

Item No. 7.1	Classification: Open	Date: 27 November 2018	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 17/AP/4797 for: Full Planning Application Address: BURGESS BUSINESS PARK, PARKHOUSE STREET, LONDON, SE5 7TJ Proposal: Demolition of the existing buildings and redevelopment of the site to provide 499 residential units, up to 3,725sqm (GIA) of Class B1 commercial floorspace, up to 128 sqm (GIA) of Class D2 leisure floorspace and up to 551sqm of Class A1-A3 floorspace within 13 blocks of between 2-12 storeys (max AOD height 41.95m), with car and cycle parking and associated hard and soft landscaping.		
Ward(s) or groups affected:	Camberwell Green, St Giles and Faraday		
From:	Director of Planning		
Application Start Date 26/01/2018		Application Expiry Date: 18/05/2018	
Earliest Decision Date 21/10/2018		Time Extension Date: 27/05/2018	

RECOMMENDATION

1. That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement by no later than 27th May 2019 and subject to referral to the Mayor of London and the Secretary of State.
2. That environmental information be taken into account as required by Regulation 3(4) of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 (as amended).
3. That following the issuing of the permission, the Director of Planning place a statement on the Statutory Register pursuant to Regulation 24 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 which contains the information required by Regulation 21, and that for the purposes of Regulation 24(1)(c) the main reasons and considerations on which the planning committee's decision is based are as set out as in the report.
4. In the event that the requirements of (a) are not met by 27th May 2019, that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 309 of this report.

EXECUTIVE SUMMARY

5. This is a major application which seeks to redevelop a declining industrial estate to provide a mixed-use commercial and residential development. The site is located in a local Preferred Industrial Location and there would be a significant loss of B class floorspace as a result of the proposal, although much of the space is currently vacant and is of poor quality. The provision of different quantum of commercial floorspace within the development have been tested, and the proposal before Members is the option which would be able to deliver the most affordable housing. The applicant has committed to providing 35% affordable housing equating to 173 units, with a policy compliant tenure split of 70% social rented and 30% intermediate.

6. The application is accompanied by an Environmental Statement which identifies adverse effects during demolition and construction which to an extent could be mitigated by way of construction management measures, and on daylight and sunlight to neighbouring properties. The proposal would include buildings of up to 12-storeys in height and would be of a high quality of design. Whilst there would be some less than substantial harm to the setting of the grade II listed former Church of St George, this is considered to be outweighed by the benefits arising from the proposal including an increase in jobs at the site, high quality new commercial floorspace, and new housing including affordable housing. A policy compliant mix of dwellings and wheelchair housing would be provided, together with a good standard residential accommodation. The proposal would require the removal of 9 trees from the site, although 39 new trees would be planted, to supplement high quality new landscaping. The daylight and sunlight impacts are noted, but it is not considered that the impact upon local amenity would outweigh the benefits of the proposal; sound proofing within the new dwellings would limit the potential for noise complaints against existing commercial occupiers. The proposal would provide 15 accessible parking spaces, and future occupiers would be prevented from obtaining parking permits on the surrounding streets. Whilst the proposal would result in additional vehicle trips, these would not adversely impact upon the surrounding highway network and a s106 contribution would be required in the event that overcrowding were to occur on local busses. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a contribution to the Council's Carbon Off-set Green Fund would be secured through a s106 agreement. The proposal would be air quality neutral, and conditions are recommended to ensure that ground contamination, surface water drainage, archaeology and ecology would be adequately dealt with. A range of s106 obligations would be secured, including relocation support for an existing business. Overall, the benefits of the proposal are considered to outweigh the potential harm caused, and it is recommended that planning permission be granted, subject to conditions, a s106 agreement and referral to the GLA and Secretary of State.

BACKGROUND INFORMATION

Site location and description

7. The site is located on the north-eastern side of Southampton Way and measures 1.59 hectares (ha). Parkhouse Street forms a loop off Southampton Way and connects with Wells Way to the east. The site sits within that loop and

also extends to the northern side of Parkhouse Street, adjoining Burgess Park beyond. It currently contains buildings within office, light industrial and storage use, 33 and 45 Southampton Way which are in residential use, and a large brick chimney. Whilst the site is in a predominantly industrial area, the site adjoins residential uses on Southampton Way and Parkhouse Street and there are houses on the opposite side of Wells Way.

8. The site is within the setting of a number of heritage assets including the grade II listed Collingwood House on Cottage Green and 73, 75 and 77 Southampton Way. In addition, the proposed development could affect the setting of a number of heritage assets including the grade II Listed 113 Wells Way, the Wells Way Baths, the former Church of St George on Wells Way, and the Addington Square Conservation Area which is to the west across Burgess Park.
9. The site forms part of the Parkhouse Preferred Industrial Location which is of local importance, and this designation extends beyond the site boundaries to include the surrounding industrial sites. The site has a public transport accessibility level (PTAL) of 2 (low).



Site boundary in relation to wider PIL designation

Details of proposal

10. Full planning permission has been sought by Peachtree Services Ltd. for a comprehensive mixed-use redevelopment of the site which would be known as Camberwell Union. 33 and 45 Southampton Way, the chimney and a building next to 13 Parkhouse Street would be retained, but all other structures on the site would be demolished. The proposal is for A1/A3 (retail/café/restaurant), B1 (business) and D2 (leisure) class floorspace and 499 residential units, laid out in a series of 13 buildings ranging from 2-12 storeys in height. The existing and proposed floorspace figures are set out below:

Table 1

Land use	Existing GIA sqm	Proposed GIA Sqm	Net difference GIA sqm
A1/A3 (retail)	0 sqm	551 sqm	+ 551 sqm
B1 (business)	12, 559.3sqm	3,725 sqm	-8,834.3 sqm
C3 (residential)	135sqm	45,928 sqm	+45,793
D2 (leisure)	0 sqm	128 sqm	+ 128 sqm

11. Most of the development would be located on the larger, southern part of the site which sits to the south and west of Parkhouse Street and Wells Way, with two blocks located on the smaller part of the site which adjoins Burgess Park. On the larger part of the site the blocks would be arranged around a broadly L-shaped central street which would start close to the junction of Wells Way with Parkhouse Street leading south-west, and would then turn north-west connecting with Parkhouse Street. There would be a smaller, secondary street (described as The Mews) leading from Parkhouse Street to the new central street.



Site layout

12. Blocks A and B – These blocks would be located on the smaller, northern part of the site which adjoins Burgess Park. Block A would be a 2-storey terrace comprising 5 x 3-bedroom houses measuring a maximum of 6.4m high with a flat roof. Block B would be formed from an existing 2-storey plus basement commercial building which would be retained and extended by 3-storeys (to a maximum height of 18m) to provide an energy centre in the basement, B1 class floorspace on the ground floor and 20 flats above; new openings including balconies would be provided in the side elevations of the building.
13. Both blocks could be accessed from a gated route off Parkhouse Street or via a secondary pedestrian from an existing haulingway at 33 Southampton Way. There would be seven accessible car parking spaces in this area.
14. Block C – This would be located opposite 1-11 Parkhouse Street and would be 3-storeys high (10.6m) with a flat roof. It would comprise employment space on the ground floor and 6 flats above, all of which would be social rented units.
15. Blocks D and E– These adjoining blocks would be located on the south- western side of the new central street and block D would partly turn the corner onto Parkhouse Street. Both blocks would be 8 storeys high (26.8m) with the top two floors set back and would comprise B1 class floorspace on the ground floor and flats above (28 flats in block D and 31 in block E, all social rented). Block D would have a communal terrace at 5th floor level facing Parkhouse Street and

block E would have a communal terrace above the top floor. There would be a vehicular access from Parkhouse Street between blocks C and D, leading to a yard area at the rear.

