

<b>Item No.</b> 7.2	<b>Classification:</b> Open	<b>Date:</b> 21 March 2018	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 17/AP/4546 for: Full Planning Application  <b>Address:</b> 180 ILBERTON ROAD, LONDON SE15 1NT  <b>Proposal:</b> Demolition of existing building and erection of a part 5, 8 and 9 storey plus basement mixed-use development (max height 29.98m) comprising 2,351 sqm (GIA) of flexible workspace (Use Class B1) and 84 residential apartments (Use Class C3) with associated amenity space and ancillary infrastructure.  (This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).		
<b>Ward(s) or groups affected:</b>	Livesey		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 20/12/2017		<b>Application Expiry Date</b> 21/03/2018	
<b>Earliest Decision Date</b> 04/02/2018			

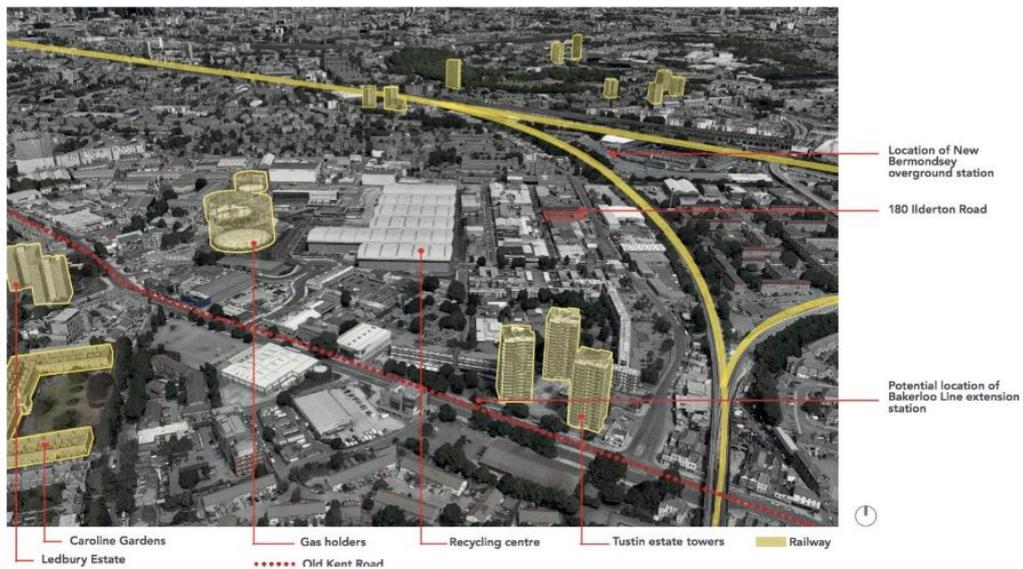
## RECOMMENDATIONS

1. That planning permission be granted, subject to conditions and following the completion of a s106 agreement.
2. In the event that the s106 agreement is not completed 30 September 2018, that the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 96 of this report.

## BACKGROUND INFORMATION

### Site location and description

3. The site is a rectangular shaped plot of land which fronts onto Hatcham Road to the east, Penarth Street to the north and Ilderton Road to the west. It comprises of a two storey brick building formerly used as a coffee packing factory but since 2015 has been used as artists' studios and creative workspaces, managed by V22 as the head tenant who are workspace providers. Entrances to the building are from Penarth Street and Hatcham Road. Servicing is currently taken from Hatcham Road.



- The surrounding area comprises a mix of commercial uses within a range of low rise industrial buildings and yards of a similar scale to the application site. Directly to the south of the site are industrial units of a similar size and scale comprising some light industrial use as well as artists' studios and workshops.



- There are four trees located on the Penarth Street and Hatcham Road frontages. The site is not located within a Conservation Area, nor is it within the setting of a Listed Building.

### Details of proposal

- The proposals involve demolition of the existing commercial building containing

artists' studios and workshop spaces to allow for a mixed use building with employment and residential uses. The employment uses would be provided at basement, ground and first floor levels in the form of workspaces capable of use by small to medium sized enterprises, start up and creative type businesses. There would be a reduction in the employment re-provision when compared to the existing provision as detailed below.

Table - employment provision

	Existing	Proposed	Difference
Class B1 (GIA)	3,328	2,351	-977

7. There would be 84 new residential units. 35% of these (measured by habitable room) would be affordable with 72% social rented and 28% intermediate.
8. The building would rise to a total of five storeys on Penarth Street (north), eight storeys on Hatcham Road (west) and nine storeys along Ilderton Road (east). A podium at first floor level would be provided.



9. Amenity space would be provided in the form of projecting private balconies, communal amenity space and children's play space.
10. The proposal would be car free apart from three accessible blue badge bays which would be introduced on Penarth Street.
11. A commercial service route would be provided along the southern boundary, capable of forming a future service road when the southern neighbouring site comes forward for redevelopment. Servicing for the residential would be from a new loading bay on Penarth Street.
12. Enhancements to the public realm are proposed in the form of new tree planting and widening existing pavements.
13. Additional supporting information was submitted during the course of the application in relation to affordable workspace and a plan for existing businesses to be retained on the site following the redevelopment. Additional viability information was also submitted to support the delivery of 35% affordable housing.

## **Planning history**

14. There is no relevant planning history.
15. Pre-application discussions were held in relation to the proposal under consideration now, the details of which are held electronically by the Local Planning Authority. The main matters discussed were around the employment use, affordable housing, the height and massing, and servicing. No formal response was issued.

## **Planning history of adjoining sites**

At 62 Hatcham Road and 134-140 Ilderton Road

16. 17/AP/3757 Planning application submitted on 29 September 2017 for the demolition of existing buildings and construction of a building up to nine storeys for commercial and residential use. Application under consideration.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

17. The main issues to be considered in respect of this application are:
  - Principle in terms of land use, including consideration of emerging policy for the Old Kent Road Opportunity Area;
  - Environmental impact assessment;
  - Affordable housing;
  - Design issues, including height, scale and massing;
  - Housing mix;
  - Quality of accommodation;
  - Impact upon the amenity of neighbouring residential occupiers and the surrounding area;
  - Transport issues;
  - Impact on trees;
  - Planning obligations (Section 106 Undertaking or Agreement);
  - Sustainable development implications;
  - Other matters.

