  
 Refurbishment of the existing 144 residential units and erection of a 5 storey extension providing 24 additional residential units (Class C3). Landscape improvements to the front of Maydew House, with a new residential entrance at ground floor and residents amenities at first floor together with a new community facility (Class D1) at ground floor. New pedestrian route and gates into Southwark Park and other associated works incidental to the development.

Decision date: Item 6.1 on this committee agenda

### Damory House and Thaxted Court

23. 17/AP/2562 Application type: Full Planning Permission  
Redevelopment of Thaxted Court, entailing;
- Conversion of the existing ground floor undercroft/garaging area within the northwest wing into x2 self-contained dwellings;
  - Construction of a two-storey extension to the roof (i.e. at fourth and fifth floor level) of both wings of the building to facilitate the delivery of x12 self-contained dwellings;
  - Alterations to the existing building, including: the installation of a new glazed facade; re-cladding of existing elevations; the creation of a new covered entrance at ground floor level; and the provision of dedicated cycle and refuse storage spaces;
  - Delivery of new public realm, hard and soft landscaping, and associated works.

Redevelopment of Damory House, entailing;

- Construction of a two-storey extension to the roof (i.e. at fourth and fifth floor level) across the full length of the building to facilitate the delivery of x14 self-contained dwellings;
- Alterations to the existing building, including: the installation of a new glazed facade; re-cladding of existing elevations; the creation of a new covered entrance at ground floor level; and the provision of dedicated cycle and refuse storage spaces;
- Delivery of new public realm, hard and soft landscaping, and associated works.

Decision date: Item 6.3 on this committee agenda

### **KEY ISSUES FOR CONSIDERATION**

#### **Summary of main issues**

24. The main issues to be considered in respect of this application are:
- a) Principle of demolition and the proposed development in terms of conformity with land use policies
  - b) Environmental Impact Assessment
  - c) Design (including layout, height, massing and landscaping)
  - d) Impact on heritage assets
  - e) Affordable housing
  - f) Housing mix and quality
  - g) Density
  - h) Impact of on the amenity of occupiers of neighbouring properties
  - i) Transportation and highways
  - j) Trees and ecology
  - k) Sustainability (including energy, flood risk, contamination, air quality and archaeological matters)
  - l) Planning obligations and Community Infrastructure Levy (CIL)

#### **Planning policy**

25. The statutory developments plans for the borough comprise the London Plan (2016), Southwark Core Strategy (2011), and saved policies from the Southwark Plan (2007). The National Planning Policy Framework (2012) is a material consideration.

National Planning Policy Framework (the Framework)

26.

Section 4: Promoting sustainable transport  
Section 6: Delivering a wide choice of high quality homes  
Section 7: Requiring good design  
Section 8: Promoting healthy communities  
Section 10: Meeting the challenge of climate change, flooding and coastal change  
Section 11: Conserving and enhancing the natural environment  
Section 12: Conserving and enhancing the historic environment.

The London Plan 2016

27.

Policy 1.1 Delivering the strategic vision and objective of London  
Policy 2.9 Inner London  
Policy 3.1 Equal chances for all  
Policy 3.2 Improving health and assessing health opportunities for all  
Policy 3.3 Increasing housing supply  
Policy 3.4 Optimising housing potential  
Policy 3.5 Quality and design of housing developments  
Policy 3.6 Children and young people's play and informal recreation facilities  
Policy 3.8 Housing choice  
Policy 3.9 Mixed and balanced communities  
Policy 3.10 Definition of affordable housing  
Policy 3.11 Affordable housing targets  
Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes  
Policy 3.13 Affordable housing thresholds  
Policy 3.16 Protection and enhancement of social infrastructure  
Policy 5.1 Climate change mitigation  
Policy 5.2 Minimising carbon dioxide emissions  
Policy 5.3 Sustainable design and construction  
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 5.20 Contaminated land  
Policy 6.3 Assessing effects of development on transport capacity  
Policy 6.9 Cycling  
Policy 6.10 Walking  
Policy 6.13 Parking  
Policy 7.1 Lifetime neighbourhoods  
Policy 7.2 An inclusive environment  
Policy 7.3 Designing out crime  
Policy 7.4 Local character  
Policy 7.5 Public realm  
Policy 7.6 Architecture  
Policy 7.8 Heritage assets and archaeology  
Policy 7.14 Improving air quality  
Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes  
Policy 7.19 Biodiversity and access to nature

Policy 7.21 Trees and woodlands  
Policy 8.2 Planning obligations  
Policy 8.3 Community Infrastructure Levy.

Greater London Authority Supplementary Guidance

28.

Affordable Housing and Viability (August 2017)  
Housing SPG (March 2016)  
Play and Informal Recreation SPG (September 2012)  
Sustainable Design and Construction SPG (April 2014)

Core Strategy 2011

29.

Strategic policy 1 – Sustainable development  
Strategic policy 2 – Sustainable transport  
Strategic policy 4 – Places for learning, enjoyment and healthy lifestyles  
Strategic policy 5 – Providing new homes  
Strategic policy 6 – Homes for people on different incomes  
Strategic policy 7 – Family homes  
Strategic policy 11 – Open spaces and wildlife  
Strategic policy 12 – Design and conservation  
Strategic policy 13 – High environmental standards  
Strategic policy 14 – Implementation and delivery.

Southwark Plan 2007 (July) - saved policies

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

Policy 2.1 Enhancement of Community Facilities  
Policy 2.5 Planning Obligations  
Policy 3.1 Environmental Effects  
Policy 3.2 Protection of Amenity  
Policy 3.3 Sustainability Assessment  
Policy 3.4 Energy Efficiency  
Policy 3.6 Air Quality  
Policy 3.7 Waste Reduction  
Policy 3.9 Water  
Policy 3.11 Efficient Use of Land  
Policy 3.12 Quality in Design  
Policy 3.13 Urban Design  
Policy 3.14 Designing Out Crime  
Policy 3.15 Conservation of the Historic Environment  
Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites  
Policy 3.28 Biodiversity  
Policy 4.2 Quality of residential accommodation  
Policy 4.3 Mix of Dwellings  
Policy 4.4 Affordable Housing  
Policy 4.5 Wheelchair Affordable Housing  
Policy 5.1 Locating Developments  
Policy 5.2 Transport Impacts

Policy 5.3 Walking and Cycling  
Policy 5.6 Car Parking  
Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired.

Southwark Supplementary Planning Documents

31. 2015 Technical Update to the Council's Residential Design Standards SPD (2011)  
Affordable Housing SPD (2008)  
Draft Affordable Housing SPD (2011)  
Design and Access Statements SPD (2007)  
Development Viability SPD (2016)  
Section 106 Planning Obligations and CIL SPD (2015)  
Sustainability Assessment SPD (2009)  
Sustainable Design and Construction SPD (2009)  
Sustainable Transport SPD (2010).

**Principle of demolition and the proposed development in terms of conformity with land use policies**

32. The application proposes to change the use of the site from Class D1 community use to residential (Class C3) with the demolition of the Bede Centre and construction of the proposed maisonettes and flats. The policies relating to community use and residential are summarised below.
33. London Plan policy 3.16 "Protection and enhancement of social infrastructure" states that additional and enhanced social infrastructure provision is required to meet the needs of London's growing and diverse population, and proposals leading to a loss of social infrastructure should be resisted.
34. At the borough level, Core Strategy policy 4 "Places for learning, enjoyment and healthy lifestyles" seeks to facilitate a network of community facilities that meet the needs of local communities and encourages flexible community spaces. Policy 2.1 "Enhancement of community facilities" of the Southwark Plan seek to retain Class D community facilities and educational establishments, unless it can be demonstrated that it is surplus to requirement or that similar or enhanced provision within the catchment area is secured.
35. Policies 3.3, 3.4 and 3.11 of the London Plan, 5 and 6 Core Strategy, and 3.11 and 4.2 Southwark Plan seek to provide new housing, affordable housing, and make efficient use of land.

*Loss of community use*

36. The demolition of the Bede Centre proposed by this application would result in a loss of 600sqm of Class D1 floorspace and the community uses of the existing two storey building. A larger replacement community facility is to be provided in the base of Maydew House at ground and part of the first floor levels, immediately adjacent to the application site to allow the Bede Centre to relocate. This replacement provision accords with policies in the London Plan, Core Strategy and Southwark Plan. The new community centre would provide a hall, social room, café, and ancillary offices and reception rooms. A youth club room, activity room with its own offices and toilet facilities would be provided with a separate access, although it can link through to the community centre by an internal door. Both would be accessed from the improved public square. These facilities are considered in more detail in the Maydew House application, but are considered to be suitable replacements for the existing, dated facilities in the Bede Centre, and represent a redistribution of the existing uses within the Abbeyfield Estate.