16. Blocks F, G, H and I – These four blocks would be located on the northern part of the site fronting Parkhouse Street and the central street. Blocks F and G would be separated from blocks H and I by a new street (The Mews) leading off Parkhouse Street, but communal amenity space for the blocks would be connected via a pedestrian footbridge at first floor level. Block F would be 9-storeys high (30m) with the top two floors set back and would comprise B1 class and A3 (café space) on the ground floor with 58 flats above. Block G would be 6-8 storeys high (max. 26.8m) with B1 class space on the ground floor and 38 flats above.
17. On the north-western side of the central street Block H would be 9-storeys high (30m) with B1 class, A1 (retail) and plant space on the ground floor including an energy centre, and 62 flats above. Block I would adjoin this and would be the tallest part of the development, incorporating a 12-storey tower (39.8m) at the point where the direction of the central street would change from westward to northward. It would comprise B1 class space on the ground floor including a microbrewery with ancillary tap room, and 75 flats above.
18. Blocks J, K and L - These adjoining blocks would sit parallel with the southern arm of the central street. Blocks J and K would be part 7, part 10 and part 11-storeys high (max 36.3m) with a terrace at 7th floor level between the two blocks. They would contain B class floorspace on the ground floor, with 64 flats above block J and 54 flats above block K. Block L which would sit at the junction of Wells Way and Parkhouse Street would be 6-storeys high (20.9m) and would contain B1 class and A1 / A3 (retail / café) space at ground floor level with 35 flats above; there would be a communal terrace on the roof of this block. Block J would contain 28 intermediate units, block K would contain 22 intermediate units and block L would contain 31 social rented units and 4 intermediate units.
19. Block M – This block would adjoin block L and would sit parallel with Wells Way. It would be 4-storeys high (14.1m) and would contain 23 social rented units including duplex units spanning ground and first floor levels. There would be a vehicular access between blocks L and M leading to a rear yard containing accessible parking spaces.
20. Materials for the proposed development would be predominantly brick, with elements of metal cladding and curtain wall glazing.
21. Phasing – The submission advises that the works would take approximately 3 years to complete and would be carried out in two broad phases. Phase 1 would comprise blocks A and B and phase 2 would comprise blocks C to M.

Amendments

22. A number of amendments have been made to the proposal during the course of the application, which has reduced the number of residential units on the site from 505 to 499, increased the B class floorspace on the site by 350sqm, increased the D2 floorspace by 11sqm and reduced the A class floorspace by 19sqm. The amendments to the proposed buildings are summarised below:

Block A – Reduced in height by one storey and pulled further away from 1-13 Parkhouse Street;
Block B – existing building retained, extended and converted in lieu of demolition and new build;
Block D – Increased in height by one storey on the north-eastern corner;
Block F – New balconies added.
Block G – Reduced in height by one storey and balconies amended;
Block I – Reduced in height by two storeys and amendments to the architectural detailing;
Block J – Increased in height by 2 storeys;
Block K – Increased in height by one storey;
Block M – Front gardens to this block reduced in size to increase the width of the pavement.

23. In addition, alterations to internal layouts, unit mix, window and balcony sizes and pavement widths to allow for tree planting were included in the amended submission.

Planning history

Entire site

24. 17/AP/1923 - Redevelopment of site comprising approximately 400 residential units and approximately 6,000 sqm (NIA) of commercial space within buildings up to 18 storeys in height. EIA scoping opinion issued
25. 16/EQ/0252 Application type: Pre-Application Enquiry (ENQ)
Re-development of the site to deliver 4,100sqm of commercial floor space and 409 residential units.
26. Pre-application advice was provided, details of which are held electronically by the Local Authority and is included as Appendix 3. Advice focussed on the principle of the proposed development in terms of land use including the provision of commercial space, the height and layout of the proposed development, impacts upon neighbouring properties and affordable housing.

Unit 1, Burgess Business Park

27. 17/AP/1920 - Notification of prior approval for proposed change of use of a building from use Class B1(a) to provide 11 residential units (C3). Prior approval refused for the following reasons:
- 1) The proposal fails to provide sufficient detail of cycle parking storage or information on the level of car parking contrary to criterion a - 'Transport and highways impacts of the development' of the Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 3, Class O as amended.
 - 2) The proposal fails to provide sufficient information regarding any flood risk arising from the change of use, and fails to provide adequate mitigation measures against the potential flood risk of the application site contrary to criterion c 'flooding risks on the site', of the Town and Country Planning (General

Permitted Development) (England) Order 2015, Schedule 2, Part 3, Class O as amended.

Unit 4, Burgess Business Park

28. 17/AP/1921 - Notification of prior approval for proposed change of use of a building from use Class B1(a) to provide 16 residential units (C3). Prior approval was required and refused in June 2017 for the following reasons:

1) The proposal fails to provide disabled parking and sufficient detail of cycle parking storage or information on the level of car parking contrary to saved policies 5.3 - Walking and Cycling, 5.6 – Parking and 5.7 – Parking for disabled users of The Southwark Plan 2007, SP2 - Sustainable Transport of The Core Strategy 2011 and The National Planning Policy Framework 2012.

2) The proposal fails to provide sufficient information on the positioning and locations of bedrooms, kitchens, bathrooms and other residential uses, and fails to provide adequate mitigation measures against the potential flood risk of the application site contrary to saved policy 3.31 – Flood defences of the Southwark Plan 2007, section 5.12 – Flood Risk Management of the London Plan 2016, and section 10 – Meeting the challenge of climate change, flooding and coastal change of the National Planning Policy Framework 2012.

10-12 Parkhouse Street

29. 13/AP/4584 - Change of use from Class B1(a) office use to create 39 residential dwellings (C3 Use Class). Prior approval was required and was granted, but was not implemented.
30. 17/AP/0590 - Change of use from Class B1(a) office use to create 39 residential dwellings (C3 Use Class). Prior approval was required and was granted but has not been implemented.

Planning history of adjoining sites

21-23 Parkhouse Street

31. 17/AP/1723 - Demolition of existing building and erection of two blocks (Block A and Block B) of 5 and 9 storeys. Block A to comprise a 5-storey block for B1(c) commercial/employment use (1030sqm). Block B to comprise a 9-storey block with ground floor B1(c) commercial/employment use (89sqm) and 32 residential dwellings (8x1 bed, 16x2 bed, 8x3 bed). Together with associated accessible and car-club parking, landscaping, cycle parking and refuse store. Application WITHDRAWN (it is noted that this proposed development has been included in the cumulative impact assessment within the Environmental Statement).

66 Wells Way and 41 and 43 Parkhouse Street

32. 17/AP/4381 - Demolition of existing building located at 41-43 Parkhouse Street, and the construction of an extension to the existing building located at 66 Wells Way to be used for B2/B8 and Sui Generis (Waste Transfer) Uses in connection with the existing use of the retained building. Together with alterations to the existing vehicular access on Parkhouse Street, and the provision of associated car and cycle parking facilities. Planning permission was GRANTED in February 2018.

49-65 Southampton Way

33. Demolition of existing warehouse (Use Class B8) and office buildings (Use Class B1A) and the erection of a part 2, part 4-storey building plus basement comprising self storage facility (Use Class B8) and flexible office space (Use Class B1A) together with vehicular and pedestrian accesses, parking, associated works and landscaping. Planning permission was GRANTED in April 2018. Pre-commencement conditions for this permission are currently being discharged.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

34. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use, including departure from policies to protect preferred industrial locations
 - Equality implications
 - Environmental impact assessment
 - Design, including building heights and impacts of tall buildings on local views
 - Impact on heritage assets
 - Density
 - Affordable housing
 - Mix of dwellings
 - Wheelchair accessible housing
 - Quality of accommodation
 - Trees and landscaping
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area
 - Noise and vibration
 - Transport
 - Air quality
 - Ground conditions and contamination
 - Flood risk
 - Sustainable development implications
 - Archaeology
 - Wind microclimate
 - Ecology
 - Socio-economic impacts and health
 - Planning obligations (S.106 undertaking or agreement)
 - Mayoral and Borough community infrastructure levy (CIL)
 - Statement of community involvement
 - Other matters

Planning policy

Policy Designations (Proposals Map)

- 35. - Urban Density Zone
- Air Quality Management Area
- Parkhouse Preferred Industrial Location (PIL) - local
- Possible Public Transport Depot (no longer required)
- Area where 35% affordable and 35% private housing is required.

National Planning Policy Framework 2018 (the Framework)

- 36. Section 2 – Achieving sustainable development
- Section 5 – Delivering a sufficient supply of homes
- Section 6 – Building a strong and competitive economy
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 11 – Making efficient use of land
- Section 12 – Achieving well designed places
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

National Planning Practice Guidance

The London Plan 2016

- 37. Policy 3.1 - Ensuring Equal Life Chances For All
- Policy 3.3 - Increasing housing supply
- Policy 3.5 - Quality and design of housing developments
- Policy 3.6 - Children and young people's play and informal recreation facilities
- Policy 3.8 - 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 4.2 - Offices
- Policy 4.3 - Mixed use development and offices
- Policy 4.4 – Managing industrial land and premises
- Policy 4.7 - Retail and Town Centre Development
- Policy 4.8 - Supporting a Successful and Diverse Retail Sector
- Policy 4.12 - Improving Opportunities for All
- Policy 5.1 - Climate Change Mitigation
- Policy 5.2 - Minimising Carbon Dioxide Emissions
- Policy 5.3 - Sustainable Design and Construction
- Policy 5.5 - Decentralised Energy Networks
- Policy 5.6 - Decentralised Energy in Development Proposals
- Policy 5.7 - Renewable energy
- Policy 5.8 - Innovative energy technologies
- Policy 5.9 - Overheating and Cooling
- Policy 5.10 - Urban Greening
- Policy 5.11 - Green roofs and development site environs