### **Planning policy**

18. The application site is found within the following Local Plan designations:
  - Old Kent Road Preferred Industrial Location -Strategic
  - Old Kent Road Action Area
  - Urban density zone
  - Archaeological priority zone
  - Air quality management area.

National Planning Policy Framework (the Framework)

19. Section 1 - Building a strong, competitive economy  
Section 4 - Promoting sustainable transport  
Section 6 - Delivering a wide choice of high quality homes  
Section 7 - Requiring good design  
Section 8 - Promoting healthy communities

Section 10 - Meeting the challenge of climate change, flooding and coastal change  
Section 11 - Conserving and enhancing the natural environment  
Section 12 - Conserving and enhancing the historic environment

National Planning Policy Guidance (2014)

The London Plan 2016

20. Policy 2.17 Strategic Industrial locations  
Policy 3.3 Increasing housing supply  
Policy 3.5 Quality and design of housing developments  
Policy 3.6 Children and young people's play and informal recreation facilities  
Policy 3.8 Housing choice  
Policy 3.9 Mixed and balanced communities  
Policy 3.10 Definition of affordable housing  
Policy 3.11 Affordable housing targets  
Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes  
Policy 3.13 Affordable housing thresholds  
Policy 4.3 Mixed use development and offices  
Policy 4.4 Managing industrial land and premises  
Policy 5.7 Renewable energy  
Policy 5.8 Innovative energy technologies  
Policy 5.11 Green roofs and development site environs  
Policy 5.12 Flood risk management  
Policy 5.13 Sustainable drainage  
Policy 5.21 Contaminated land  
Policy 6.9 Cycling  
Policy 6.10 Walking  
Policy 6.13 Parking  
Policy 7.2 An inclusive environment  
Policy 7.3 Designing out crime  
Policy 7.4 Local character  
Policy 7.6 Architecture  
Policy 7.8 Heritage assets and archaeology  
Policy 7.21 Trees and woodlands  
Policy 8.2 Planning obligations  
Policy 8.3 Community infrastructure levy

Core Strategy 2011

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

Southwark Plan 2007 (July) - saved policies

22. The council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF,

considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

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

#### Supplementary Planning Documents

- 23. Sustainable design and construction SPD (2009)
- Sustainability assessments SPD (2009)
- Sustainable Transport SPD (2010)
- Affordable housing SPD (2008 - Adopted and 2011 - Draft)
- Residential Design Standards SPD (2011 and 2015)
- Section 106 Planning Obligations and Community Infrastructure Levy (2015)
- Development Viability SPD (2016)

#### Old Kent Road Area Action Plan (OKR AAP)

- 24. The OKR AAP will guide and manage new development and growth in the area over the next 20 years. The preparation of this plan has also reached the 'Preferred Option' stage, and the Council is currently consulting on a set of new and amended policies until 21 March 2018. Adoption of the plan is expected in late 2018. As the document is still in draft form, it can only be attributed limited weight.

#### New Southwark Plan

- 25. Work is under way to prepare a New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark plan and the 2011 Core Strategy. The Council has just concluded consultation on the submission version of the NSP. It is

anticipated that the plan will be adopted later in 2018 following an Examination in Public (EIP). Similarly with the OKR AAP, as the NSP is in draft form, it can only be attributed limited weight.

#### Draft New London Plan

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

#### **Principle of development**

27. The site is located in the preferred industrial location-strategic (SPIL) which is an industrial location of strategic importance as identified in the Core Strategy and the London Plan. Introducing housing here would therefore represent a departure from the adopted Southwark and London Plan. The proposal also involves the loss of 977sqm of existing commercial floorspace, which would be contrary to strategic policy 10 of the Core Strategy and saved policy 1.2 of the Southwark Plan. Saved policy 5 is also relevant which encourages provision and replacement of small business units.
28. Strategic policy 10 of the Core Strategy states that the SPIL will be protected for industrial and warehousing uses. The Core Strategy does however, recognise that structural changes in the economy are resulting in a declining need for industrial land in London. The Core Strategy also recognises that diversifying the range of job opportunities in the industrial locations into new sectors would benefit local people. Further, it sets out the future direction of Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP).
29. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in SPILs are B class uses and other sui generis uses which are inappropriate in residential areas.
30. London Plan policy 2.17 seeks to promote, manage and where appropriate, protect the Strategic Industrial Land as London's main reservoir of industrial and related capacity, which includes general and light industrial uses. It states that development on Strategic Industrial Land should be refused unless they provide for broad industrial type activities, are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework, meet the needs of small to medium sized enterprises or provide for small scale 'walk to' services for industrial occupiers such as workplace crèches or cafes.
31. The London Plan designates the Old Kent Road as an opportunity area, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. It identifies the potential for residential-led development along the Old Kent Road corridor, with homes and jobs targets to be explored and further refined through the preparation of a planning framework and a review of the Old Kent Road Strategic Industrial Location.

#### The Old Kent Road Area Action Plan (OKR AAP)

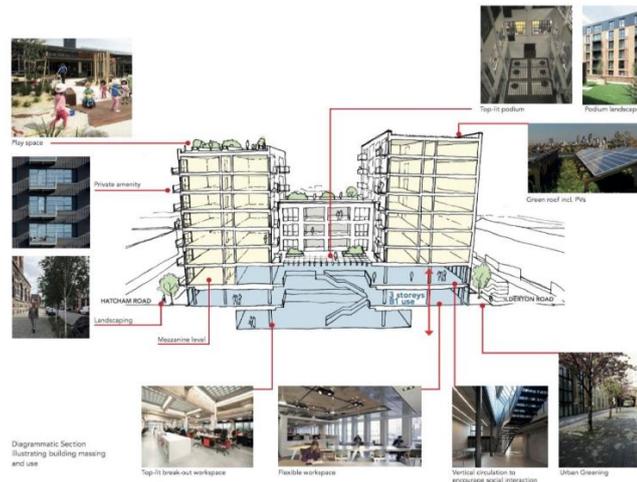
32. The emerging OKR AAP seeks to provide for much larger growth than that indicated by the London Plan and sets targets of a total of 20,000 new homes and 10,000 new jobs as well as new infrastructure, including parks and schools. It proposes the release of a substantial part of the Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods, so that new and existing businesses

are designed to co-exist with new homes.