37. The phasing of the construction works means that the Maydew House refurbishment and extension work (including providing a community centre) would happen first, and once the Bede Centre has moved to its new location, the existing Bede Centre building would be demolished, to allow the construction of the residential block on the Bede Centre site. The landscaping around the two sites would provide a new public square and route into Southwark Park, as well as improved highway and streetscape.

#### *Housing provision*

38. The application proposes the redevelopment of a brownfield site within a residential area to provide housing, contributing towards the borough's housing targets and particularly the affordable housing targets as 100% of the units proposed would be affordable housing.
39. With an obligation in the unilateral undertaking to ensure the phasing of the work provides the replacement community facility in Maydew House ready for occupation prior to any demolition of the Bede Centre, the proposed residential development of this site accords with policy in terms of the principle of the demolition of the existing building and use, and the redevelopment of the site for housing.

#### **Environmental impact assessment**

40. The scale of development does not reach the minimum thresholds established in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that would trigger the need for an environmental impact assessment. The proposal's location and nature do not give rise to significant environmental impacts in this urban setting, nor does the cumulative development with the proposed Maydew House, Damory House and Thaxted Court extensions exceed the indicative threshold for an urban development project.

#### **Design**

41. Core Strategy policy 12 "Design and conservation" requires development to achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in. Saved policies 3.12 "Quality in design" and 3.13 "Urban design" of the Southwark Plan seek a high quality of architectural and urban design, and policy 3.14 "Designing out crime" states that development should be designed to improve community safety and crime prevention.

#### *Site context*

42. The proposal is for the comprehensive redevelopment of the current Bede Centre site which located at the heart of the Abbeyfield Estate and sites between the 26-storey high Maydew House and Thaxted Court. The estate is arranged on a Cartesian grid of open courts and elevated walkways which are typical of the 1960s and 70s. The proposal is linked to the re-development of Maydew House which provides, at its base, the Bede Centre community facilities that would be displaced as part of this proposal.

#### *Demolition*

43. There is no design objection to the demolition of the Bede Centre, garages and first floor podium.

#### *Height, scale, massing and arrangement*

44. The proposal is arranged in a U-shape and designed to mirror the L-shaped arrangement of Thaxted Court. In this way the arrangement allows the existing and the proposed new building to work together to define a large rectangular urban block with a court at its centre, which is intended to become a shared communal amenity for both buildings. The proposed arrangement is logical and sound, and the U-shaped arrangement completes the urban block and would give the site a clear urban form.
45. Further, the arrangement is designed to form part of a new public square proposed at the foot of the redeveloped Maydew House on Abbeyfield Road. The intention is that this new public space becomes the main entrance to Maydew House homes, the relocated Bede Centre community facilities, and the proposed block. The proposed building would be set well away from Maydew House and offers a clear view of Southwark Park beyond with a new access to the Park (proposed in the Maydew House application).
46. The height and massing follow naturally from the urban form. The proposed height is set at four- to six-storeys on Abbeyfield Road and on the edge of the Southwark Park. On the north-western side of the site and facing onto the new public square, the height rises to eight-storeys with a set-back ninth storey. The building would be further articulated with a two-storey high cut-out near to the Abbeyfield Road frontage which distinguishes the two parts of the block, and gives added sense of verticality to this north-western elevation. The height rises naturally from the prevailing four-storey height of the Thaxted Court (now proposed to be extended by two storeys to be six-storeys) and would continue the proposed heights along the edge of the Park. Nearest to Maydew House, the proposed nine-storey element block rises and mediates appropriately between the lower scale of the estate and the tower.
47. The site is outside the LVMF Blackheath Point to St Paul's view and assessment areas, so the proposal would not affect any strategic view.

*Architectural design - fabric, function and composition*

48. The proposal is designed as a brick-clad residential block in the modern "warehouse aesthetic" typical of Bermondsey. The fabric is expressed in the architectural design with deep-set windows, balconies and colonnades which would give a strong expression to the material on the outer faces of the U-shaped building. Balconies are in-set and the main entrance is via double-height colonnaded space at the north-west corner of the block, facing onto the proposed new public square. On the inner face of the building looking onto the inner courtyard, the design is lighter with the brick expressed as a grid with metal cladding in-fill. This is a natural expression for the deck-accessed maisonettes on the two wings and gives the courtyard an informal communal feel and would allow the residents to overlook this landscape court at the centre of the development.
49. The residential accommodation provided would be high quality and follows the architectural expression of the development. On the two wings of the U-shaped block the accommodation is in the form of stacked maisonettes offering high quality three- and four-bedroom family accommodation complete with adequate private amenity space. The main block includes all the predominantly flatted accommodation and includes the wheelchair accessible housing.
50. In terms of the composition, the proposal presents a well-designed and highly articulated block with a clearly defined base, middle, and top. At the base the building is defined by a close-set colonnade which helps to soften it as it reaches the ground. The colonnade is made grander at the main entrance where it is double-height and includes a bold-coloured inner face (proposed to be finished in a glazed brick or

ceramic tile). At the top of the main block the building is set back, and the facade becomes a colonnade or loggia which gives the tallest element an appropriate top or “crown”.

51. Officers are satisfied that the proposal is of a high quality design, with a well defined urban form and an enduring architectural expression. The delivery of this high quality design will rely to a large degree on the quality of architectural detailing, the choice of materials and the quality of the landscape. Conditions regarding samples of the materials and detailed drawings are proposed to secure the delivery of the quality embedded in the application.

### **Impact on heritage assets**

52. The proposed building is near to the grade II listed former Dilston Grove, which is 30m to the east of the site at the closest point, and also adjoins the historic Southwark Park (a grade II registered park). In considering the impact of a proposal on a heritage asset such as a listed building, the local planning authority must have regard to planning legislation in its determination of a planning application. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses. In this context, "preserving", means doing no harm. The council's conservation policies echo the requirements of the NPPF and require all development to conserve or enhance the setting of heritage assets.
53. The National Planning Policy Framework states at paragraph 131 that in determining a planning application, the local planning authority should take account of:
  - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
54. Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Similarly saved policy 3.15 “Conservation of the historic environment” requires development to preserve or enhance the special interest or historic character or appearance of buildings and areas of historical or architectural significance, and this is repeated in Core Strategy policy 12. Saved policy 3.18 “Setting of listed buildings, conservation areas and world heritage sites” states that permission will not be granted for developments that would not preserve or enhance the setting of a listed building or a conservation area.
55. Southwark Park has a variety of building heights and styles surrounding its borders in all directions, with the Abbeyfield Estate forming the boundary along this south-western part of the Park. The Bede Centre does not contribute positively to the setting of this section of the Park.
56. In its relationship with the grade II registered Southwark Park, the proposal seeks to enhance the setting of the park by reinforcing the edge in the same way that other similar-scaled buildings enclose the park without dominating it. This part of the park benefits from a number of substantial trees which form a dense screen to the edge of the park. The only feature that breaks this edge is the substantial form of Maydew

House. In this sensitive historic context, the NPPF and the council's policies require all developments to avoid causing harm to the heritage asset including its setting. The proposal is considered to conserve and reinforce the setting of the park, and in the opinion of officers does not harm the heritage asset or its setting because it is not a tall building and adheres to the prevailing height of existing buildings on this side of the Park. There are also benefits of the development, with its high quality design, the improved urban form, landscape and permeability across the estate, and the provision of affordable housing. The replacement shrub planting within the Park along the boundary with Thaxted Court, Bede Centre, Maydew House and Damory House, and the additional tree planting along the new access link to the park pathway would be secured through the unilateral agreement. The detail and maintenance will require the agreement of the Parks Team.

57. The setting of the western side of Dilston Grove when viewed from Southwark Park is dominated by the mature trees within the park, with glimpses of Thaxted Court when the trees are in leaf, the first floor of Bede House, and the Maydew House tower being prominent but in wider views being set further from the listed building.
58. The closest parts of the application site to Dilston Grove are the area of landscaping in front of Thaxted Court (where landscape improvements are proposed) and the end of Abbeyfield Road where the estate road would be resurfaced; these ground level works would not affect the setting of the listed building.
59. The six-storey south-eastern wing of the block would be set 50m from the listed building, although this would be partly screened in views from Southwark Park by the four-storey Thaxted Court. The six-storey and nine-storey northern parts of the proposed block would be 58m away, and visible from the northern side of Southwark Park alongside Dilston Grove, where it would be viewed alongside Maydew House and Thaxted Court. In summer months the large plane trees would provide some screening of the building, as they do at the moment.
60. Due to the distance of the proposed block from the listed building, the current appearance of the Bede Centre, and the appearance of the proposed building as part of the setting of Dilston Grove, the proposal is considered to at least preserve the setting of this listed building.
61. The proposed building is considered to preserve the setting of the listed building and Southwark Park, and would accord with section 66 and the NPPF.