Policy 5.12 - Flood risk management
Policy 5.13 - Sustainable drainage
Policy 5.14 - Water Quality and Wastewater Infrastructure
Policy 5.15 - Water Use and Supplies
Policy 5.21 - Contaminated land
Policy 6.9 - Cycling
Policy 6.10 - Walking
Policy 6.13 - Parking
Policy 7.1 - Building London's Neighbourhoods and Communities
Policy 7.2 - An inclusive environment
Policy 7.3 - Designing out crime
Policy 7.4 - Local character
Policy 7.5 - Public Realm
Policy 7.6 - Architecture
Policy 7.7 - Location and design of tall and large buildings
Policy 7.8 - Heritage assets and archaeology
Policy 7.14 - 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

Core Strategy 2011

38. Strategic Policy 1 – Sustainable development
Strategic Policy 2 – Sustainable transport
Strategic Policy 3 – Shopping, leisure and entertainment
Strategic Policy 4 – Places for learning, enjoyment and healthy lifestyles
Strategic Policy 5 – Providing new homes
Strategic Policy 6 – Homes for people on different incomes
Strategic Policy 7 – Family homes
Strategic Policy 10 – Jobs and businesses
Strategic Policy 11 – Open spaces and wildlife
Strategic Policy 12 – Design and conservation
Strategic Policy 13 – High environmental standards

Southwark Plan 2007 (July) - saved policies

39. 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.

1.1 - Access to employment opportunities
1.2 - Strategic and local preferred industrial locations
1.5 - Small businesses
2.2 - Provision of new community facilities

- 2.5 - Planning obligations
- 3.2 - Protection of amenity
- 3.3 - Sustainability assessment
- 3.4 - Energy efficiency
- 3.6 - Air quality
- 3.7 - Waste reduction
- 3.9 - Water
- 3.11 - Efficient use of land
- 3.12 - Quality in design
- 3.13 - Urban design
- 3.14 - Designing out crime
- 3.15 - Conservation of the historic environment
- 3.16 - Conservation areas
- 3.18 - Setting of listed buildings, conservation areas and world heritage sites
- 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

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

Draft New Southwark Plan (NSP)

41. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The Council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. It is anticipated that the plan will be adopted in 2019 following an Examination in Public (EIP). As the New Southwark Plan is not yet an adopted plan, it has limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework. The following emerging policy is relevant to this application.
42. Proposal site designation NSP23 in the draft NSP which covers this entire local PIL, not just the application site. The draft policy advises that redevelopment of the site must:
- Re-provide at least the amount of employment floorspace (B class) currently on the

site or provide at least 50% of the development as employment floorspace;

- Provide new homes (C3);
- Enhance permeability including new north-south and east-west green links;
- Provide public realm improvements including a square.

43. Redevelopment of the site should:

- Provide industrial employment space (B2, B8);
- Provide active frontages (A1, A2, A3, A4, D1, D2) at appropriate ground floor locations.

44. Redevelopment of the site may:

- Provide extra care housing (C2).

45. The detailed guidance advises that by developing at a higher density the amount of small business space will represent at least 50% of the proposed floorspace, with opportunities to incorporate new housing. Negative impacts upon neighbouring properties should be avoided. The draft policy notes that the Council is changing its approach to industrial land in certain locations to accommodate mixed neighbourhoods, new homes, jobs and community facilities, and notes the importance of providing a variety of types of employment spaces.

46. The draft policy advises that comprehensive mixed-use redevelopment of the site could include taller buildings, subject to consideration of impacts on existing character, heritage and townscape. Development on the site should establish green links into Burgess Park and from Chiswell Street to Newent Close, and provide public access to new public realm in the site. Consideration should be given to focal points of activity and active frontages that encourage footfall, and should enhance existing and proposed pedestrian and cycle routes.

Draft New London Plan

47. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. The document is expected to reach examination stage later this year however, given the stage of preparation it can only be attributed limited weight.

Principle of proposed development in terms of land use, including departure from policies to protect preferred industrial locations

48. The proposed development would not re-provide the full amount of existing employment floorspace which would not comply with strategic policy 10 of the Core Strategy or draft site designation NSP23. It would also introduce residential and retail uses within a preferred industrial location which would be a departure from saved policy 1.2 of the Southwark Plan. Neighbouring residents have raised concerns including the loss of employment floorspace on the site, lack of demand for the retail space, and the need for affordable workspace.

49. Policy 4.4 of the London Plan relates to managing industrial land and premises and requires Local Authorities to identify and protect locally significant industrial sites where justified by evidence of demand. At a borough level the site is located in the Parkhouse Street preferred industrial location (PIL), which is a PIL of local importance

identified in the Core Strategy. Strategy policy 10 of the Core Strategy states that the PILs will be protected for industrial and warehousing uses. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in PILs are B class uses and other sui generis uses which are inappropriate in residential areas. The Core Strategy recognises that structural changes in the economy are resulting in a declining need for industrial land in London. Saved Policy 1.5 is also relevant which encourages the provision and requires the replacement of small business units.

50. The existing buildings on the site provide 12,559.3sqm (GIA) of commercial floorspace, although only 3,938sqm of it is occupied. This includes 1,598sqm of floorspace which is occupied by Arbeit, a workspace provider which provides creative workspace and studio space for artists. Arbeit took on the space on a temporary basis in December 2017 as a meanwhile use.
51. The applicant took over the management of the site 10 years ago and has advised that several of the units, including 10-12 Parkhouse Street which provides 2,104sqm of floorspace, have been vacant for over 10 years in spite of marketing to seek to fill the space. Current occupiers are Peach Tree Services Ltd, the applicant, which is a property management company (1,148sqm for office and storage space), Swiss Postal Solutions Ltd which provide electronic document management and business processes services (677sqm for office use) and a car wash (515.5sqm); there are 57 people employed at the site, most of whom (51) are employed by Swiss Postal Solutions. A further 1,598sqm of floorspace The submission includes information about Fruitful Office Ltd which had occupied 1,766.9sqm of space at the site, but they had outgrown their premises and relocated to a new site in Croydon in September.
52. The proposed development would provide 3,725 sqm of B class floorspace across the site. Therefore, there would be a significant loss of B class floorspace of 8,834.3sqm. This would be contrary to strategic policy 10 of the Core Strategy which seeks to protect employment floorspace in Preferred Industrial Locations. The proposal would also introduce A class, D class and residential floorspace into the PIL which would represent a departure from saved policy 1.2 of the Southwark Plan which only permits B class and sui generis uses in these locations.
53. In determining whether the principle of the proposed development would be acceptable in land use terms Members should consider whether the wider regeneration benefits of the scheme would outweigh any harm caused, and whether those benefits would justify a departure from the adopted planning policy. Officers consider that the key benefits arising from the proposal would be as follows:

Regeneration of an aging industrial estate

54. A borough-wide Southwark Employment Land Study dated January 2016 was carried out by CAG Consultants on behalf of the Council, to form part of the evidence base for the NSP. It describes the quality of the commercial accommodation at Burgess Business Park as fair, but notes that some is clearly aged and deteriorating. It advises that the site provides valuable B-class space, albeit within a dense residential area and on a site that could be considered 'off-pitch' from a market perspective, and that whilst the site might be considered for protection because demand might remain strong, attracting new investment to update the premises might prove problematic due to the residential character of the wider area. The report recommends that consideration be given to supporting mixed-use development on the site, or possible release for residential use.

55. The planning application advises that the existing employment space on the site is of poor quality; both parts of the site currently only have one access point each and contain large areas of parking, the buildings are of poor quality construction with inefficient layouts and design, and they have limited environmental credentials. The submission advises that these issues render them unsuitable to meet modern requirements, and that their poor state of repair would require a significant amount of investment to bring them up to modern standards.
56. The proposed development would provide modern employment space which has been designed to incorporate a range of different B1 uses comprising large and small 'maker' spaces (2,023sqm), co-working and creative office space (1,362sqm), a microbrewery with ancillary tap room (264sqm) and a lettings office (76sqm). The commercial space has been designed to be flexible so that units could move between the different types of B1 spaces if required. The units could also be subdivided or enlarged to meet end user requirements.
57. The maker spaces would range from 23-400sqm in size, and the units within blocks C, D and E would have access to yards at the rear of the block. Following discussions with Arbeit the scheme was amended to cluster the small maker spaces around the proposed mews street off Parkhouse Street, to make the units smaller, to include glazed and shuttered shopfronts to the units and stores at the rear, and to incorporate an ancillary gallery and office space to support the future occupiers. It is anticipated that they would be occupied by small companies and individuals requiring space for activities such as small scale manufacturing, bespoke artisanal production, research, product development and prototyping. The design of the commercial units has been informed by other employment spaces including Pullen's Yard in Walworth which provides artist and employment space, and following discussions with potential occupiers and Arbeit. The units would be well-lit, would have floor-to-ceiling heights of ranging from 3.2m-4,5m, and the larger units would be dual aspect.