33. The OKR AAP places the site within the proposed action area core, and within proposal site OKR 16 which covers the Hatcham Road and Ilderton Road area.
34. Emerging policy AAP6 of the OKR AAP states that development must retain or increase the amount of B Class floorspace on site, accommodate existing businesses on site or in the wider Old Kent Road Opportunity Area or provide relocation options for businesses that would be displaced by redevelopment and result in an increase in the number of jobs provided. It also requires the workspace to be managed by a specialist provider and for an element of affordable workspace to be provided.
35. Paragraph 216 of the NPPF states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The New Southwark Plan and Old Kent Road Area Action Plan have been subject to extensive consultation however they have yet to be subject to a independent examination and therefore the documents have some weight but they are not yet adopted policy. They do however, provide an indication of the direction of travel for planning policy in the opportunity area.
36. In determining whether the principle of the proposed development would be acceptable in land use terms, specifically the introduction of housing in the SPIL and the loss of 977sqm of existing employment floorspace, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused, and whether those benefits would therefore justify a departure from the adopted planning policy. Officers consider that the key benefits arising from the proposal would be as follows.

#### Job creation

37. The existing building is considered to provide poor quality accommodation for artists' studios and creative type users. Owing to the subdivision of the floorspace, much of it has no natural daylight, and suffers from water ingress and sub optimal levels of heating. The existing building provides for around 110 full time jobs. By comparison, the new development could support a higher number of jobs estimated at around 154 jobs based on employment densities of 1 job per 13sqm (NIA). The new workspaces would meet the needs of the SME and emerging creative sectors. This is a positive aspect of the proposal.
38. To mitigate the loss of B class floorspace which would arise, a contribution of £27,469 would be required towards skills and employment programmes in the borough, which in turn would help residents into employment. This has been calculated in accordance with the Council's Planning Obligations and CIL SPD and would be secured through the s106 agreement.



### Business relocation and retention

39. In this case, the applicant is a contractual purchaser of the site and accordingly does not have any legal capacity to deal directly with the sub tenants, who are instead managed by V22 as the head lessee. Despite, this, the applicant have committed to working with V22 to assist in finding the existing businesses suitable premises elsewhere. The applicant also owns a limited amount of space in the nearby Penarth Centre on Penarth Street which is soon to become vacant and can be made available to existing tenants which is welcomed. Businesses will be offered space back following completion of the development which is also welcomed and supported. Further details of the relocation and retention strategy will be secured by the legal agreement.

### Affordable workspace

40. The applicant has agreed to provide an element of affordable workspace within the scheme comprising of 10% of the floorspace at rents of £12 per sq ft over a 15 year period. The rents would be subject to inflation over this time. The level of rent would make the space very affordable to artists and creative businesses and the space would be offered to existing businesses first, as part of the business retention plan described above.

### Specialist workspace provider

41. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. The applicant has committed to secure a creative workspace provider such as V22 which currently manages the existing space. This can be secured through a section 106 planning obligation.

### Provision of housing, including affordable housing

42. The scheme would provide 84 new residential units, including policy compliant affordable housing comprising social rented and intermediate units. There is a pressing need for housing in the borough. Policy 3.3 of the London Plan supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015-2025. This is reinforced through Strategic Policy 5 of the Core Strategy which requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. It would also be in accordance with emerging policy

for the Old Kent Road Opportunity Area and the expectation of significant new housing provision.

#### Impact of the proposed residential use

43. Concern has been raised from an adjoining business that the introduction of housing here could restrict and prejudice the operation of existing businesses in the area. The type of businesses that operate in the Hatcham Road area is changing and many of the historical manufacturing businesses have moved out. The area today increasingly comprises start up businesses, artists and small scale makers. Given the changing nature of the uses now carried out, it is not felt that these businesses would be prejudiced and they could continue to operate and co-exist with the introduction of new residential uses. In addition the developer will provide a new off street servicing route that should ensure that both this site and its neighbours can accommodate a wide range of commercial users in the future without harming residential amenity or prejudicing those commercial uses. This is a key requirement of the draft masterplan and its provision is welcomed. Conditions are recommended in relation to noise and sound insulation within the building, and also in relation to servicing hours.

#### Conclusion on land use

44. To conclude in relation to land uses, the proposed development would be contrary to strategic policy 10 of the Core Strategy owing to the loss of B class floorspace when compared to the existing provision, and the introduction of residential into the SPIL would represent a departure from the adopted development plan. This must therefore be weighed against the benefits of the scheme including job creation, business retention, delivery of affordable workspace, the provision of housing, of which 35% would be affordable, and the provision of good quality, flexible commercial space. Some weight can be attached to the NSP and OKR AAP at present, given that they have been subject of extensive consultation and the emerging policies would support the proposal. The loss of B class floorspace in this specific instance could therefore be justified and mitigated through a s106 contribution. Given the changing character of the area, it is not felt that the introduction of housing would prejudice the operation of existing businesses in the area. In light of this officers consider that the principle of the proposed development in land use terms should be supported.

#### **Environmental impact assessment**

45. The applicant made a screening request to determine whether an Environmental Impact Assessment (EIA) is required in respect of the proposed development. A formal screening opinion was issued on 21 November 2017 confirming that the proposed development did not constitute EIA development and accordingly does not need to be supported by an Environmental Statement.

#### **Affordable housing**

46. Strategic Policy 6 of the Core Strategy 'Homes for People on Different Incomes' requires at least 35% of the residential units to be affordable. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms and further information on this can be found in the Council's draft Affordable Housing SPD (2011). All of the affordable units should be provided on site and a mix of housing types and sizes is required. In accordance with Saved Policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required.

47. Saved Policy 4.4 of the Southwark Plan requires a tenure split of 70% social rented to 30% intermediate housing. This is reiterated in the draft OKR AAP.
48. In total, 252 habitable rooms would be provided in the development. The development would provide a total of 89 affordable habitable rooms which would equate to an overall provision of 35%. The level of provision is therefore acceptable and policy compliant. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
49. With regard to tenure split, out of the 89 affordable habitable rooms, 64 would be social rented (72%) and 25 would be intermediate shared ownership (28%). This is slightly out from the 70% social rented and 30% intermediate split required but it is in the favour of social rented which is welcomed.