### **Affordable housing**

62. London Plan policy 3.8 states that the provision of affordable family housing should be a strategic priority for borough policies, and policy 3.9 promotes mixed and balanced communities (by tenure and household income). Further details on the definition of affordable housing, targets, and requiring the maximum reasonable amount of affordable housing on major schemes are included in policies 3.10, 3.11, 3.12, and 3.13 of the London Plan. Core Strategy policy 6 "Homes for people on different incomes" requires as much affordable housing on developments of 10 or more units as is financially viable, and at least 35%. Saved policy 4.4 "Affordable housing" of the Southwark Plan seeks at least 35% of all new housing as affordable within the urban density zone.
63. The application proposes all of the 87 units would be affordable homes, with 57 as social rent and 30 as intermediate tenure. This 100% provision is far in excess of the 35% minimum provision sought by saved policy 4.4 and Core Strategy policy 6. The provision of a large number of affordable homes is a key benefit of the proposal. The table below shows the proposed unit mix, and habitable rooms (including where a

room is larger than 27.5sqm, it is counted as two habitable rooms).

<b>Tenure</b>	<b>Social rent habitable rooms (units)</b>	<b>Intermediate rent habitable rooms (units)</b>	<b>Total</b>
1 bedroom	30 (15)	30 (15)	60 (30)
2 bedroom	49 (23)	25 (8)	103 (31)
3 bedroom	71 (16)	30 (7)	101 (23)
4 bedroom	16 (3)	0 (0)	16 (3)
<b>Total habitable rooms (units)</b>	<b>195 (57)</b>	<b>85 (30)</b>	<b>280 (87)</b>

64. The viability summary provided shows that the scheme would be viable with the 100% affordable housing proposed only because of the £25.7m of public funding to be used for this project. The public funding comprises £6.07m of Right to Buy receipts and £19.66m of section 106 contributions for off-site affordable housing from other developments. This Bede Centre scheme (and the Thaxted Court and Damory House application) proposes more social rent unit (above the 35% policy requirement) in order to re-provide for those lost with the Maydew House proposal, and uses Right to Buy receipts from the sale of other council housing. The use of £19.66m of off-site affordable housing contributions from other developments means that the affordable housing requirements from other schemes (where an off-site payment has been accepted instead of on-site provision) is being provided here.
65. The split of intermediate and social rent tenure is 70%:30% by habitable room in this application is in line with that sought by saved policy 4.4.
66. The high proportion of affordable housing within the scheme is welcomed, although part of the provision is necessary to re-provide the affordable units currently in Maydew House that would be changed to private market units as part of the proposal in application ref. 17/AP/0527. That application results in a loss of up to 32 social rent units. The cumulative figures across the three applications are set out below in terms of habitable rooms and units.
67. In the context of the wider Abbeyfield Estate regeneration, set out below is:
- Table 1: the number of habitable rooms and units across the site as existing;
  - Table 2: the number of habitable rooms and units across the site as proposed, including the existing units to be retained.
68. As existing across all three sites:

Table 1

<b>Existing tenure</b>	<b>Social rent habitable rooms (units)</b>	<b>Intermediate rent habitable rooms (units)</b>	<b>Private habitable rooms (units)</b>	<b>Total</b>
Maydew House existing	432 (144)	0 (0)	0 (0)	432 (144)

Bede Centre existing	0 (0)	0 (0)	0 (0)	0 (0)
Thaxted Court and Damory House existing	80 (38)	0 (0)	76 (21)	156 (59)
Total habitable rooms (units)	512 (182)	0 (0)	76 (21)	588 (203)
<b>Percentage of total habitable rooms (units) across all 3 schemes</b>	<b>87.1% (89.7%)</b>	<b>0 (0) (0%)</b>	<b>12.9% (10.3%)</b>	<b>100%</b>

Notes: as defined in the glossary of the Affordable Housing SPD, a habitable room is a room the main purpose of which is for sleeping, living or dining and any room with a window that could be used to sleep in regardless of what its intended use is. This excludes toilets, bathrooms, kitchens with an overall floor area of less than 11 square metres, landings, halls and lobbies.

69. As proposed across all three sites:

Table 2

<b>Proposed tenure</b>	<b>Social rent habitable rooms (units)</b>	<b>Intermediate rent habitable rooms (units)</b>	<b>Private habitable rooms (units)</b>	<b>Total</b>
Maydew House proposed	336 (112)	0 (0)	156 (56)	492 (168)
Bede Centre proposed	195 (57)	85 (30)	0 (0)	280 (87)
Thaxted Court and Damory House proposed	171 (66)	0 (0)	76 (21)	247 (87)
Total habitable rooms (units)	702 (235)	85 (30)	232 (77)	1019 (342)
<b>Percentage of total habitable rooms (units) across all 3 schemes</b>	<b>68.9% (68.7%)</b>	<b>8.3% (8.8%)</b>	<b>22.8% (22.5%)</b>	<b>100%</b>

70. Between the three applications, there would be a net increase of 83 affordable units, of which 53 (69.1% by habitable room) would be social rent and 30 intermediate (30.9% by habitable room), and improved quality of the existing units and their outdoor amenity spaces and playspace.

71. The Bede Centre proposal itself would provide a significant number of affordable units (a total of 87) and as part of the programme of works in the Abbeyfield Estate would

assist in improving this estate and creating a mixed community. The affordable housing provision would accord with policies in the London Plan, Core Strategy policy 6, and saved policy 4.4 of the Southwark Plan.

### Housing quality and mix

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

#### *Mix and unit size*

73. The proposal includes the following unit mix:

Unit size	Number of units	Percentage
One bedroom	30	34.5%
Two bedroom	31	35.6%
Three bedroom	23	26.4%
Four bedroom	3	3.5%
<b>Total</b>	<b>87</b>	<b>100%</b>

74. The proposed mix therefore meets the minimum 60% two-bedrooms or larger requirement (with 65.5% proposed), and significantly exceeds the minimum 20% three-bedrooms or larger policy requirement of the Core Strategy (at 29.5%).
75. Each unit would meet or exceed the relevant minimum internal size standard. Similarly the nine wheelchair units would meet the relevant minimum internal size standards for the size of unit:

Unit size (bedroom / person)	SPD minimum unit area	Proposed unit range (sqm)
one-bedroom /2 person	50sqm as a one-storey unit	50.5 – 54 sqm
two-bedroom/3 person	75sqm as a one-storey wheelchair unit	75 - 76 sqm
two-bedroom/4 person	70sqm as a one-storey unit 85sqm as a one-storey wheelchair unit	70.6 – 77sqm 93 – 97sqm
three-bedroom/5 person	93sqm as a two-storey unit	108 – 116sqm
four-bedroom/6 person	106sqm as a two-storey	113 – 118sqm

	unit	
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### *Accessibility*

76. London Plan policy 3.8 provides specific targets for inclusive accessibility by requiring 90% of new housing to meet Building Regulation M4(2) “accessible and adaptable dwellings” and 10% should meet Building Regulation requirement M4(3) “wheelchair user dwellings” by being designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
77. Nine two-bedroom units are proposed as wheelchair units, representing 10% of the units and habitable rooms, and nine wheelchair parking spaces are proposed. The ground floor maisonettes would have their own front doors. The flats and upper maisonettes would be accessed by two cores each with two lifts and a stair core.
78. A condition is proposed regarding compliance with Building Regulation M4(2) and M4(3), and the planning obligation would require compliance with the SELWHDG for the affordable wheelchair units.

### *Outlook and aspect*

79. Of the 87 units proposed, the clear majority (62 units – 70%) would be dual aspect or triple aspect. Of the remaining 25 units, 23 would have a limited secondary outlook across the recessed balcony and only 2 units are solely single aspect. Overall there is a predominance of dual aspect units.
80. The external deck accesses for the maisonettes would be directly outside the kitchen windows for these maisonettes, with the main living rooms and bedrooms being more private. With the low numbers of maisonettes sharing a deck (up to 6), this is considered acceptable.
81. The two wings of the proposed building would be set 20m apart, allowing for a suitable level of privacy and outlook for the units facing across the courtyard.
82. The ground floor maisonettes would have their own front areas next to their front doors, and their rear amenity areas providing separation between the windows and pedestrian routes. Further information on the boundary treatment and any landscaping of these areas would be required by condition.