Job creation

58. Based on current employment densities the site would have supported around 636 jobs if fully occupied. The buildings have not been fully occupied for at least 10 years however, and excluding the meanwhile use, currently only employs 57 people. This would increase to 255 jobs within the completed development which is a significant positive aspect of the proposal, and some 435 jobs would be created during the construction period.
59. In recognition of the loss of B class floorspace a contribution of £84,349 would be provided through the s106 agreement, to contribute towards skills and employment programmes in the borough. This has been calculated in accordance with the Council's adopted Planning Obligations and CIL SPD.

The potential to attract a specialist workspace provider to manage new and refurbished space

60. In formulating the commercial component of the scheme the applicant has worked with CF Commercial, has met with potential occupiers of the space, and has reviewed workspace developments across London including Pullen's Yard and the Galleria in Peckham.

61. The applicant has approached a number of workspace providers from the Council's Workspace Provider List and other Southwark-based organisations, and has held meetings with Arbeit (now in temporary occupation at part of the site), ASC Studios and The Art Academy. These organisations all specialise in providing affordable workspace and could manage affordable workspace within the development (details below). It is recommended that a clause be included in the s106 agreement ensuring the delivery of the commercial space before a proportion of the residential space can be occupied, and requiring the appointment of a specialist workspace provider.
62. An outline estate management strategy has been included in the submission which would be developed further and secured through the s106 agreement. Key principles include a dedicated site manager who would be responsible for the day-to-day management of the development and overseeing servicing of the proposed commercial space.

Provision of affordable workspace

63. Emerging policy P28 in the draft NSP 'Small and independent businesses' requires developments to retain small and independent businesses, and where they are at risk of displacement, to consider the feasibility of providing affordable and suitable space for existing occupiers within the proposed development. It also requires developments to incorporate well designed and flexible units suitable for small and independent businesses including a range of unit sizes and types.
64. The proposal would include 19 small units clustered around the mews street which would be suitable for small and independent businesses. It is proposed that 10% of the commercial space (372.5sqm) would be offered to small and independent businesses and the basic terms would be as follows:
 - Occupier rents of £16 per square foot per year compared to £22.50 per square foot for market value. This therefore equates to 71% of market rent.
 - Fit out would comprise electricity, WCs and shared facilities including kitchen;
 - Flexible Leases from 12 months up to 5 years;
 - The units would only be available for a business which has a single premises;
 - During an initial marketing period of 6 months the affordable workspace provider would endeavour to let the space to occupants who have an existing business in Southwark or are a resident of Southwark;
 - During the construction period a database of interested parties would be compiled and maintained;
 - On completion the units would be marketed using a website, social media and external signage;
 - Units would be actively marketed for 6 months to Southwark businesses / residents. Only if the units remain unoccupied after this period of marketing would the units be made available to the open market and rented to any interested party for up to five years. After those five years, the process would start again. During this time the existing tenant can remain until an "Affordable Category" tenant is found;
 - Day-to-day management of the units would be carried out by a suitably qualified affordable workspace provider;
 - The units would remain as affordable units for a period of 15 years.
65. Emerging policy P38 of the draft NSP 'Business Relocation' requires that where existing small or independent businesses or small shops are displaced by a

development, a business relocation strategy, in written consultation with affected businesses, must be provided. This must include details of existing levels of non-residential floorspace, a schedule of the affected businesses including use, employees and lease terms, proposed levels of non-residential floorspace, details of engagement with the affected businesses and details of engagement with workspace providers to secure occupiers for new employment space.

66. The applicant has submitted a Draft Business Relocation Strategy which provides details relating to Swiss Postal and the Continental Car Wash. It also provides details of Fruitful Office but as stated, this business has recently relocated. Arbeit has not been included on the basis that it is a temporary use, neither has the space on the site which is occupied by the applicant as this would be reprovided in one of Peachtree's other sites.
67. Swiss Postal Solutions is an international business with offices in Europe, the USA, Australia and Asia and which currently employs 51 people at the site; they have a lease until September 2021. The applicant has not yet commenced discussions with this business, but the draft strategy advises that it could be accommodated in the office space within the proposed development. However, as the site would be predominantly cleared the business would have to find temporary accommodation during demolition and construction works. The strategy advises that if permission is granted, the applicant would initiate discussions with this business 6-12 months prior to practical completion with regard to them returning to the site should they wish, and this could be secured in the s106 agreement. Officers note that as this is an international business it is more likely to have the resources in place to support it through any relocation than a small, independent business.
68. Continental Car Wash and valeting service operates from a building on Parkhouse Street. It currently employs 5 people and has a yearly lease which will come to an end on 22nd February next year, with a landlord 2-week break clause. The draft strategy advises that this business requires parking for cars waiting to be washed which cannot be accommodated within the proposed development. It also advises that noise and traffic generated by this business from running vehicle engines and car washing operations may cause disturbance to residential occupiers. As such there have not been any discussions with this business to date. The Council's Environmental Protection Team has confirmed that a number of complaints have been made by neighbouring residents regarding noise from the car wash, but that the impacts were not sufficient to warrant formal action.
69. The car wash is a small, independent business but officers recognise the potential constraints in it being reprovided within the proposed development. It is therefore recommended that the s106 agreement requires the developer to assist this business in finding an alternative premises should they wish to relocate.

Creation of a vibrant, mixed-use development

70. In addition to the B class floorspace the proposal would provide A and D class uses which are currently anticipated as being a bicycle shop, a café and a gym, plus a significant quantum of residential units. The A and D class uses would offer additional services to the wider neighbourhood which is considered to be a positive aspect of the proposal. Although not within a town centre, the scale of retail proposed would be relatively minor and would serve a localised catchment. The development would include new areas of public realm with external seating which would be available for

the whole community, and which could be used for events such as farmers' markets and arts and craft fairs managed by the dedicated site management. It is recommended that a clause be included in the s106 agreement securing public access through the site.

Provision of housing including affordable housing

71. There is a pressing need for housing across London, and the emerging policy for this site within the draft NSP requires redevelopment of the site to provide new homes. The proposal would deliver 499 new residential units including 35% affordable housing, which is considered to be a significant positive aspect of the proposal; this is considered further in the affordable housing section of this report.

Land use assessment against draft proposal site designation NSP23

72. As stated, draft site designation NSP23 requires redevelopment of the site to replace the existing B class floorspace or provide 50% of the development as employment floorspace, and to provide new homes. It advises that redevelopment should provide industrial employment space within use classes B2 and B8, and active frontages falling within use classes A1-A4, D1 and D2.
73. The proposal would provide new homes and new A1-A4 and D2 uses, but would deliver significantly less B class floorspace than currently exists on the site. It would also not deliver any B2 or B8 floorspace, as these may not be compatible with the new residential uses and the surrounding residential properties, and B8 uses are like to attract more and larger vehicles which would be difficult to accommodate on this site.
74. The loss of B class floorspace which would arise from the proposal has been raised as a concern by the GLA in their stage 1 response. A larger amount of B class floorspace on the site would reduce the number of new homes which could be accommodated here, and this in turn impacts on viability, and the ability of the development to provide affordable housing. The Council's viability advisor for this application, GVA, has therefore tested the impact that delivering various quantum of B class floorspace on the site would have on the amount of affordable housing which could be provided, and the four options which have been tested are set out below.
75. Option 1 – This is the current proposal which includes 3,725sqm of B class floorspace, equating to approximately 30% re-provision. GVA has advised that this proposal can viably support 19.4% affordable housing. The applicant has nonetheless offered 35% affordable housing which would be secured through the s106 agreement, equating to 173 affordable units.
76. Option 2 – This option would deliver 453 residential units and 6,279.65sqm of B class floorspace, equating to 50% re-provision. This could support 17.5% affordable housing, equating to 134 affordable units.
77. Option 3 – This option would deliver 425 residential units and 7,912.3sqm of B class floorspace, equating to 63% re-provision. This could support 16.84% affordable housing, equating to 129 affordable units.
78. Option 4 – This option would deliver 390 residential units and 12,308sqm of B class floorspace equating to 98% re-provision. This could support 14.41% affordable housing, equating to 108 affordable units.