Table: Affordable housing

<b>Units</b>	<b>Social rented</b>	<b>Intermediate (shared ownership)</b>	<b>Total</b>
<b>1 bed</b>	2	2	4
<b>2 bed</b>	6	2	8
<b>3 bed</b>	8	3	11
<b>Total</b>	16	7	23

50. The proposal would provide a total of 23 affordable units in a mix of unit sizes, including larger number social rented family sized units (8), which is a positive aspect of the scheme. A section 106 agreement is recommended to secure the delivery of these units, including a clause preventing more than 50% of the private units from being occupied until the affordable units have been completed.

### **Design issues, including height, scale and massing**

51. Strategic Policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to "achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in". Saved Policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments which includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
52. The emerging policy in the AAP sets out a vision for the Old Kent Road that would see substantial change in the area over the next twenty years, whilst seeking design that responds well to its existing character and sense of place. There are no conservation areas or listed buildings in the vicinity of the application site. The draft AAP does however identify buildings of townscape merit and architectural or historic interest around the site. None would be harmed by these proposals. Given the height proposed, it is not considered that this proposal would result in any harm to designated London wide or local protected views.

### Height, scale and massing

53. The height, scale and massing proposed is in line with the emerging policy set out in the draft AAP. At its highest point, the development under consideration here would be 29.98m high, comprising of five storeys on Penarth Street (north), eight storeys on Hatcham Road (west) and nine storeys along Ilderton Road (east). This dynamic

massing proposal responds well to both the existing context, and potential future development around the site, as illustrated in the draft OKR AAP. It also allows for the podium level amenity space to be well naturally lit.



54. The footways around the building would be widened and eight new street trees would be planted (plus the retention of two existing street trees). This would create a comfortable setting for a building of this height, particularly where it is at its tallest, fronting onto Ilderton Road.

#### Design quality

55. The design proposed is of a high quality that responds well to the character of the surrounding context. The architectural language is inspired by post war warehouse buildings, resulting in an attractive, well proportioned simplicity driven by the structural grid of the building. The windows would be Crittall style windows, well in keeping with the aesthetic proposed. Windows of this nature are common in buildings around the application site. The rational, repetitive rhythm of the windows, and the depth of the window reveals further contribute to the industrial aesthetic.
56. Within this simple articulation, the building would have a clear, but subtly differentiated hierarchy of 'base', 'middle' and 'top'. This ensures comfortable proportions and a clear articulation of the mix of uses proposed. The 'base' would ground the building at the back edge of the footway, with the extent of the workspace denoted by a continuous brick band at mezzanine level. The 'middle' would feature a clear rhythm windows and balconies, broken up by recessed vertical bays, highlighted with a slightly darker colour metal. The 'top' would be expressed with a simple coping stone. The corner piers would be wider than typical piers elsewhere in the building, to provide a sense of solidity and to ground the building.



## Materials

57. A masonry language is proposed for the building, in response to the character of the surrounding area. This would consist predominantly of a mid grey coloured brick, with reconstituted stone cills and copings. The protruding balconies would be enclosed by metal railings. These materials, along with the details described above are considered an appropriate response to the existing character of the area and the emerging architectural language proposed in the draft OKR AAP. Detailed drawings and material samples should be required by condition in order to ensure that this quality of design is delivered.



## Conclusion on design

58. The building would be of an appropriate height and scale and accordingly considered acceptable. The design quality, and use of brick and Crittall style windows would ensure that a high quality of finish would be achieved. Conditions are recommended

in relation to detailed design and material samples.

### Housing mix

59. Strategic Policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% 2+ bedroom units and 20% 3+ bedroom units. No more than 5% studio units can be provided and these can only be for private housing. At least 10% of the units should be suitable for wheelchair users.

Table 2: Unit mix

	<b>Total number units (number)</b>	<b>Total Units (%)</b>
<b>Studios</b>	1	1.2%
<b>1 bed</b>	32	38.1%
<b>2 bed</b>	34	40.5%
<b>3 bed</b>	17	20.2%
<b>Total units</b>	84	100%

60. 60.7% of units would have two or more bedrooms; this meets the 60% target and is therefore acceptable. 20.2% of the units would have three or more bedrooms, which marginally exceeds the 20% minimum. The numbers of studios proposed is 1.2% which is well within the maximum allowed. Eight wheelchair units (10%) would be provided. These wheelchair units would be provided in the social, intermediate and private tenures in a range of unit sizes. This is considered acceptable and appropriate. The social rented and intermediate units would be required to be fully fitted for first occupation, with private units being adaptable. In summary the housing mix would be in accordance the relevant policy.

### Density

61. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site is located within the Urban Zone, a density range of 200 to 700 habitable rooms per hectare would be sought. Appendix 2 of the Saved Southwark Plan sets out guidance for how density should be calculated. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
62. The development as a whole would have a density of 1,786 habitable rooms per hectare. Since the maximum upper limit of 700hrh would be significantly exceeded, the development would need to demonstrate that it would be excellent in relation to housing quality. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on amenity to existing occupiers is acceptable, then it is considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission. This is considered in the following paragraphs.

## **Quality of accommodation**

63. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 and include guidance on overlooking standards as well as requiring the predominance of dual aspect accommodation.

### Aspect

64. 64% of the proposed units would be dual aspect with no north facing units. All of the three bed units would also have a dual aspect. A clear majority of the units would therefore be dual aspect which is supported.

### Unit sizes

65. All of the proposed units would satisfy the minimum floor areas set out in Southwark's Residential Design Standards SPD and accordingly this aspect of the scheme is also policy compliant.

### Internal daylight within the proposed dwellings

66. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.
67. There are 17 rooms out of the whole development which do not achieve full compliance with the BRE. However this represents a small proportion out of the 254 overall rooms (7%). The areas of non compliance are on the lower floors of the proposed development. All rooms from 3<sup>rd</sup> floor up would all be fully compliant. This is considered acceptable.

### Overlooking

68. There would be some opportunities for overlooking between habitable windows of differing residential units within the Hatcham Road and Ilderton Road blocks, however they would be separated by the podium amenity space which is 19m wide and is considered to avoid any harmful overlooking.