### *Internal daylight and sunlight provision*

83. A daylight and sunlight report has been provided for the proposed units which shows that of the 289 habitable rooms assessed in the scheme, 222 (76%) would receive ADF values at, or in excess of, the BRE’s recommendations. This leaves 67 rooms across the block with ADF levels below the recommended values; this is a result of the recessed balconies to some of the flats and maisonette windows, and the overhang of the decked accesses to the maisonettes.
84. Of the 67 rooms that have ADF values below; 25 are kitchens in maisonettes and 8 are living rooms where the ADFs of 1.3-1.4 are slightly below the 1.5 recommend. As the main rooms to the maisonettes generally meet the ADF values and in view of the generous size of these units, it is considered overall to result in a good quality living space.
85. Another 32 windows to the combined living/kitchen/dining rooms to flats would receive low ADF values due to the recessed balconies and despite the full height windows that have tried to maximise the possible daylight. The other rooms to these units (the

bedrooms) would receive good daylight levels in excess of the minimum ADF, so on balance the quality of these units is considered to be acceptable.

86. Two bedrooms to two one-bedroom flats on the top floor would receive ADFs of 0.9, just below the 1.0 sought for a bedroom despite the full height glazing; as their living rooms would receive high ADFs of 2.5 and their private terraces would receive sunlight, the overall light to these units is considered acceptable.

#### *Amenity space and children's play space*

87. The Residential Design Standards SPD sets out the minimum amenity space requirement for new dwellings. Each unit would have some private amenity space of at least 5sqm, and all three-bedroom or larger units would have at least 10sqm of private amenity space. There is shortfall of 174sqm of private amenity space overall, plus the requirement for an additional 50sqm of communal space which the central courtyard area and proposed fourth floor communal area would more than make up for. The courtyard would receive sunlight in the morning until 1pm on 21st March when it would be overshadowed by the proposed block, and 84% of the area in the courtyard and landscaping along the south-western side would receive at least 2 hours of sunlight on 21 March.
88. The existing grassed area in front of Thaxted Court (of approximately 450sqm) would be removed by the proposal, and a revised layout with a central courtyard area is proposed for both existing residents of Thaxted Court, the additional residents from the Thaxted Court extension, and the proposed Bede Centre units.
89. Policy 3.6 of the London Plan and Core Strategy policy 11 set out the requirements for children's play space. Using the GLA playspace calculator, a total of 710 sqm of play space would be required (310sqm for under 5s, 240sqm for 5-11 year olds and 160sqm for 12 years and older). There is sufficient space within the courtyard area to provide for the shortfall in amenity space plus the 310sqm requirement for under 5s, even once the manoeuvring space for the infrequent sub-station vehicles (which need to cross the courtyard) has been excluded. This play space would be overlooked by Thaxted Court and the proposed building. The courtyard is large enough to also provide up to 110sqm of playspace for under 5s in Thaxted Court.
90. The submitted Landscape Strategy includes a play strategy setting out potential typologies to be incorporated in the landscaping, seating, climbable objects, fixed equipment, and linking features across the courtyard. Further incidental opportunities, such as the hardstanding area in front of the substation may provide opportunities for basketball etc for older children. The new park entrance would also provide ready access to the wider Southwark Park spaces for children and residents of the proposed units. A condition to require further details of the playspace and play features is proposed to ensure it sufficient play provision for under 5s is incorporated into the courtyard.
91. Provision for older children (5-11 years old, and older) would need to be made off-site, and the applicant has suggested such provision be made in Southwark Park given the proximity to the site. A financial contribution of 270sqm + 180sqm x £151 = £67,950 would be required through the legal agreement.

#### *Noise and pollution*

92. Conditions are suggested regarding internal noise levels, external amenity space noise levels, plant noise levels, gas boiler emissions, and contamination investigation and mitigation to ensure the new housing is of a suitable quality.

## Density

93. London Plan policies 3.3 and 3.4 seek to increase housing supply and optimise housing potential through intensification and mixed use redevelopment. Table 3.2 of the London Plan suggests a density of 200-700 habitable rooms per hectare for a site in an urban setting with a PTAL of 4-6. Core Strategy policy 5 “Providing new homes” sets the expected density range for new residential development across the borough. This site is within the urban density zone, where a density of 200-700 habitable rooms per hectare is anticipated. Southwark Plan policy 3.11 requires developments to ensure they maximise efficient use of land.
94. The application site area is 0.51 hectares, however this includes a length of Abbeyfield Road. Excluding the area of highway, the site area reduces to 0.387 hectares. With 270 habitable rooms proposed this results in a density of 697 habitable rooms per hectare which is within the range for the urban density zone.

## Impact of adjoining and nearby uses on occupiers and users of proposed development

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

### *Daylight and sunlight impacts*

96. The submitted daylight and sunlight report considers the cumulative impacts of the Maydew House and Bede Centre proposals. The cumulative results are summarised in the tables below.

### Daylight impact to windows – Vertical Sky Component test

Address	Number of windows assessed	Passes VSC test	Fails VSC test
Bradley House	126	125	1
Damory House	196	130	66
Benwick Close	36	28	8
Anthony House	54	51	3
30 Abbeyfield Road	11	2	9
Thaxted Close	131	45	86
<b>Totals</b>	<b>554</b>	<b>381 (69%)</b>	<b>173 (31%)</b>

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

Address	Number of rooms assessed	Passes NSL test	Fails NSL test
Bradley House	119	119 (100%)	0
Damory House	98	93 (95%)	5 (5%)
Benwick Close	30	30 (100%)	0
Anthony House	54	51 (94%)	3 (6%)

30 Abbeyfield Road	11	2 (18%)	9 (82%)
Thaxted Close	84	45 (53%)	39 (47%)
<b>Totals</b>	<b>396</b>	<b>340 (86%)</b>	<b>56 (14%)</b>

97. The submitted daylight report shows that the proposed Bede Centre redevelopment and extensions to Maydew House would have the following combined effects:

- Bradley House – one ground floor window would experience a 21% reduction in both VSC and NSL. The other windows to this unit would not experience a significant reduction, so this reduction slightly above a noticeable level is considered not to affect the amenity of this unit.
- Damory House – 66 windows would experience a noticeable reduction in daylight; these windows have very low daylight levels already (of between 1% and 7% VSC) due to the recessed location of the windows behind the projecting balconies and deck accesses. While five first floor rooms would experience a noticeable reduction in daylight distribution of up to 33%, the adjacent larger rooms would retain good daylight distribution, and given the location of these units in the centre of the block it is more likely that the Maydew House works are affecting these properties than the Bede Centre. Benwick Close – 8 windows would experience a noticeable reduction in daylight, however these windows have very low daylight levels already (1.7%-4.4% VSC). The daylight distribution to the 30 rooms would not be affected. Given the distance between Benwick Close and the Bede Centre these impacts are more likely to be due to the Maydew House extension.
- Anthony House – 3 windows on the flank would experience a noticeable reduction in VSC to give proposed VSC levels of 17.4-22%, and would also experience a loss of daylight distribution to 25-44% of the assumed room area. They would retain relatively good levels of daylight for an urban area with the massing of the proposal, and with other windows on the front and rear of these flats, the overall quality of these flats would be acceptable.
- 30 Abbeyfield Road – 9 windows serving 9 rooms would experience a significant reduction in VSC and also in daylight distribution of up to 82% (based on assumed room layouts), however three of these are hallways and are not habitable rooms. The 6 windows serving habitable rooms currently look onto an open site and so benefit from good daylight distribution, unusually so for an urban location. The resulting VSC levels of 13.8-19.9% are considered to be relatively good daylight levels, and given the separation distance of 22m to the proposed block, the daylight impacts are not considered to warrant amendments or refusal of the application.
- Thaxted Court – 86 windows would experience a significant reduction in VSC, however the testing has separated different panes of glass that form the same window or glazed front entrance which combined serve one room (often a hallway). Therefore once the hallways and bathrooms are removed, 24 habitable rooms would have a significant reduction in VSC (14 kitchens, 4 bedrooms and 6 living rooms). The 14 kitchens have low existing VSC values of 0.4-7% VSC due to their high cill levels, recessed location below the overhanging balconies and deck accesses above and screens next to windows. Bedrooms would retain good VSC levels of 14-22.5% and living rooms of 10.2-17.4% VSC and are also affected by projections above the windows. In terms of daylight distribution of the 39 rooms in Thaxted Court would experience a significant reduction and the pattern of affected rooms is similar to the VSC results – 24 serve non-habitable rooms, 11 serve kitchens which currently have limited distribution for the reasons set out above, 2 serve bedrooms and 2 serve living rooms. Three first floor flats have a bedroom and/or living room affected but on balance the daylight impacts

to these rooms is considered acceptable as part of the overall amenity of these neighbouring properties.