79. The above demonstrates that increasing the amount of B class floorspace on the site would have a significant impact upon the amount of affordable housing which could be delivered. The applicant has also advised that they would not propose to go forward with a scheme which had a significantly larger quantity of employment space on the site because they do not consider that it would be deliverable in this location, and have concerns as to whether there would be demand for significant additional employment space here. The current proposal would deliver the most affordable housing, and the loss of B class floorspace needs to be weighed in the balance with the other benefits arising from the proposal including housing delivery and an increase in jobs at the site.
80. Conclusion to land uses - The proposed development would result in a significant loss of B class floorspace which would be contrary to strategic policy 10 of the Core Strategy. It would also introduce residential, A and D class uses into a PIL which represents a departure from saved policy 1.2 of the Southwark Plan. This must therefore be weighed against the benefits of the scheme including regenerating an aging industrial estate, job creation, the provision of good quality, flexible commercial space including affordable commercial space, and a sizeable contribution to the stock of housing in the borough including 35% affordable housing. The site sits within a relatively isolated industrial area, remote from the main trunk road network and with low access to public transport. In these circumstances it is considered reasonable to give greater weight to the provision of new housing, and the valuation conclusions confirm that higher amounts of B class floorspace would have a significant impact upon both the total number of residential units which could be provided, and the proportion of those which could be made affordable. Officers therefore consider that in land use terms the benefits would outweigh the loss of B class floorspace in this instance, and that the proposal would not prejudice the objectives of the emerging site designation in the draft NSP. The NSP does not propose to maintain the PIL designation, and allows for the introduction of non-B class uses at the site.

Equality implications

81. The site contains one business owned by a person from an ethnic minority, who would be given assistance by the developer in finding a new premises if required. The proposed development would increase jobs at the site and would provide new homes, potentially benefitting a broad range of people.

Legal context

82. The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender reassignment, pregnancy and maternity, race, religion, or beliefs and sex and sexual orientation. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and Members must be mindful of this duty when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
 - Advance equality of opportunity between persons who share a relevant

protected characteristic and persons who do not share it;

- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

83. This section of the report examines the impact of the proposal on those with protected characteristics and with a particular focus on the Council's legal duties under s.149 of the Equality Act 2010. The main issue is the displacement of existing businesses. The proposed development would require the demolition of most of the existing buildings on the site, and the new buildings would be delivered in two phases.

Available material

84. The applicant has submitted an Equalities Statement in support of the application which was updated in August. The proposal would displace existing businesses Swiss Postal and the Continental Car Wash. It would also displace space used by the applicant, but this would relocate to one of Peachtree's other sites. No equalities survey of the Swiss Postal employees has been undertaken, although it is noted that it is an international business and as such is likely to have the resources needed to help it through a relocation process. This business could, in any event, be accommodated within the proposed development and the s106 would require the developer to facilitate this should the business wish to stay. Continental Car Wash is a small, independent business currently employing five people.

Negative equality impacts

85. The only negative impact which has been identified is in relation to race, on account of the loss of the car wash. The Equalities Statement advises that the business owner is from an ethnic minority and the employees are Eastern European. There are no proposals to accommodate this business within the development therefore it would have to relocate. The business owner could potentially experience difficulties in finding alternative premises.

86. The Equalities Statement does not suggest any specific mitigation to deal with this, but the applicant has agreed to support the business owner in finding new premises should they wish, and this would be secured through the s106 agreement.

Positive and Neutral equality impacts

87. The Equalities Statement advises that the proposal would have positive, neutral and no equality effects in relation to age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race and sexual orientation, and these are summarised in the table below:

Characteristic	Potential effects	Reason and nature of effect
Age	Neutral and positive	<u>Neutral</u> impacts during the construction process. Construction management processes and complaints procedures in place which would have regard to people sharing protected characteristics, including people with disabilities and the elderly. <u>Positive</u> impacts arising from the increase in jobs which would benefit people of all ages,

		good quality housing including affordable and family housing, an inclusive built environment including level pathways, seating, dropped kerbs and accessible parking.
Disability	Neutral and positive	<u>Neutral</u> impacts during construction owing to construction management and health and safety processes. <u>Positive</u> impacts through job creation which would increase opportunities, 10% wheelchair accessible housing and accessible public realm.
Gender and gender reassignment	Neutral, positive, and no effect	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment opportunities; employers would have to comply with equalities legislation. <u>No effects</u> identified in relation to the new residential accommodation and public realm.
Marriage and civil partnership	Neutral, positive, and no effect	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment opportunities; employers would have to comply with equalities legislation. <u>No effects</u> identified in relation to the new residential accommodation and public realm.
Pregnancy and maternity	Neutral and positive	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment opportunities; employers would have to comply with equalities legislation. Good quality housing and accessible public realm would be provided, together with playspace for younger children.
Race	Neutral, negative, no effects	<u>Negative</u> – Loss of the existing car wash as the business owner is from an ethnic minority and the employees are Eastern European. Noted that overall jobs at the site would increase. <u>Neutral</u> - impacts during construction. Contractors would have to comply with equalities legislation. <u>No effects</u> in relation to the residential accommodation or public realm / site accessibility.
Religion or belief	Neutral, positive, no effects	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment

		opportunities; employers would have to comply with equalities legislation. <u>No effects</u> in relation to the residential accommodation or public realm / site accessibility.
Sexual orientation	Neutral, positive, no effects	<u>Neutral</u> impacts during construction. Contractors would have to comply with equalities legislation. <u>Positive</u> impacts from the provision of commercial space and employment opportunities; employers would have to comply with equalities legislation. <u>No effects</u> in relation to the residential accommodation or public realm / site accessibility.

88. Conclusion to equality implications – The equality impacts of the proposal would generally be positive, although it does have the potential to result in an adverse equality effect in relation to race owing to the loss of the existing car wash. The s106 agreement would require the developer to assist this business in finding alternative premises, although this may or may not be successful. Members must therefore keep this firmly in mind in the decision-making process, and weigh this negative equality impact in the balance with all of the other benefits and disbenefits of the proposal. Given the range of positive equality impacts which would arise including from an increase in jobs at the site, officers consider that the benefits would outweigh the harm in this instance.

Environmental impact assessment

89. The application is accompanied by an Environmental Statement (ES), following the advice in the Council's Scoping Opinion.
90. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether they constitute Schedule 1 (mandatory) or Schedule 2 (discretionary) development in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended). In this case the proposed development falls under Schedule 2, Category 10b 'urban development project' of the EIA Regulations where the threshold for these projects is development including one hectare or more of urban development which is not dwellinghouse development, development including more than 150 dwellings, and development where the overall area of the development exceeds 5 hectares. The development would provide more than 1 hectare of development which is not dwellinghouse development, and would provide more than 150 dwellings. Notwithstanding this, an EIA is only required if it is likely to generate significant environmental effects having regard to the criteria set out in Schedule 3 of the Regulations, which include:
- the characteristics of the development;
 - the environmental sensitivity of the location; and
 - the characteristics of the potential impact.
91. It is considered that the proposed development would generate significant

environmental effects based upon a review of Schedule 3, and therefore an EIA is required.

92. Prior to the submission of the application the applicant requested a formal 'Scoping Opinion' under Regulation 13 of the EIA Regulations, to ascertain what information the Local Planning Authority considered should be included within the Environmental Statement (ES) (application reference 17/AP/1923).
93. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES including any further information, together with any representations made by consultation bodies and any other person about the environmental effects of the development.
94. The ES must assess the likely environmental impacts at each stage of the development programme, and consider impacts arising from the demolition and construction phases as well as the impacts arising from the completed and operational development.
95. It is not necessarily the case that planning permission should be refused if a development has the potential to have significant adverse impacts; it has to be decided whether any of the identified adverse impacts are capable of being mitigated, or at least reduced to a level where the impact would not be so significant or adverse as to warrant a refusal of planning permission.
96. It is noted that the EIA regulations were amended in 2017. However, the amendments came into force on 16th May 2017 and for planning applications accompanied by an ES or scoping opinions which were submitted before this date, the 2011 Regulations continue to apply. The scoping opinion relating to this application was submitted on 15th May 2017 therefore the 2011 Regulations apply.
97. The submitted ES comprises the Main Text, Technical Appendices, Built Heritage, Townscape and Visual Impact Assessment, and a Non-Technical Summary. It details the results of the EIA and provides a detailed verification of the potential beneficial and adverse environmental impacts in relation to the proposed development, including the following areas of impact (in the order that they appear in the ES):

Socio Economics and Health
Traffic and Transport
Air Quality
Noise and Vibration
Daylight, Sunlight and Overshadowing
Wind microclimate and
Built Heritage, Townscape and Visual.

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

99. The impacts of the proposed development are expressed as follows:

100. Nature of an effect:

- Adverse - Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
- Beneficial - Advantageous or positive effect to an environmental / socio-economic resource or receptor. The quality of the environment is enhanced.
- Neutral - Where the quality of the environment is preserved or sustained or where there is an equal balance of benefit and harm.