### Amenity and play space

69. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space (covering a range of age groups). The emerging OKR AAP requires 5sqm of public open space per dwelling as per AAP 10.

70. The following amount of amenity space would need to be provided:

- For units containing 3 or more bedrooms, 10sqm of private amenity space as

- required by the SPD;
- For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
  - 50sqm communal amenity space per block as required by the SPD;
  - 10sqm of children's play space for every child space in the development as required by the London Plan;
  - 5sqm of public open space per dwelling as required by the OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

#### Private amenity space

71. All flats, including the studio unit, have been provided with private amenity space in the form of balconies, which is a positive benefit of the scheme. The three bed flats would be provided with 10sqm or more.

#### Communal amenity space

72. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. In this case, a total of 202sqm of communal space would need to be found. Combined with the 50sqm required per block, a total of 252sqm of communal amenity space would be required. Combined, the roof terrace areas would achieve the 50sqm minimum as well as making up the shortfall in private amenity space. This aspect is therefore acceptable.

#### Children's amenity space

73. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG the development would be required to provide 243sqm of children's play space. An area of playspace has been provided on the roof of the Hatcham Road block which meets this requirement and an indicative playspace layout has also been provided, further details of which can be secured by condition.

#### Public open space

74. Policy AAP10 of the emerging OKR AAP requires the provision of 5sqm of public open space per dwelling. As it is not feasible to provide this on site then a financial contribution would be required. Although this policy currently has limited weight, the applicant has agreed to make the contribution of £86,100 based on the 84 dwellings proposed (at a cost of £205 per sqm as set out in the section 106 SPD) which could go towards off site delivery, and can be secured by the legal agreement.

#### Noise

75. The site is located within the SPIL, and the proposed residential units would adjoin existing commercial units to the immediate south at 40-50 Hatcham Road and 188-196 Ilderton Road which is occupied as showroom and studio space. An environmental noise assessment has therefore been undertaken to assess whether the site would be suitable for residential development. The report has been reviewed by the Council's Environmental Protection Team (EPT) and a condition to secure appropriate internal noise levels is recommended, which should minimise the likelihood of noise complaints against the existing industrial occupiers. This should be capable of being achieved with robust glazing.

#### Conclusion on quality of accommodation

76. The proposed development would provide well lit and well ventilated homes that meet the space requirements of the Residential Design Standards. Sufficient private, shared communal and children's play space has been provided meeting the minimum requirements. The quality of accommodation is therefore considered to justify the high density of the scheme. Section 106 payments have been secured for public open space which can go towards the delivery of open space elsewhere since it is not possible to provide this on site.

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

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

#### Daylight and sunlight

78. There are no neighbouring residential units that have the potential to be impacted by daylight and sunlight. The surrounding uses comprises of commercial occupiers only.

#### Cumulative daylight and sunlight analysis

79. An assessment has however been carried out considering the future redevelopment potential of neighbouring sites. Indicative massing proposals have been prepared to understand any potential daylight impacts to future residential units on these neighbouring sites and whether they would have access to a reasonable standard of daylight and sunlight if the development under consideration here were to be fully built out. This has been carried out using the ADF analysis. The indicative massing proposals of these neighbouring sites take the similar form to that proposed here which is two levels of commercial space at ground and first floor level with residential units above. The analysis of these potential cumulative schemes demonstrates that the proposal would not prevent any of the neighbouring blocks from successfully bringing forward residential schemes as the majority of those habitable windows would achieve reasonable standards of daylight and sunlight. The indicative massing analysis does indicate that the sites to the immediate south at 40-50 Hatcham Road and 188-196 & 202 Ilderton Road would need to incorporate a greater set back from the shared boundary in order to allow more daylight through, however this issue can be considered more fully when pre-application proposals for the site come forward. The form and massing of the proposal is therefore considered acceptable and appropriate and would allow neighbouring sites to successfully deliver good quality accommodation.

#### Overlooking

80. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. These distances are all met in terms of the impact of the proposal on adjacent buildings.

81. If the sites to the immediate south of the site at 40-50 Hatcham Road and 188-196 Ilderton Road were to come forward for redevelopment, there could be a close distance of around 6m between the habitable room windows of the units within the separate sites. This would fall well short of the required 21m. As mitigation, the main habitable room windows of living rooms proposed here have been orientated to face away from this side, with the other rooms comprising of bedrooms only. It is however considered appropriate to attach a condition requiring these windows to be obscure glazed and fixed shut to a height of 1.8m which would address any harmful overlooking that may arise.

#### Air quality

82. The site is located in an air quality management area and an air quality assessment has been submitted, which considers the air quality impacts arising from the construction and use of the development.
83. The council's environmental protection team (EPT) has reviewed the submission and advised that they will require the emissions during the construction phase to be controlled by measures contained within a Construction Management Plan. Such a plan should detail details of continuous monitoring for dust and noise. It is recommended that this plan be requested by condition.

#### **Transport issues**

84. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 requires that the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards.

#### Accessibility

85. The site has a PTAL (public transport accessibility level) of 2 (moderate) and is not located in a controlled parking zone (CPZ). It is within 500m south of South Bermondsey Railway Station. The site is close to Quietway 1 which provides a good quality cycle link to Waterloo. The nearest bus stop is located to the east on Ilderton Road.

#### Servicing

86. A new one-way servicing access would be provided from Hatcham Road for the employment use. This would allow vehicles of up to 7.5 tonnes lorries to reverse in and exit in a forward gear, thereby taking servicing off the highway which is welcomed and supported. There is potential for this service route to be widened to become two way when the adjacent southern sites come forward for development. Access would not currently be permitted through to Ilderton Road to avoid any conflict with the existing bus stop, however, there is potential for this stop to be relocated in the future. Loading for the residential use would be from a new loading bay to be provided on Penarth Street because of available on street capacity, the detailed design of which can be secured by legal agreement.



### Construction management

90. In order to ensure that increases in traffic, noise and dust associated with the construction phase of the development are minimised, a construction management plan is requested by condition.