### *Sunlight*

98. The rooms of neighbouring properties which have windows facing within 90 degrees of south have been tested in terms of the sunlight they would receive with both the Bede Centre and Maydew House proposals.

### **Sunlight tests to rooms – Annual Probable Sunlight Hours test**

<b>Address</b>	<b>Number of rooms assessed facing within 90 degrees of south</b>	<b>Passes APSH test</b>	<b>Fails APSH test</b>
Bradley House	78	78 (100%)	0
Damory House	98	90 (92%)	8 (8%)
Benwick Close	3	0	3 (100%)
Anthony House	n/a	n/a	n/a
30 Abbeyfield Road	n/a	n/a	n/a
Thaxted Close	35	30 (86%)	5 (14%)
<b>Totals</b>	<b>214</b>	<b>198 (93%)</b>	<b>16 (7%)</b>

99. The rooms that would have a noticeable reduction in sunlight levels already have low sunlight levels:

- Damory House – 8 rooms currently receive between 9 and 11 annual probable sunlight hours, making the reduction to 6 annual probable sunlight hours a high percentage.
- Benwick Close – 3 rooms currently receive low levels of sunlight (3 hours throughout the year), meaning the reduction to 2 annual probable hours throughout the year is a high proportion.
- Thaxted Close – 5 rooms have low annual sunlight hours (9 hours) so that the reduction to between 1 and 8 hours of annual sunlight hours is a high proportion.

100. The reduction in sunlight levels to these rooms with currently low sunlight levels is considered not to significantly affect the amenity of these rooms and neighbouring properties. The impacts to Damory House and Benwick Close are more likely to be due to the Maydew House extension rather than the Bede Centre redevelopment.

### *Overshadowing of gardens and Southwark Park*

101. The proposed block would overshadow the western end of Damory House at 8am on 21 March, but for the rest of the morning its shadow would move across the landscaped area in front of Maydew House until noon, when its shadow would reach the boundary with Southwark Park and extend across the park until sunset.
102. The block would not prevent any of the surrounding neighbouring gardens, Southwark Park or the new public square from receiving at least two hours of sunlight on 21 March, which is the key date suggested by the BRE guidance.

### *Overlooking, privacy and outlook*

103. The Residential Design Standards SPD requires developments to achieve a minimum

of 12m separation distance between windows at the front of the building and any elevation that fronts onto a highway, and a minimum of 21m at the rear of the building.

104. There are no side windows in the flank of the closest end of Thaxted Court, but the existing Thaxted Court properties and those in the proposed extension have balconies and shared deck accesses. The windows in the flank of the proposed northern wing of the block would face onto the balconies of the existing Thaxted Court balconies (and the balconies of the proposed Thaxted Court extension) at a distance of 8m. When the existing overlooking possible from the first floor podium in front of Thaxted Court is considered, this proposed relationship at increase distance and revised orientation, would not be an unneighbourly relationship.
105. The north-east facing windows of the proposed southern wing would face onto the Thaxted Court windows at a distance of 18m. The south-east facing windows of the proposed southern wing would face the other wing of Thaxted Court at a distance of 21m.
106. On the other side of the proposed block, the windows on the south-western side would face across the highway at a distance of 21m from the front windows of no. 30 Mossington Gardens and flank windows of Anthony House; this would not cause a material loss of privacy for these neighbouring properties.
107. The proposed windows on the north-western side of the block would be 17m from the façade of Maydew House (facing onto the lift and stair core); this relationship is considered to be acceptable.
108. Due to these separation distances and orientation of the adjoining properties, the proposed block is considered not to be intrusive or overbearing to the outlook from neighbouring properties.

#### *Noise and pollution*

109. The introduction of residential use on this site which is surrounded by other residential blocks is considered not to raise noise and disturbance issues.
110. Conditions are proposed regarding external lighting and a construction environmental management plan to minimise pollution to neighbouring properties.

#### **Transportation and highways**

111. London Plan policies on transport seek to ensure major developments are located in accessible locations, and support improvements to sustainable transport modes. Core Strategy policy 2 encourages sustainable transport to reduce congestion, traffic and pollution. Policies 5.1 "Locating developments", 5.2 "Transport impacts", 5.3 "Walking and cycling", 5.6 "Car parking" and 5.7 "Parking standards for disabled people and the mobility impaired" seek to direct major developments towards transport nodes, provide adequate access, servicing, facilities for pedestrians and cyclists, and to minimise car parking provision while providing adequate parking for disabled people.

#### *Car parking and highway works*

112. The site has a PTAL of 4. There is parking in front of Thaxted Court and in the undercroft space below the existing Bede Centre which would be removed by the proposal.
113. The only on-site parking proposed are wheelchair parking spaces. Five wheelchair parking spaces are proposed alongside the proposed building and a further five at the

eastern end of Abbeyfield Road (where the estate road is not adopted highway). While echelon (angled) parking is not acceptable on the public highway, the angled parking bays at the eastern end of Abbeyfield Road are not on the public highway. The ten off-highway wheelchair parking spaces would be available to residents of the Bede Centre redevelopment and the additional flats in Maydew House and Thaxted Court. Further detail on the car parking management would be secured through the unilateral undertaking. A condition is proposed to prevent residents of these new units being eligible for CPZ permits (unless they are a blue badge holder).

114. The Housing team's ambitions for the highway works across the Abbeyfield Estate including making Abbeyfield Road (where it is adopted public highway) a shared space for cars, cyclists and pedestrians are outside the scope of this planning application, and are not necessary to make the Bede Centre redevelopment acceptable in planning terms. Therefore it is not suggested that the works to the public highway be secured by a planning obligation in the unilateral undertaking.

#### *Cycle parking*

115. Cycle parking would be provided in two enclosed cycle stores at ground level next to the archway entrance, with a total of 146 cycle spaces which accords with the London Plan requirements. Six Sheffield stands would provide an additional 12 spaces for visitors. A condition to require further information on the detail is proposed.

#### *Refuse storage and servicing*

116. A refuse store and a bulk waste store are proposed on the ground floor at the northern side of the building. While the 14 bins indicated would not provide sufficient capacity, there would be sufficient space to accommodate three more bins (while still all be useable) within these stores. Refuse vehicles would be able to cross the public realm proposed between Maydew House and the Bede Centre development to collect from both developments. A condition to require further details is proposed.

#### *Construction phase*

117. A construction logistics plan would be required by a proposed condition in line with the recommendation from the Environmental Protection Team, TfL and transport team.

#### **Trees and ecology**

118. Policies 5.10 and 5.11 of the London Plan encourage urban greening, and green walls and roofs, and policy 7.19 seeks positive contributions to biodiversity. Core Strategy policy 11 "Open spaces and wildlife" requires new developments to improve habitat. Saved policy 3.28 "Biodiversity" of the Southwark Plan encourages the inclusion of features which enhance biodiversity.
119. There are two mature trees within Southwark Park close to the site boundary which overhang into the site. There are street trees within the application site, and one in the grassed area outside Thaxted Court. A certificate of lawfulness was previously given to remove the large London plane tree in the centre of the raised bed in front of Thaxted Court (ref. 16/AP/5001), which needs to be removed for the proposed building.
120. The submitted ecological assessment considers the site to be of negligible ecological value, with the potential for breeding birds to be present on the site and in the Park, and hedgehogs in the area. It concludes the proposed development would have a neutral impact on habitats and species subject to mitigation (such as the tree protection measures), and that the proposed ecological enhancements such as native

planting and bird boxes would be beneficial. A bat survey was undertaken during the course of the application's consideration, and the ecology officer agrees with its findings. The biodiverse roof is welcomed and along with bird and bat boxes would be secured by a recommended condition.