101. Scale of an effect:

- Major – These effects may represent key factors in the decision-making process. Potentially associated with sites and features of national importance or could be important considerations at a regional or district scale. Major effects may also relate to resources or features which are unique to a receptor and which, if lost, cannot be replaced or relocated.
- Moderate - These effects, if adverse, are likely to be important at a local scale and on their own could have a material influence on decision-making.
- Minor - These effects may be raised as local issues and may be of relevance in the detailed design of the project, but are unlikely to be critical in the decision-making process.
- Negligible - Effects which are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error, these effects are unlikely to influence decision-making, irrespective of other effects.

102. Whether an effect is significant or not:

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

Geographic extent of effect

103. At a spatial level, 'site' or 'local' effects are those affecting the application site and neighbouring receptors, while effects upon receptors in the borough beyond the vicinity of the application site and its neighbours are at a 'district / borough' level. Effects affecting Greater London are at a 'regional' level.

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

Alternatives

105. Schedule 4 of the EIA Regulations sets out the information that is required for an ES, which includes an outline of the main alternatives considered. The ES considers three alternative options which are the 'Do Nothing' scenario, alternative sites, and 'Alternative Designs'.

The 'Do Nothing' scenario

106. This scenario would involve leaving the site in its current condition. This option has not been considered by the applicant on the basis that the site represents an opportunity to redevelop a brownfield area in the heart of London, providing residential accommodation, different types of employment space, and independent retail uses. The ES advises that this would lead to employment opportunities and other direct and indirect socio-economic benefits which would not otherwise be realised if the site were left as it is.
107. Although in draft form at present, officers note that the site is designated as a proposal site in the draft NSP which supports a move away from a solely industrial site to a mixed use development including employment space and new homes. Officers consider that the 'Do Nothing' scenario could result in a number of missed opportunities including to increase the number of jobs at the site, the delivery of a significant quantum of new housing on the site including affordable housing, and the provision of new public realm.

Alternative sites

108. The ES advises that no alternative sites have been considered for the proposed development, and that the site is an area of brownfield land in need of regeneration. It advises that the site is in an area which is undergoing regeneration and so it is appropriate to consider it as a viable redevelopment opportunity. Officers again note that the draft NSP designates the site as a proposal site suitable for comprehensive redevelopment.

Alternative Designs

109. The ES describes the design evolution of the proposed development. This included amendments to the position of the various buildings on the site including the proposed tower, changes to improve the quality of the public realm, changes to the servicing arrangements for the site and changes to the building heights. Officers note that a number of further changes have been made during the course of the application.

Cumulative effects

110. Two types of cumulative effects have been considered within the ES. The first is effects arising from the proposed development combined with effects from other developments in the surrounding area (i.e. cumulative schemes). The second is how the various effects of the proposal could interact to jointly affect receptors at and around the site (effect interactions).
111. The ES concludes that if the proposal is built at the same time as another consented development on Parkhouse Street there would be cumulative noise and vibration effects during demolition and construction which would be temporary, local, adverse

and moderate adverse (significant).

112. With regard to daylight and sunlight, whilst a number of properties would experience daylight and sunlight impacts as a result of the completed development, only two would experience VSC impacts in the cumulative scenario. 13 Parkhouse Street would experience daylight effects that would range from negligible to major adverse. In the cumulative scenario one further window would not comply with the Building Research Establishment (BRE) guidance, with a second floor window having a vertical sky component of 26.88% where the guidance recommends 27%. This would equate to a low magnitude of cumulative impact and a minor adverse cumulative effect on this window. In addition 83 Wells Way would experience a cumulative daylight (VSC) effect to a ground floor window, 23.97% VSC). This would equate to a low magnitude cumulative impact and a minor adverse cumulative effect on this window. There would be no further shortfalls for any properties in the cumulative scenario for No Sky Line (NSL) (daylight) and Annual Probable Sunlight Hours (APSH) test.
113. With regard to effect interactions during demolition and construction, there would be an adverse noise and air quality effect interaction which would be significant for properties on Southampton Way, Parkhouse Street and new residential units on the site, and which would be insignificant for properties on Wells Way and Cottage Green. Officers note that construction would be a temporary process. Within the completed development, effect interactions at locations along Southampton Way, Parkhouse Street and Wells Way as a result of daylight / sunlight and air quality would range from minor to major adverse. Air quality effects would not have any material implication on residential amenity, and so the over riding consideration is in relation to daylight and sunlight and this is considered in detail in the amenity section of this report.
114. The overall conclusion of the ES is that during demolition and construction the likely significant adverse effects would relate to noise which would be moderate adverse and temporary in duration. For the completed development there would be significant adverse effects relating to daylight and sunlight. The completed development would have significant beneficial effects in relation to the provision of new homes, increased local spending, wind microclimate, townscape settings and visual effects.

Design, including building heights and impacts of tall buildings on local views

115. The proposal is for a comprehensive redevelopment of the site, with new buildings ranging from 2-12 storeys in height. These would be arranged around a new central street which would run north-south and east-west across the site together with a mews street, focussed around the retained brick chimney. The development is generally arranged with employment space on the ground floors and residential above, except for block A which would be entirely residential.
116. Section 12 of the NPPF 'Achieving well-designed places' advises that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development which creates better places in which to live and work. Policy 7.4 of the London Plan requires development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area. Policies 7.4 and 7.5 are also relevant which require

developments to provide high quality public realm and architecture, and policy which 7.7 relates to the location and design of tall and large buildings.

117. 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 3.12 ‘Quality in design’ of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. When we consider the quality of a design we look broadly at the fabric, geometry and function of the proposal as they are bound together in the overall concept for the design. Saved policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This 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. Saved policy 3.18 of the Southwark Plan requires to the setting of conservation areas, listed buildings and world heritage sites to be preserved.
118. Objections have been received relating to the height of the proposed development including lack of justification for tall buildings on the site, impact upon the local character, and impact upon surrounding conservation areas and listed buildings.
119. The proposal involves the development of an existing light industrial site bordered to the north by Burgess Park. The site and the surrounding industrial sites are predominantly characterised by mid 20th Century metal and brick clad industrial warehouses and areas of car parking accessed from Parkhouse Street, which is one-way from east to west. On the application site there are 3-storey brick former office buildings which appear to date from the 1980s.
120. The surrounding streets are predominantly residential in character and include the Elmington area leading up to Camberwell Road around 300m to the west of the site. The nearest commercial frontage is on Southampton Way which is the main road leading from Camberwell Road to Peckham Road.

Urban Design and arrangement

121. The proposal seeks to transform the site into a new mixed-use quarter by introducing a new L-shaped route across the centre of the site. A small square of around 220sqm is proposed where the two parts of the L-shaped route would meet. This route has been inspired by the retained chimney stack which becomes an ordering device around which the entire development has been arranged. To the north of Parkhouse Street and approaching Burgess Park the route would reduce in scale and would provide gated access to proposed blocks A and B. A condition is recommended requiring the gates to be removed in the event that a new entrance to Burgess Park is required at this location in the future. The proposed layout would also allow for a new route through the site onto Southampton Way should this be required in the future, between proposed blocks E and J.



Entrance to central street

122. The development would be made up of a number of separate parts, all of which would work together to define this new mixed-use quarter and give the area a sense of place. These include:
- The Parkhouse Street block at the centre;
 - The Wells Way edge and route to the south;
 - The Parkhouse street edge and route to the west; and
 - The mews houses and Burgess Park edge to the north.
123. Each part would be further broken up into separate buildings to reflect the urban pattern of the area. For example, on Wells Way and the western end of Parkhouse Street the proposal is for a repeating pattern of low blocks to emulate the terraced properties nearby. At the centre of the site the buildings are proposed to become larger and take the form of modern warehouse-type buildings. In this way the urban design has responded to its urban setting, reflecting its industrial heritage in a modern way.
124. Overall, the proposed routes through the site and layout of buildings around them are considered to be logical and well structured. The new routes would be well integrated with both Parkhouse Street and Wells Way, with the potential to connect to Burgess Park and Southampton Way in the future. The potential route to Southampton Way would be just south of Chiswell Street on the opposite side of Southampton Way, which the NSP supports a connection with.

Height, Scale and Massing

125. The buildings on the streets surrounding the site are generally low-rise. There are 2-storey residential and commercial buildings on Parkhouse Street, 2-storey residential buildings on Wells Way opposite the site, and commercial and residential buildings ranging from 2-5 storeys high on Southampton Way. The buildings within the proposed development would range from 2 to 12-storeys, and would therefore appear markedly taller than their surroundings.
126. In policy terms, tall buildings are defined as those which are over 30m in height. There would be two tall buildings at the centre of the site, blocks I and J which would be 12 and 11 storeys high respectively. Blocks F and H would also technically be tall buildings because with the lift overruns included they would exceed 30m; the main bulk of these buildings would be 30m however. Saved policy 3.20 of the Southwark Plan requires all tall buildings among other things: to be located at a point of landmark significance, to be of exceptional quality of design, to make a positive contribution to the landscape, to relate well to their surroundings, and to contribute positively to the London skyline.
127. The approach to the height and massing of the proposed development has been influenced by a number of key principles arising from the urban setting, primarily the proximity of Burgess Park to the north, and the need to conserve or enhance nearby heritage assets (this is considered separately below). As a result height has been introduced carefully, starting low at the edge of the park with 2-storey mews houses, rising at the centre of the site.