### **Impact on trees**

91. Saved policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
92. The proposal would involve the removal of two existing street trees in order to facilitate the development. Eight new trees would be planted which represents a net gain in tree cover which is welcomed and supported. The existing pavement would be widened to accommodate the new tree planting which can be secured by a s.278 agreement.

### **Planning obligations (S.106 undertaking or agreement)**

93. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

94. The application would be supported by the following s106 obligations:

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171	Agreed
Affordable housing monitoring	£11,500	Agreed
Carbon Offset – Green Fund	£109,956	Agreed
Delivery and service bond	£8,900	Agreed
Loss of employment	£27,469	Agreed
Public open space	£86,100	Agreed
Transport for London Buses	£55,285	Agreed
Transport for London Legible signage	£12,000	Not agreed
Transport for London Healthy Streets	£84,000	Not agreed
Admin fee	2%	Agreed

95. In addition to the financial contributions set out above, the following other provisions would be secured:

- Affordable housing provisions
- Wheelchair housing provisions
- Appointment of workspace co-ordinator
- Affordable workspace – 10% of floorspace
- Terms for the affordable workspace –£12 per sq ft, over a 15 year period

- Retention of existing occupiers business plan
- Construction phase jobs
- Highway works – s278 for parking bays, highway works including disabled and loading bay provision and tree planting
- Delivery of service route
- Dockless cycle hire for 3 years
- Car club membership for 3 years
- Connection to a future district heating system

96. In the event that an agreement has not been completed by 30 September 2018, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

*In the absence of a signed S106 legal agreement there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to 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 Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).*

#### Mayoral and Southwark Community Infrastructure Levy (CIL)

97. 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.
98. In this instance a Mayoral CIL payment of £314,011 and a Southwark CIL payment of £1,224,171 would be required. These are pre-social housing relief figures and accordingly would be reduced when the CIL Social Housing Relief claim is submitted after the grant of planning permission.

#### **Sustainable development implications**

99. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor’s energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 40% reduction against part L of the Building Regulations. An Energy statement and Sustainability Assessment based on the Mayor’s hierarchy have been submitted.

#### Be lean (use less energy)

100. Energy efficient measures included in the strategy are high efficiency glazing and energy efficient lighting using LED lamp technology and a reduced air permeability rate.

#### Be clean (supply energy efficiently)

101. A combined heat and power plant (CHP) would be provided to reduce the carbon

dioxide savings further.

102. The building would be future-proofed for connection to a future district heating system which would be secured through the S106 agreement.

#### Be green (low or carbon zero energy)

103. A range of low or zero carbon technologies was considered and photo voltaic panels (PVs) were found to be most suitable for this scheme. The PVs proposed would reduce carbon emissions by 5%; this would fall short of the 20% Core Strategy target for Strategic Policy 13 of the Core Strategy.
104. The 'be lean', 'be clean' and 'be green' measures would result in an overall reduction of 34% in carbon dioxide emissions when compared to a scheme compliant with the building regulations. For the residential element, a 44% carbon reduction would be achieved falling short of the zero carbon requirements as set out in policy 5.2 of the London Plan, amounting to a 52.8 tonne shortfall. For the commercial element, a 24% reduction in carbon emissions would be achieved, falling short of the 40% target against Part L of the Building Regulations, amounting to a 8.2 tonne shortfall.
105. Recognising that both the residential and commercial aspects fall below the policy requirements in relation to carbon savings, a contribution towards the council's carbon offset fund would be required. Calculated on the basis of £1,800 per tonne, the residential component would generate a contribution of £95,173 and the commercial component a contribution of £14,783 (total £109,956). The applicant has agreed to make the contribution of £109,956 to the carbon off set fund which would therefore make this aspect of the scheme fully policy compliant.

#### BREEAM

106. Strategic policy 13 of the Core Strategy requires the commercial units to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken which demonstrates that an "excellent" standard can be achieved which meets the policy requirement and is therefore acceptable. A condition to secure this is therefore recommended.

#### Ecology

107. The applicant has submitted a Preliminary Bat Roost Assessment which has been reviewed by the council's Ecologist. The assessment indicates that there would be no adverse impact to bats. A condition is recommended to secure details of bird and bat boxes. A green roof is proposed on one area of flat roof which would provide some biodiversity and sustainability benefits and accordingly is welcomed.

#### **Other matters**

##### Flood risk and water resources

108. The application site is located within Flood Zone 3, which is considered to be 'High Risk' but does benefit from the Thames tidal defences. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable subject to the attachment of conditions being attached to any grant of planning permission.

## Archaeology

109. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ) designed to protect the palaeoecological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large late glacial Bermondsey Lake and the associated riverine geology and topology.
110. An archaeological desk-based assessment has been submitted with the application, which has been reviewed by the council's archaeologist. As the proposal includes a basement in its design, a series of archaeological conditions are recommended in relation to securing a programme of archaeological evaluation, mitigation and reporting.

## **Conclusion on planning issues**

111. The proposed development would result in a loss of B class floorspace, and the introduction of residential uses in to the SPIL would represent a departure from the adopted development plan. The draft New Southwark Plan and Old Kent Road Area Action Plan do however, provide an indication of the direction of travel for planning policy in the area specifically involving the site to released from its SPIL designation and the expectation of mixed use neighbourhoods and significant levels of new housing. Although the proposal would result in a loss of B class floorspace, it is in a poor state of repair. The proposed development would increase the numbers of jobs on the site and deliver new housing, including a policy compliant level of affordable housing. Affordable workspace has been proposed and there are further benefits in terms of business retention which can be secured by the legal agreement. Recognising the changing character and uses carried out in the immediate area, it is not felt that any harm to existing businesses would arise by the introduction of housing. In light of this it is considered that the principle of the proposed development should be supported in this instance.
112. The proposal would deliver a good standard of accommodation and would comply with the standards as set out in the residential design standards adopted by the council in relation to unit mix, unit size, dual aspect and wheelchair housing. The provision of affordable housing, measured at 35% of habitable rooms would be fully policy compliant and a positive aspect of the proposals.
113. The height and massing of the building would respond well to the character of the surrounding context and the architectural language, inspired by post war warehouse buildings would result in an attractive building. An analysis has been carried out to consider the future redevelopment potential of neighbouring sites and it is felt that these sites could successfully come forward if this scheme were to be fully built out.
114. It is therefore recommended that planning permission be granted subject to conditions and the completion of a legal agreement under the terms as set out above.