121. The proposed new courtyard landscaping proposes a grid design defined by blocks of soft landscape which reference the grove planting pattern to the public square proposed in front of Maydew House, helping to give the sense of a coherent masterplan. Together with screening to ground floor units, the variety of smaller spaces within the courtyard provides an intimate character and feel. The design is then interlinked by a sculptural concrete play ribbon combining seating as part of a pathway between play spaces. Other proposed features include raised planters with woodland underplanting, uplighting and quality surfaces, all of which are of design merit.
122. The additional landscaping is proposed to enhance the Southwark Park boundary and improve access via a new park entrance (proposed in the current Maydew House application ref. 17/AP/0527), and the landscape design would be consistent across the two application sites. The replacement shrub planting within the Park (following the removal of the construction hoarding) would need to be carried out with the approval of the council's Parks Team, with arrangements for the additional maintenance cost to be included in the unilateral agreement.
123. Overall, a welcome amount of new hard and soft landscaping is proposed following lengthy pre-application design and masterplan discussions which these designs adhere to. These result in enhanced landscaping and amenity for the wider area and more than compensate for the loss of the plane tree in front of Thaxted Court.
124. Tree protection measures and further landscape details would be conditioned to ensure the quality aspired to is provided and a replacement stem girth is provided in the landscaping and some minor amendments to species and sizes may also be required.

### **Sustainability (including energy, flood risk, drainage and contamination)**

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

### *Energy*

126. The Energy Statement shows that the scheme would achieve a 48.7% reduction in carbon emissions against Part L of Building Regulations 2013 through energy efficiency measures, connection to the South East London Combined Heat and Power district heating network, and PV panels on the roof. Additional reports have been provided to address the GLA's comments regarding over-heating, worksheet calculations, district heating and the PV panels to the roof. The remaining carbon emissions would need to be offset through a payment towards the carbon offset fund of  $64.1 \times \text{£}1800 = \text{£}115,380$  (indexed). This would be secured by a planning obligation to ensure compliance with London Plan policy 5.2.

### *Flooding and drainage*

127. The site is within flood zone 3 and a flood risk assessment has been provided. The majority of the site is currently covered in hardstanding and buildings with the exception of the grassed area in front of Thaxted Court. The Environment Agency and the council's flood risk management team raised objection to the ground floor flat originally proposed and requested updated modelling work be undertaken. The ground floor flat was removed from the proposal, and part of its floorspace used to extend the adjoining maisonette to provide a dining room. The Environment Agency and the council's flood team now consider the amended proposal to be acceptable. Compliance with the flood risk assessment, and a flood emergency and evacuation plan would be required by conditions.
128. An indicative surface water drainage network has been designed, with tank storage to attenuate the flows. The drainage strategy was amended to be acceptable to the flood risk management team, and further information on the final scheme would be required by condition.

### *Contamination*

129. The Environmental Protection Team recommends a condition for site investigation works and contamination risk assessment to ensure any contamination of the site is sufficiently investigated and mitigated in the construction. Subject to this condition, the proposal would comply with Core Strategy policy 13 and saved policy 3.2 of the Southwark Plan.

### *Archaeology*

130. The application site is not within an Archaeological Priority Zone. The site was previously occupied by terraced housing, as shown on the historic map series until at least the 1960s, but the general area suffered (to the southwest) extensive bomb damage during the London Blitz in the Second World War. The construction of the terrace housing, combined with the subsequent development phases will have had a significant impact on the potential archaeological resource. The Greater London Historic Environment Record (GLHER) does not have any entries for the site or the surrounding study area, the nearest heritage asset is the former Clare College mission church.
131. Appraisal of this planning application using the GLHER and information submitted with the application indicates that, in this instance, it can be concluded that the archaeological resource will not be compromised by these works. No further archaeological assessment, fieldwork or conditions are required in consideration of this application.

### **Planning obligations and Community Infrastructure Levy**

132. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration, however the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance it is estimated that a Mayoral CIL payment of (£356,724 pre-relief) and Southwark CIL payment (£1,755,090 pre-relief) would be payable in the event planning permission is granted and payment of the Mayoral CIL would accord with policy 8.3 of the London

Plan.

133. As the council owns the land, it is necessary for the council to enter into a unilateral undertaking confirming that the planning obligations will be paid and/or provided. A unilateral undertaking is a type of planning agreement that will bind the land in the same way that a section 106 agreement does. It is considered appropriate here because the council cannot covenant with itself, which would be necessary if a section 106 agreement was required. Should the land be disposed of in the future, the unilateral undertaking to be provided would require any successor in title to enter into a section 106 agreement in the usual way. This is the approach the council has adopted on all Hidden Home, Direct Delivery and Southwark Regeneration in Partnership Programme schemes.

134. The following table sets out the required site specific mitigation and the applicant's position with regard to each point:

<b>Planning obligation</b>	<b>Mitigation</b>	<b>Applicant's position</b>
Affordable housing	<p>Provision of 87 affordable units to be provided on site:</p> <ul style="list-style-type: none"> <li>• 57 units (15 x one-bedroom flats, 23 x two-bedroom flats, 16 x three-bedroom maisonettes and 3 x four-bedroom maisonettes) social rent tenure units and</li> <li>• 30 units (15 x one-bedroom flats, 8 x two-bedroom flats and 7 x three-bedroom maisonettes) as intermediate rent tenure units.</li> </ul> <p>Income thresholds and eligibility criteria for the tenures would be included. Viability review if less than this affordable provision is to be provided on site.</p>	Agreed
Carbon offset Green Fund	<p>Payment of £115,380 (indexed) based on the shortfall of 64.1 tones of carbon per year over a 30 year period. Achievement of the 48.7% carbon reduction set out in the submitted Energy Strategy.</p>	Agreed
Car club	Provision of three years membership for each eligible resident	Agreed
Car parking	A car parking management plan detailing the management and allocation of the proposed off-street wheelchair parking bays	Agreed
Children's play space	Payment of £60,400 (indexed) to address the 400sqm shortfall of on-site play space for children aged over 5 years old.	Agreed
Delivery and servicing plan	Detailing the arrangements for deliveries and servicing across all three sites	Agreed
District heat network	To connect to the South East London Combined Heat and Power district heating network.	Agreed
Employment and enterprise	Contribute towards the cumulative targets of 29 jobs), 29 short courses and 7 apprenticeships during construction period for the 3 applications in the Abbeyfield Estate (or the equivalent contribution in line with the	Agreed

	S106 SPD). Local procurement and supply chain measures during the construction phase.	
Phasing of works between Bede Centre and Maydew sites	To ensure the existing Bede Centre is not demolished until the replacement community provision in Maydew House has been completed and is ready for occupation.	Agreed
Wheelchair housing	Provision of 9 affordable rent wheelchair units to SELWHDG standards.	Agreed
Administration charge (2%)	Payment to cover the costs of monitoring these necessary planning obligations calculated as 2% of total sum £175,780 = £3,515.60 (indexed)	Agreed

135. These obligations are necessary in order to make the development acceptable in planning terms, and to ensure the proposal accords with policies in the Southwark Plan, Core Strategy, London Plan, and the Section 106 Planning Obligations and CIL SPD regarding the provision of affordable homes, zero carbon residential dwellings, wheelchair housing, construction jobs and children's play space.
136. In the event that a satisfactory legal agreement has not been entered into by 31 May 2018 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

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

#### **Other matters**

137. None

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

138. The proposed works form part of the wider improvement plans for the Abbeyfield Estate and have been designed to fit in with the adjoining Maydew House and Thaxted Court proposals.
139. The principle of the redevelopment of the Bede Centre is supported, with the re-provision of an enlarged community space included in the proposed works to Maydew House. The scheme would provide replacement affordable housing for that to be lost with the Maydew House proposal, and additional affordable units. The phasing of works would be secured through the unilateral agreement to ensure the community facilities are not lost. The amenity of the proposed housing and its external design would be high quality, of a scale and massing appropriate for this site. It would at least preserve the setting of the listed Southwark Park and grade II listed Dilston Grove building, and would not cause harm to neighbour amenity. Through conditions and unilateral undertaking the quality of the building (as 100% affordable housing), the landscaping, playspace and highway works would be secured, and an appropriate carbon off-set payment.
140. The proposal complies with planning policies and is recommended for approval,

subject to conditions, the completion of a unilateral undertaking, and receipt of the stage 2 comments from the Mayor of London.

### **Community impact statement**

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

a) The impact on local people is set out above.

### **Consultations**

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

### **Consultation replies**

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

#### Summary of consultation responses

144. No public responses were received.

145. The following summarised responses were received from statutory consultees.

146. **Ecology officer** – required a bat survey to be undertaken as the site adjoins Southwark Park and the preliminary ecology assessment to be updated. The mature trees in the Park should be protected. Supports the biodiverse roof. The subsequently submitted survey is comprehensive and meets best practice with no further surveys required.

147. **Environment Agency** – has no objection (having withdrawn the earlier objection to the ground floor flat, and need to use the latest flood modelling). The mitigation measures in the flood risk assessment should be adhered to regarding flood resilience, flood warning and design considerations.