Showing distribution of height across the site.

128. Given the proximity to the park and the sensitive relationship with the terrace of dwellings at 1-13 Parkhouse Street it is considered appropriate to limit the height of block A to 2-storeys. An extension to an existing building to form block B would result in a 5-storey structure, although the upper floors would be set back and the new 3-storey shoulder height would not represent a significant jump in scale in the streetscene relative to the adjacent terrace.
129. Building heights along Parkhouse Street would range from 3-9-storeys. The 3-storey building (block C) would be located opposite 1-13 Parkhouse Street and would not represent a significant increase in scale relative to the neighbouring buildings. The blocks would step up in height either side of the northern entrance to the new central street, marking and defining this new route which is considered to be appropriate. The blocks on the remainder of Parkhouse Street (blocks G and H) would be 6-8-storeys high, with the top two floors set back resulting in a six-storey shoulder height. This is a reduction in height from the 7-9 storeys shown on the plans as originally submitted, and given their setbacks from the site boundary and gaps between the buildings they are considered to be acceptable.
130. Building heights fronting Wells Way would range from 4-6 storeys. The taller building (block L) would mark the entrance to the new central street and is considered to be appropriate. Block M which would run parallel with Wells Way would step down to 4-storeys in height, emulating the reduction in height at the edge of the site which would take place next to Burgess Park.
131. The tallest buildings would be located towards the centre of the site which is considered to be appropriate. The tallest, block I, would be centred on the new public square, marking the point at which the central street would change direction. This is considered to be an appropriate location for a tall building as the square would become a point of landmark significance. The tall buildings at the centre of the site would comply with the Council's tall buildings policies; they would be located at the centre of the site and at the focus of the proposed new routes, would be elegant in design, and would contribute positively to the local skyline and the surrounding streets.



Showing tower and square.

Architectural Design

132. The Council's policies reflect the requirements of the NPPF and require buildings to be designed to respond to the area's defining characteristics. Good architectural design includes buildings finished in high quality materials that are built to last and reflect the local character, and they should be well composed with a clear sense of order and geometry.
133. The architectural design of the proposal is inspired by the warehouse aesthetic typical of Southwark's industrial heritage, as well as the mansion block typology which is prevalent in the area - a good example being the nearby Evelina Mansions. These buildings are characterised by their simply ordered brick-clad facades with deep-set multi-paned openings offset with metal-framed balconies. The main buildings within the proposed development are designed with robust, brick-framed bases and main body up to the 'shoulder' height, whilst the set-back upper storeys would be finished in a light-weight metal cladding which would be consistent with the character of the area and would give the development a high degree of interest and variety. Between the main blocks there would be smaller 'linking' blocks, with a more simple façade and typically stepping down and set-back from the building line. These linking blocks would give the streetscene a sense of continuity and enclosure and would help to break up the scale of the development into a series of identifiable building units.



Showing elevations

134. The tall buildings are designed as individual pieces focussed on the small public square at the centre of the site. The lower tower would rise to 11 storeys and would be consistent with its neighbouring buildings up to its 9-storey 'shoulder' height, with set-back metal-clad upper storeys. The primary tower would be the 12-storey building at the centre of the site which is designed with a clearly defined base, middle and top. The base would be a large, columned space which would include a double height commercial unit identified as a potential microbrewery with ancillary tap room facing directly onto the public square. It would have a strong geometric brick frame and a distinctive chamfered edge facing the square. At the top of the building the three uppermost floors would be expressed as a simple grid visible from the nearby streets, expressing the architectural qualities of what would be a distinctive tower seen in the round.
135. The architectural design is considered to be well thought out, high quality, and highly articulated. By introducing routes into and across the site and a new public space the proposal would transform this industrial site into a vibrant and attractive mixed-use quarter. The quality of architectural design would rely to a large degree on the quality of architectural detailing used in the construction of the development, especially for the tall buildings. Conditions requiring mock-ups of the cladding, material samples and a scheme for the restoration of the retained chimney stack would be required, and these have been included in the draft recommendation.

Comments of the Design Review Panel (DRP)

136. The scheme was reviewed by the Southwark DRP in July and October 2017 at pre-

application stage. The Panel were not able to endorse the height of the proposed development which at the time included a 14-storey tower at the centre of the site and a general height of around 9-storeys. As a result of the views of the panel the design was fundamentally revised, reducing the height of the tower, introducing a greater variety of building heights, especially at the edges along Parkhouse Street, and the provision of a new route from Parkhouse Street. Notwithstanding this, the scale of development has remained consistent at around residential 500 units.

137. In conclusion, the proposal is considered to be an elegant reinvention of this industrial site, successfully merging light-industrial and other commercial uses with new residential accommodation in a well structured urban pattern. The architectural design would be highly articulated and contextual, drawing on the heritage of the area.

Heritage assets

138. The site does not include any listed buildings and is not in a conservation area. However, there are a number of listed buildings nearby and the site has a direct relationship with Burgess Park to the north.
139. The nearest listed buildings include the grade II listed Collingwood House on Cottage Green, Nos 73,75 and 77 Southampton Way, and No 113 Wells Way. Slightly further away is the grade II listed former Church of St George, the spire of which is visible from a number of vantage points within Burgess Park – the impact upon the setting of these listed buildings are considered below. The nearest conservation area is the Addington Square Conservation Area to the west of the site. However, given the scale of the proposed development it would have no impact on its setting. At the centre of the site is a large chimney stack - a historic remnant of the industrial heritage of the site. It is considered that this is an undesignated heritage asset which would be preserved by the proposed development.
140. The Council's policies echo the requirements of the NPPF in respect of heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm. Where there is harm to a heritage asset the NPPF requires the Council to ascertain the scale and degree of the harm caused and to balance that against the public benefits arising as a consequence of the proposal.
141. An important influencing factor for the height and massing of the proposal has been the townscape view from the main east-west path in Burgess Park which focuses on the spire of the grade II listed former Church of St George which is a recognisable local landmark. Objections received following public consultation on the application raise concerns regarding the impact upon this heritage asset.
142. The massing proposed on the site has been carefully arranged to try to avoid causing a harmful impact on this designated heritage asset, retaining its primacy in the local views. This has meant that on Parkhouse Street the buildings would be limited to a 'shoulder' height of 6 and 7 storeys with set-back upper floors, whilst at the centre of the site the proposed buildings arranged around the 12-storey tower would rise to 8 and 9 storeys at the 'shoulder' with set-back upper storeys to the south.
143. In so far as the new buildings would appear over the mature tree-lined edge of the park relative to the spire of the listed former church, it is considered that some harm would arise to the setting of this important heritage asset. The harm is considered to

be at the lowest order of 'less than substantial' harm as defined by paragraph 193 of the NPPF. In such cases paragraph 196 of the NPPF requires the Local Planning Authority to consider the harm in the context of the significance of the heritage asset balanced against the public benefits arising from the development, and where the harm cannot be justified by the public benefits the proposal should be refused. In this case the harm is considered to be 'less than substantial', especially when considered proportionately i.e. affecting a heritage asset listed at grade II.

144. The townscape views submitted with the application demonstrate that the proposed buildings would not interact with the significant features of the spire, with the spire retaining its primacy in the park path view with the 12-storey tower receding away from the heritage asset as one approaches it from the east. In considering the limited harm caused by the new development, it is appropriate to consider whether this harm would be outweighed by the public benefits arising from the development including:

- The redevelopment of the site;
- the new publicly accessible areas - the new routes and public space;
- the undesignated heritage asset of the chimney which would be preserved; and
- the new housing including affordable housing to be provided by the development.

145. Taking all of the public benefits into account in the balance against the less than substantial harm to the setting of the former church, it is considered that the harm would be outweighed by the public benefits and the impact on the setting of the church would be justified.



Showing relationship with church spire.

146. Information submitted with the application demonstrates that the 11-storey tower (block J) would be visible in part over the rooftop of the Grade II Listed Collingwood House on Cottage Green when viewed obliquely from the corner with Southampton Way. This is an oblique view of the heritage asset and largely dominated by the light-industrial streetscene of Southampton Way. The view demonstrates that as the viewer moves along Cottage Green and closer to the front of the heritage asset where its architectural and historic significance as well as its setting can be appreciated, the new building would recede away and to the right. As the setting of Collingwood House would be preserved, it is considered the proposal would not cause harm to the heritage asset or its setting. As above, where it may be considered that there is harm

to a heritage asset it has to be balanced against the public benefits of the proposal. In the case of Collingwood House, it is considered that there would be no harm.