## **Community impact statement**

115. Details of consultation undertaken by the applicant on the proposed development prior to submission of the planning application have been provided. Letters were sent to 930 local residents and businesses detailing the proposals with contact details and an offer to meet with residents and businesses to discuss the scheme. Ward members were also notified of the scheme.

## **Consultations**

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

## **Consultation replies**

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

### Summary of consultation responses

118. Following neighbour consultation, three objections have been received, the main points of which have been summarised and addressed below.

119. Objection: Loss of long standing community.

Officer response: The new homes would support the existing communities and businesses.

120. Objection: This part of the borough is not designated for residential accommodation.

Officer response: Whilst the site is located within the SPIL, emerging policies recognise that this will change in the future and that mixed use developments, including residential could be supported.

121. Objection: Construction impacts would be disruptive.

Officer response: These would be minimised as far as possible; a construction management plan would be requested by condition.

122. Objection: Rights to light impacts to Penarth Centre.

Officer response: Rights to light are a common law matter and not a material planning consideration.

123. Objection: Overshadowing to the photovoltaic panels located on the roof of the Penarth Centre.

Officer response: It is unlikely that the development, which rises to a maximum of 9 storeys would overshadow the roof of the Penarth Centre which is located to the north west of the site.

124. Objection: The council's Sustainable Design and Construction SPD states that new developments should aim to meet the Code for Sustainable Homes Level 4, which is unlikely to be met without some low and zero carbon technologies.

Officer response: The proposed development falls short of meeting the carbon targets and accordingly a contribution to the carbon off set fund has been agreed.

125. Objection: The residential use will be incompatible with the existing industrial and manufacturing operations of the area.

Officer response: Owing to the changing character of the existing business uses, it is felt that they could successfully co-exist with the new residential accommodation.

126. Objection: The proposed design offers none of the benefits and practicality of the existing warehouses. Recommend live/work units are provided instead for keyworkers/artists/makers.

Officer response: The proposed commercial spaces would be flexible and capable of being used by a range of occupiers and businesses.

127. Objection: The residential units should be orientated to face the inside of the

buildings, with workspaces on the outside elevations. Residential street facing balconies are incompatible with the noise/dust/traffic produced by existing businesses.

Officer response: Practically, this would be very difficult to achieve given the limited size of the site.

128. Objection: The private residential terrace could deliver some renewable energy.  
Officer response: Photovoltaic panels have been proposed on the roof of the Ilderton Road block. The private terrace provides meaningful amenity space for the residents.
129. Objection: The noise survey was undertaken on a single day and should have been undertaken at different times such as Sundays, Friday and Saturday nights and weekday mornings.  
Officer response: The noise report was reviewed by the council's environmental protection team who have raised no concerns. The survey was undertaken on a weekday when noise levels would be expected to be at their highest.
130. Objection: The proposal should be delivering more affordable housing.  
Officer response: The proposal delivers a policy compliant level of affordable housing. The viability has been assessed and reviewed by independent consultants who have agreed that the level of affordable housing is the maximum that the scheme can support.
131. Objection: The daylight and sunlight analysis illustrates a potential development of 4-5 storeys at the immediately adjoining site to the south at 40-50 Hatcham Road and 188-196 & 202 Ilderton Road compared with 8-9 storeys at the application site. This is an inequitable distribution of development mass and quantum. More analysis should be prepared showing a more comparable scale of development.  
Officer response: It is felt that reasonable assumptions have been made in relation to the scale of any future developments and in any case, these assumptions would not preclude the adjoining site from achieving a greater mass and quantum.
132. Objection: Windows should be omitted from the south facing windows within the scheme or, at least be confined to secondary windows in order to protect against overlooking and a loss of privacy for any future scheme to come forward.  
Officer response: It is felt that windows can exist along this boundary with the main habitable windows would not face onto this side. A condition has however been attached requiring these to be obscure glazed and fixed shut.
133. Objection: The submitted daylight and sunlight analysis includes a number of discrepancies within the application drawings which should be corrected.  
Officer response: This issue is currently being looked into and an update will be reported in the addendum.
134. Objection: The submitted Townscape and Visual Impact Assessment should consider more fully the cumulative effects of the area's developments.  
Officer response: The assessment has been prepared considering the impact of the proposed scheme since that is the scheme currently under consideration.

#### Summary of responses from external and statutory consultees

##### Metropolitan Police

135. Recommend a secured by design condition be attached to any grant of planning permission.

London Underground

136. No comment.

Thames Water

137. No objection.

Environment Agency

138. No objection subject to conditions.

Transport for London

139. Request contributions of £84,000 towards the Healthy Streets scheme to go towards the cost of the Ilderton Road/Old Kent Road junction and/or the section immediately to the north west. Request £12,000 towards wayfinding for the cost of two Legible London signs. Request £55,285 towards buses.

140. In addition, request adoption of wider footways, outward opening doors to be changed to inward, request that the council secure funding to address any inadequacies of the surrounding pedestrian walking environment, require additional cycle parking to be provided with adequate dimensions in between spaces. Welcome car free nature of scheme and a revised Delivery and Service plan to include data assumptions.

**Human rights implications**

141. 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.

142. This application has the legitimate aim of providing a new building with employment and residential uses. 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**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Site history file: TP/2327-190 Application file: 17/AP/4546 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5513 Council website: www.southwark.gov.uk

## 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>	Kiran Chauhan, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	9 March 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>		9 March 2018