148. **Flood risk management team** – considers the proposal acceptable now that the ground floor sleeping accommodation has been removed.

149. **GLA** – a combined response for the two applications (for the Bede Centre redevelopment, and the extensions to Thaxted Court and Damory House) was provided. This sets out the remedies needed to the applications to address deficiencies and ensure compliance with the London Plan:

- Estate regeneration: The proposals meet the requirements of the Mayor's draft Good Practice Guide to Estate Regeneration, with existing affordable housing to be replaced on a like-for-like basis, the right of return for tenants, a fair deal for leaseholders, and a fair and transparent consultation. The estate regeneration programme is strongly supported, subject to a robust mechanism for linking the sale of market units to the delivery of the social housing.
- Social infrastructure: The replacement of the Bede Centre with improved/expanded facilities is strongly supported and its delivery must be secured before the demolition of the existing space.
- Affordable housing: The provision of 100% affordable housing is strongly

supported.

- Transport: A cycling level of service assessment is required to establish if improvements are required to connect to designated cycle routes.
- Climate change: Further information is required on overheating, worksheet calculations, the site heat network, district heating, and photovoltaic installation, before the proposals can be considered acceptable and the carbon dioxide savings verified.

150. *Officer response:* The first three bullet points are supportive of the Bede Centre scheme and a linking mechanism for the community use and affordable units would be included in the unilateral undertaking. Additional information on the climate change topics was provided for the Bede Centre application, and a cycling level of service assessment to address the transport comment.

151. **London Fire and Emergency Planning Authority** – is satisfied with the proposals in relation to the fire precautionary arrangements subject to adequate Fire Brigade access for firefighting and rescue. Compliance to be confirmed by statutory Building Control consultation.

152. **Transport for London** – The following issues stand to be resolved:

- The Cycling Levels of Service Assessment provided shows that Rotherhithe New Road, Raymouth Road and the section of Southwark Park Road between Raymouth Road and Camilla Road offer cyclists a particularly low level of service, and access from the south is compromised. TfL suggests the applicant offers a contribution to improve two junctions that link the Abbeyfield Estate into Southwark Park (Aspinden Road or Nelldale Road), and opening up new cycling connections under the railway lines. .
- A construction logistics plan following TfL's new guidance should be provided and secured by condition;
- Conditions securing the use of the parking spaces for Blue Badge holders only, the provision of at least London Plan policy compliant electric vehicle charging points, and a Car Parking Management Plan;
- Conditions should secure; the cycle parking quantum and design; a delivery and servicing plan; details of drop off/pick up arrangements for residents and their visitors especially those with mobility issues; and 24/7 public access through and around the development.

153. *Officer response:* the highway and landscaping improvements across the Abbeyfield Estate indicated by the Housing team (outside the planning applications) and the new access to Southwark Park would improve cycle facilities in the area around the site. This is a Council-own application; the Council is already looking at ways to improve "quietway" connections in the area for cyclists. Further details of cycle parking and construction logistics would be secured by conditions and the unilateral undertaking.

### **Human rights implications**

154. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

155. This application has the legitimate aim of providing new affordable housing and public realm improvements. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/H66  Application file: 17/AP/2908  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: <a href="mailto:planning.enquiries@southwark.gov.uk">planning.enquiries@southwark.gov.uk</a> Case officer telephone: 020 7525 1412 Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>

## APPENDICES

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

## AUDIT TRAIL

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Victoria Crosby, Senior Planner	
<b>Version</b>	Final	
<b>Dated</b>	17 January 2018	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES /CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		29 January 2018

# APPENDIX 1

## Consultation undertaken

**Site notice date:** 21/08/2017

**Press notice date:** 17/08/2017

**Case officer site visit date:** n/a

**Neighbour consultation letters sent:** 18/08/2017

### Internal services consulted:

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

### Statutory and non-statutory organisations consulted:

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

### Neighbour and local groups consulted:

3 Westbrook Road London SE3 0NS  
Via Email x  
Flat 34 Bradley House SE16 2DL  
Flat 35 Bradley House SE16 2DL  
Flat 32 Bradley House SE16 2DL  
Flat 33 Bradley House SE16 2DL  
Flat 36 Bradley House SE16 2DL  
Flat 39 Bradley House SE16 2DN  
Flat 40 Bradley House SE16 2DN  
Flat 37 Bradley House SE16 2DL  
Flat 38 Bradley House SE16 2DL  
Flat 31 Bradley House SE16 2DL  
Flat 24 Bradley House SE16 2DL  
Flat 25 Bradley House SE16 2DL  
Flat 22 Bradley House SE16 2DL  
Flat 23 Bradley House SE16 2DL  
Flat 26 Bradley House SE16 2DL  
Flat 29 Bradley House SE16 2DL  
Flat 30 Bradley House SE16 2DL  
Flat 27 Bradley House SE16 2DL  
Flat 28 Bradley House SE16 2DL  
Flat 53 Bradley House SE16 2DN  
Flat 54 Bradley House SE16 2DN  
Flat 51 Bradley House SE16 2DN  
Flat 52 Bradley House SE16 2DN

89 Raymouth Road London SE16 2DA  
83 Raymouth Road London SE16 2DA  
85 Raymouth Road London SE16 2DA  
93 Raymouth Road London SE16 2DA  
99 Raymouth Road London SE16 2DA  
15 Aspinden Road London SE16 2DR  
95 Raymouth Road London SE16 2DA  
97 Raymouth Road London SE16 2DA  
81 Raymouth Road London SE16 2DA  
105 Raymouth Road London SE16 2DA  
69 Raymouth Road London SE16 2DA  
101 Raymouth Road London SE16 2DA  
103 Raymouth Road London SE16 2DA  
71 Raymouth Road London SE16 2DA  
77 Raymouth Road London SE16 2DA  
79 Raymouth Road London SE16 2DA  
73 Raymouth Road London SE16 2DA  
75 Raymouth Road London SE16 2DA  
26 Pedworth Gardens London SE16 2DX  
28 Pedworth Gardens London SE16 2DX  
22 Pedworth Gardens London SE16 2DX  
24 Pedworth Gardens London SE16 2DX  
30 Pedworth Gardens London SE16 2DX  
36 Pedworth Gardens London SE16 2DX  
38 Pedworth Gardens London SE16 2DX

Flat 55 Bradley House SE16 2DN  
Flat 58 Bradley House SE16 2DN  
Flat 59 Bradley House SE16 2DN  
Flat 56 Bradley House SE16 2DN  
Flat 57 Bradley House SE16 2DN  
Flat 50 Bradley House SE16 2DN  
Flat 43 Bradley House SE16 2DN  
Flat 44 Bradley House SE16 2DN  
Flat 41 Bradley House SE16 2DN  
Flat 42 Bradley House SE16 2DN  
Flat 45 Bradley House SE16 2DN  
Flat 48 Bradley House SE16 2DN  
Flat 49 Bradley House SE16 2DN  
Flat 46 Bradley House SE16 2DN  
Flat 47 Bradley House SE16 2DN  
Flat 21 Bradley House SE16 2DL  
5 Aspinden Road London SE16 2DR  
91 Raymouth Road London SE16 2DA  
Aspinden Wood Centre 1 Aspinden Road SE16 2DR  
3 Aspinden Road London SE16 2DR  
61 Raymouth Road London SE16 2DA  
67 Raymouth Road London SE16 2DA  
Flat 1 Bradley House SE16 2DL  
63 Raymouth Road London SE16 2DA  
65 Raymouth Road London SE16 2DA  
Flat 9 Antony House SE16 2DJ  
Flat 2 Antony House SE16 2DJ  
Flat 3 Antony House SE16 2DJ  
Flat 15 Antony House SE16 2DJ  
Flat 16 Antony House SE16 2DJ  
Flat 4 Antony House SE16 2DJ  
Flat 7 Antony House SE16 2DJ  
Flat 8 Antony House SE16 2DJ  
Flat 5 Antony House SE16 2DJ  
  
Flat 6 Antony House SE16 2DJ  
Flat 14 Bradley House SE16 2DL  
Flat 15 Bradley House SE16 2DL  
Flat 12 Bradley House SE16 2DL  
Flat 13 Bradley House SE16 2DL  
Flat 16 Bradley House SE16 2DL  
Flat 19 Bradley House SE16 2DL  
Flat 20 Bradley House SE16 2DL  
Flat 17 Bradley House SE16 2DL  
Flat 18 Bradley House SE16 2DL  
Flat 11 Bradley House SE16 2DL  
Flat 4 Bradley House SE16 2DL  
Flat 5 Bradley House SE16 2DL  
Flat 2 Bradley House SE16 2DL  
Flat 3 Bradley House SE16 2DL  
Flat 6 Bradley House SE16 2DL  
Flat 9 Bradley House SE16 2DL  
Flat 10 Bradley House SE16 2DL  
Flat 7 Bradley House SE16 2DL  
Flat 8 Bradley House SE16 2DL  
Flat 60 Bradley House SE16 2DN  
8 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
9 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
6 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
7 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
1 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
12 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
13 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
10 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
11 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
5 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
30 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
31 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
29 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
3 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
32 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
35 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
4 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
33 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
34 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
3 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
4 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
23 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
24 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
  
32 Pedworth Gardens London SE16 2DX  
34 Pedworth Gardens London SE16 2DX  
20 Pedworth Gardens London SE16 2DX  
21 Aspinden Road London SE16 2DR  
10 Pedworth Gardens London SE16 2DX  
17 Aspinden Road London SE16 2DR  
19 Aspinden Road London SE16 2DR  
12 Pedworth Gardens London SE16 2DX  
18 Pedworth Gardens London SE16 2DX  
2 Pedworth Gardens London SE16 2DX  
14 Pedworth Gardens London SE16 2DX  
16 Pedworth Gardens London SE16 2DX  
52 Abbeyfield Road London SE16 2BX  
Room 21 Aspinden Wood Centre SE16 2DR  
Room 22 Aspinden Wood Centre SE16 2DR  
Room 2 Aspinden Wood Centre SE16 2DR  
Room 20 Aspinden Wood Centre SE16 2DR  
Room 23 Aspinden Wood Centre SE16 2DR  
Room 3 Aspinden Wood Centre SE16 2DR  
Room 4 Aspinden Wood Centre SE16 2DR  
Room 24 Aspinden Wood Centre SE16 2DR  
Room 25 Aspinden Wood Centre SE16 2DR  
Room 19 Aspinden Wood Centre SE16 2DR  
Room 11 Aspinden Wood Centre SE16 2DR  
Room 12 Aspinden Wood Centre SE16 2DR  
Room 1 Aspinden Wood Centre SE16 2DR  
Room 10 Aspinden Wood Centre SE16 2DR  
Room 14 Aspinden Wood Centre SE16 2DR  
Room 17 Aspinden Wood Centre SE16 2DR  
Room 18 Aspinden Wood Centre SE16 2DR  
Room 15 Aspinden Wood Centre SE16 2DR  
Room 16 Aspinden Wood Centre SE16 2DR  
Flat 4 30 Abbeyfield Road SE16 2AR  
Abbeyfield Tenants And Residents Committee Hall  
Maydew House Abbeyfield Estate SE16 2DP  
Flat 2 30 Abbeyfield Road SE16 2AR  
Flat 3 30 Abbeyfield Road SE16 2AR  
42 Abbeyfield Road London SE16 2BX  
48 Abbeyfield Road London SE16 2BX  
50 Abbeyfield Road London SE16 2BX  
44 Abbeyfield Road London SE16 2BX  
46 Abbeyfield Road London SE16 2BX  
Flat 1 30 Abbeyfield Road SE16 2AR  
Room 7 Aspinden Wood Centre SE16 2DR  
Room 8 Aspinden Wood Centre SE16 2DR  
Room 5 Aspinden Wood Centre SE16 2DR  
Room 6 Aspinden Wood Centre SE16 2DR  
Room 9 Aspinden Wood Centre SE16 2DR  
57 Raymouth Road London SE16 2DA  
59 Raymouth Road London SE16 2DA  
Ground Floor Flat 99 Raymouth Road SE16 2DA  
31a Frankland Close London SE16 2HD  
4 Pedworth Gardens London SE16 2DX  
6 Benwick Close London SE16 2HE  
7 Benwick Close London SE16 2HE  
4 Benwick Close London SE16 2HE  
5 Benwick Close London SE16 2HE  
8 Benwick Close London SE16 2HE  
Flat 10 Roderick House SE16 2DH  
Flat 11 Roderick House SE16 2DH  
9 Benwick Close London SE16 2HE  
Flat 1 Roderick House SE16 2DH  
3 Benwick Close London SE16 2HE  
41 Frankland Close London SE16 2HD  
42 Frankland Close London SE16 2HD  
39 Frankland Close London SE16 2HD  
40 Frankland Close London SE16 2HD  
1 Benwick Close London SE16 2HE  
12 Benwick Close London SE16 2HE  
2 Benwick Close London SE16 2HE  
10 Benwick Close London SE16 2HE  
11 Benwick Close London SE16 2HE  
Flat 9 Roderick House SE16 2DH  
Flat 1 Antony House SE16 2DJ  
Flat 7 Roderick House SE16 2DH  
Flat 8 Roderick House SE16 2DH  
Flat 10 Antony House SE16 2DJ  
Flat 13 Antony House SE16 2DJ  
Flat 14 Antony House SE16 2DJ

5 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
8 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
9 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
6 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
7 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
22 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
16 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
17 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
14 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
15 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
18 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
20 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
21 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
19 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
2 Thaxted Court Abbeyfield Estate Abbeyfield Road SE16 2BU  
28 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
Flat 73 Bradley House SE16 2DN  
Flat 74 Bradley House SE16 2DN  
Flat 71 Bradley House SE16 2DN  
Flat 72 Bradley House SE16 2DN  
Flat 75 Bradley House SE16 2DN  
Bede House Association Abbeyfield Road SE16 2BS  
1 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
Flat 76 Bradley House SE16 2DN  
Flat 77 Bradley House SE16 2DN  
Flat 70 Bradley House SE16 2DN  
Flat 63 Bradley House SE16 2DN  
Flat 64 Bradley House SE16 2DN  
Flat 61 Bradley House SE16 2DN  
Flat 62 Bradley House SE16 2DN  
Flat 65 Bradley House SE16 2DN  
Flat 68 Bradley House SE16 2DN  
Flat 69 Bradley House SE16 2DN  
Flat 66 Bradley House SE16 2DN  
Flat 67 Bradley House SE16 2DN  
21 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
22 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
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20 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
23 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
26 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
27 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
24 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
25 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
19 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
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18 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
15 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
16 Damory House Abbeyfield Estate Abbeyfield Road SE16 2EZ  
87 Raymouth Road London SE16 2DA

Flat 11 Antony House SE16 2DJ  
Flat 12 Antony House SE16 2DJ  
Flat 6 Roderick House SE16 2DH  
Flat 14 Roderick House SE16 2DH  
Flat 15 Roderick House SE16 2DH  
Flat 12 Roderick House SE16 2DH  
Flat 13 Roderick House SE16 2DH  
Flat 16 Roderick House SE16 2DH  
Flat 4 Roderick House SE16 2DH  
Flat 5 Roderick House SE16 2DH  
Flat 2 Roderick House SE16 2DH  
Flat 3 Roderick House SE16 2DH  
38 Frankland Close London SE16 2HD  
3 Mossington Gardens London SE16 2DZ  
4 Mossington Gardens London SE16 2DZ  
17 Mossington Gardens London SE16 2DZ  
2 Mossington Gardens London SE16 2DZ  
5 Mossington Gardens London SE16 2DZ  
8 Mossington Gardens London SE16 2DZ  
9 Mossington Gardens London SE16 2DZ  
6 Mossington Gardens London SE16 2DZ  
7 Mossington Gardens London SE16 2DZ  
16 Mossington Gardens London SE16 2DZ  
1 Mossington Gardens London SE16 2DZ  
10 Mossington Gardens London SE16 2DZ  
6 Pedworth Gardens London SE16 2DX  
8 Pedworth Gardens London SE16 2DX  
11 Mossington Gardens London SE16 2DZ  
14 Mossington Gardens London SE16 2DZ  
15 Mossington Gardens London SE16 2DZ  
12 Mossington Gardens London SE16 2DZ  
13 Mossington Gardens London SE16 2DZ  
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22 Frankland Close London SE16 2HD  
19 Frankland Close London SE16 2HD  
20 Frankland Close London SE16 2HD  
23 Frankland Close London SE16 2HD  
26 Frankland Close London SE16 2HD  
27 Frankland Close London SE16 2HD  
24 Frankland Close London SE16 2HD  
25 Frankland Close London SE16 2HD  
  
58 Abbeyfield Road London SE16 2BX  
68 Bradley House London SE16 2DN

**Re-consultation: n/a**

## APPENDIX 2

### Consultation responses received

#### Internal services

Ecology Officer  
Environmental Protection Team  
Flood and Drainage Team  
Highways Development Management

#### Statutory and non-statutory organisations

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

#### Neighbours and local groups

None