# APPENDIX 1

## Consultation undertaken

**Site notice date:** 12/01/2018

**Press notice date:** 04/01/2018

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

**Neighbour consultation letters sent:** 04/01/2018

### Internal services consulted:

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

### Statutory and non-statutory organisations consulted:

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

### Neighbour and local groups consulted:

132-136 Ormside Street London SE15 1TF	21 Hatcham Road London SE15 1TW
International Secretariat 215 Ilderton Road SE15 1NS	Unit 29 The Penarth Centre SE15 1TR
18 Manor Grove London SE15 1SX	First Floor Flat 209 Ilderton Road SE15 1NS
221 Ilderton Road London SE15 1NS	Second Floor Flat 209 Ilderton Road SE15 1NS
Southwark Integrated Waste Management Facility 43 Devon Street SE15 1AL	Flat A 209 Ilderton Road SE15 1NS
152-154 Ilderton Road London SE15 1NT	Ground Floor 145 Ormside Street SE15 1TF
127-135 Ormside Street London SE15 1TF	First Floor 145 Ormside Street SE15 1TF
Unit 3a Canterbury Industrial Park SE15 1NP	Unit 3b Canterbury Industrial Park SE15 1NW
137 Ormside Street London SE15 1TF	First Floor Rear 180 Ilderton Road SE15 1NT
212 Ilderton Road London SE15 1NT	Flat A 219 Ilderton Road SE15 1NS
202 Ilderton Road London SE15 1NT	Ground Floor 180 Ilderton Road SE15 1NT
Asaholah Salvation Church Of God 137a Ormside Street SE15 1TF	Part First Floor Front 180 Ilderton Road SE15 1NT
24 Manor Grove London SE15 1SX	Flat 3 211 Ilderton Road SE15 1NS
145 Ormside Street London SE15 1TF	8 Manor Grove London SE15 1SX
River Of Life Pentecostal Church 12-38 Hatcham Road SE15 1TW	Unit 7 The Penarth Centre SE15 1TR
214 Ilderton Road London SE15 1NT	Units 9 And 10 The Penarth Centre SE15 1TR
217 Ilderton Road London SE15 1NS	12 Manor Grove London SE15 1SX
140 Ilderton Road London SE15 1NT	141 Ormside Street London SE15 1TF
	143 Ormside Street London SE15 1TF

180 Ilderton Road London SE15 1NT  
Unit 2 Canterbury Industrial Park SE15 1NP  
223-225 Ilderton Road London SE15 1NS  
206-210 Ilderton Road London SE15 1NT  
60 Hatcham Road London SE15 1TW  
148-150 Ilderton Road London SE15 1NT  
182-196 Ilderton Road London SE15 1NT  
139 Ormside Street London SE15 1TF  
Unit 11 The Penarth Centre SE15 1TR  
Unit 12 The Penarth Centre SE15 1TR  
Unit 13 The Penarth Centre SE15 1TR  
Penarth Works Penarth Street SE15 1TR  
Unit 8 The Penarth Centre SE15 1TR  
Unit 23 The Penarth Centre SE15 1TR  
Unit 34 The Penarth Centre SE15 1TR  
Unit 31 The Penarth Centre SE15 1TR  
Unit 25 And 26 The Penarth Centre SE15 1TR  
Unit 14 And 15 The Penarth Centre SE15 1TR  
Units 18 And 33 The Penarth Centre SE15 1TR  
Unit 24 The Penarth Centre SE15 1TR  
Units 5 And 6 The Penarth Centre SE15 1TR  
Flat B 219 Ilderton Road SE15 1NS  
14-38 Hatcham Road London SE15 1TW  
227-255 Ilderton Road London SE15 1NS  
Flat 1 221 Ilderton Road SE15 1NS  
110-116 Ormside Street London SE15 1TF  
107-113 Ormside Street London SE15 1TF  
118-120 Ormside Street London SE15 1TF  
147 Ormside Street London SE15 1TF  
Unit 3 The Penarth Centre SE15 1TR  
113 Ormside Street London SE15 1TF  
Iberia House Manor Grove SE15 1EQ  
Ground Floor 78-94 Ormside Street SE15 1TF  
Part First Floor 78-94 Ormside Street SE15 1TF  
Unit 30 The Penarth Centre SE15 1TR  
25 Hatcham Road London SE15 1TW

10 Manor Grove London SE15 1SX  
Flat 1 213 Ilderton Road SE15 1NS  
Flat 2 211 Ilderton Road SE15 1NS  
Flat 2 213 Ilderton Road SE15 1NS  
Flat 1 211 Ilderton Road SE15 1NS  
Units 16 And 17 The Penarth Centre SE15 1TR  
First Floor 78-94 Ormside Street SE15 1TF  
Unit 1 2 And 4 The Penarth Centre SE15 1TR  
Unit 19 The Penarth Centre SE15 1TR  
Unit 21b The Penarth Centre SE15 1TR  
Flat A 152-154 Ilderton Road SE15 1NT  
Unit 28a The Penarth Centre SE15 1TR  
Units 32 And 32a The Penarth Centre SE15 1TR  
Unit 21a The Penarth Centre SE15 1TR  
Unit 28b The Penarth Centre SE15 1TR  
18-22 Penarth Street London SE15 1TX  
115-125 Ormside Street London SE15 1TB  
Flat B 152-154 Ilderton Road SE15 1NT  
Flat C 152-154 Ilderton Road SE15 1NT  
67-105 Ormside Street London SE15 1TF  
Unit 20 Right The Penarth Centre SE15 1TR  
Unit B 154 Ilderton Road SE15 1NT  
24a Manor Grove London SE15 1SX  
24b Manor Grove London SE15 1SX  
Unit A 154 Ilderton Road SE15 1NT  
Unit A 152 Ilderton Road SE15 1NT  
Unit B 152 Ilderton Road SE15 1NT  
Unit 1 And 2 96-108 Ormside Street SE15 1TF  
Unit 3 And 4 96-108 Ormside Street SE15 1TF  
Unit 20 Left The Penarth Centre SE15 1TR  
Flat Above 217 Ilderton Road SE15 1NS  
First Floor 96-108 Ormside Street SE15 1TF  
Unit 22 The Penarth Centre SE15 1TR  
Flat 2 221 Ilderton Road SE15 1NS  
5a Lewisham Way London se14 6pp  
Tenants & Occupants Of V22 Studios & Penarth  
Centre  
14 Regents Wharf All Saints Street N1 9RL

**Re-consultation: n/a**

### Consultation responses received

#### Internal services

Economic Development Team

#### Statutory and non-statutory organisations

Environment Agency

London Underground Limited

Metropolitan Police Service (Designing out Crime)

Thames Water - Development Planning

#### Neighbours and local groups

Tenants & Occupants Of V22 Studios & Penarth Centre

14 Regents Wharf All Saints Street N1 9RL

5a Lewisham Way London SE14 6PP