147. Proposed block J would appear in the background above the listed buildings at 73-77 (odds) Southampton Way. The proposed building would be set sufficiently far back from these properties to appear in the distant backdrop without causing any harm to their setting.
148. Concerns have been raised during public consultation on the application that the townscape assessment does not consider the impact upon the Victorian terrace at 1-13 Parkhouse Street. Whilst this is an attractive terrace, it is fairly typical of Victorian properties, and the height of the proposal relative to this terrace has been considered in the design section above and is considered to be acceptable.
149. In conclusion, whilst there would be some less than substantial harm to the setting of the listed former church, this is considered to be justified given the wider benefits of the proposal. Officers therefore consider that the proposal would comply with the relevant design policies and the NPPF.

Density

150. Based on the Southwark Plan methodology for mixed-use developments, the density of the proposed development would equate to 1,415 habitable rooms per hectare. Neighbouring residents have raised concerns that the proposal would exceed density ranges set out in planning policy and that this is not justified because the site is not in an opportunity area or an action area core, and that the revisions to the proposal have resulted in an increased density.
151. The site is within in the Urban Density Zone and has a public transport accessibility level (PTAL) of 2 (low). Table 3.2 of the London Plan would therefore support a density of 200-450 habitable rooms per hectare in this location.
152. With regard to Southwark policy, strategic policy 5 of the Core Strategy expects residential developments in the urban density zone to fall within the range of 200-700 habitable rooms per hectare. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes, and requires areas of non-residential space to be divided by 27.5 to create an equivalent number of habitable rooms per hectare.
153. The Council's Residential Design Standards SPD requires accommodation to be of an exemplary standard where density ranges would be exceeded. The proposal would result in a good standard of accommodation, although not all aspects of the housing could be described as 'exemplary' – this is assessed further later in the report in the 'Quality of accommodation' section. It is considered that the proposal would be of an appropriate height and set within an acceptable amount of public realm, and the quantum of development would allow the provision of affordable housing to be maximised. Although there would be adverse impacts upon daylight and sunlight to neighbouring properties, this must be weighed in the balance with all of the benefits arising from the scheme. When all of the benefits and disbenefits are taken into account, it is not considered that exceeding the density threshold would warrant withholding permission in this instance.
154. It is noted that policy D6 of the draft London Plan requires development proposals to

make the most efficient use of land, to be developed at the optimum density. The draft policy places less emphasis on density thresholds, and more emphasis on good design.

Affordable housing

155. The proposed development would deliver a policy compliant level of affordable housing comprising 35% overall, with a tenure split of 70% social rented and 30% intermediate.
156. Section 5 of the NPPF sets out the government’s approach to the delivery of significant new housing including a plan-led approach based on a sound evidence base, and policy 3.3 of the London Plan supports the provision of a range of housing types. It sets the borough a minimum target of 27,362 new homes between 2015-2025. Strategic policy 5 of the Core Strategy reinforces the London Plan policy, and requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. Core Strategy SP6 requires that developments with 10 or more units should provide a minimum of 35% affordable housing, subject to viability. Saved policy 4.4 of the Southwark Plan requires an affordable housing tenure split of 70% social rented and 30% intermediate units in this location.
157. The proposed development would deliver 35% affordable housing by habitable room, which would equate to 173 affordable units. With regard to tenure split, 70% of the units would be social rented and 30% would be intermediate. The mix of affordable units would comprise 63% 2+ bed units and 20% 3+ bed units. The affordable units would be located within blocks C, D, E and M.

Unit Type	Private (units)	Affordable Housing (units)		Total
		Social Rent	Intermediate	
Studio	23	0	0	23
1 bed	113	41	24	178
2 bed	121	44	30	195
3 bed	69	34	0	103
Total	326	119	54	499

158. For affordable housing purposes there would be 557 affordable habitable rooms within the development, comprising 389 social rented (70%) and 168 intermediate (30%).

Viability

159. The application is accompanied by a viability appraisal which has been independently reviewed by GVA on behalf of the Council. As set out above in relation to land uses,

the viability of various options have been assessed to test the impact that increasing the amount of commercial floorspace within the development would have on the quantum of affordable housing which could be delivered.

160. The proposed affordable housing offer would be policy compliant and would also exceed the level which the Financial Viability Appraisal submitted with the application suggests could be supported. The delivery of the affordable housing would be secured within a s106 agreement.

Mix of dwellings

161. The proposed development would be policy compliant in terms of its unit mix with no more than 5% studio units which would all be private, 60% 2+ bed units and 21% 3+ bed units.
162. Policy 3.8 of the London Plan 'Housing choice' requires new developments to offer a range of housing choices in terms of the mix, housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these. Strategic policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% of the units with two or more bedrooms, at least 20% of the units with three or more bedrooms, and no more than 5% studio units which can only be for private housing. The proposal would deliver the following mix of units:
163. The proposal would deliver the following mix of units:

Mix	Units	%
Studio	23	4.6%
1-bed	178	35.7%
2-bed	195	39.1%
3-bed	103	20.6%
Total	499	100%

Wheelchair accessible housing

164. Policy 3.8 of the London Plan 'Housing choice' requires ninety percent of new housing to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings', and ten per cent of new housing to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. Designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
165. The proposal would deliver 90% of the units to M4 (2) standard and 10% to M4(3) which would comply with the London Plan, and a condition to secure this is recommended.

Quality of accommodation

166. Policy 3.5 of the London Plan requires housing developments to be of the highest quality internally, externally, and in relation to their context and to the wider environment. They should enhance the quality of local places, incorporate requirements for accessibility and adaptability, and minimum space standards. In

terms of Southwark policy, saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. The Council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels, and units should be dual aspect to allow for good levels of light, outlook and cross-ventilation.

Suitability of the site for residential use

167. Chapter 8 of the ES 'Noise and vibration' considers whether noise levels at the site are such that it would be suitable for residential use. There are a number of industrial uses adjoining and close to the site and the proposal would introduce a significant number of new residential occupiers in close proximity to these industrial uses. It is noted that there are already residential uses around the site and numbers 45, 47 and 73 Southampton Way adjoin industrial premises.
168. The ES advises that short and long-term noise monitoring was undertaken at seven locations on and around the site. Concerns have been raised by a neighbouring resident that the noise monitoring locations do not take into account that the Babcock Depot at 25-33 Southampton Way operates 24/7. The depot is used for MOTs and vehicle repairs, and work is carried out on police cars and motorcycles from this depot. In response to this issue, the Council's Environmental Protection Team (EPT) understand that whilst vehicles may be dropped off at the site throughout the night and day, testing and repairs only takes place during the day and the Council has not received any noise complaints from existing residential occupiers in relation to this use. The applicant's acoustic consultant has advised that two noise monitoring locations on Parkhouse Street would have picked up noise from these premises in any event, including 24 hour use of the depot.
169. The ES advises that the proposed residential units facing the scaffolding yard would be most likely to be affected by high levels of noise when the yard is operational, followed by units fronting Wells Way and Parkhouse Street. The scaffold yard office is open 8am to 5pm Monday to Friday, and the yard itself is used from 7am until around 6pm during the week and sometimes opens on Saturday mornings until lunchtime / early afternoon. With regard to external amenity space, again the balconies and terraces closest to the scaffold yard would experience high levels of noise when the yard is in operation, and noise experienced at the other amenity spaces within the development would fall within acceptable limits.
170. The ES therefore recommends that mitigation be required. EPT has recommended a number of conditions to ensure that noise levels within the dwellings would fall within acceptable limits and these have been included in the draft recommendation. It is noted that the ES concludes that air quality within the completed development would be acceptable and would not adversely impact upon future occupiers.

Privacy

171. The Council's Residential Design Standards SPD recommends a minimum of 21m between the rear elevation of properties and 12m distance between properties that face one another, including across a highway.
172. No windows are shown in the eastern elevation of proposed block A, therefore there would be no direct overlooking between blocks A and B. There would be a minimum of 14m across the central street which would exceed the 12m minimum recommended in

the Residential Design Standards SPD where properties face each other.

173. There would be some instances of closer relationships however. There would only be 9m between some windows in blocks E and J, 6m between some windows in blocks F and G, 7m between some windows in blocks G and I, and some close relationships at the inward facing corners of blocks H and L. A condition is therefore recommended requiring obscure glazing or other privacy devices to prevent direct views between the affected units, and this should not significantly affect the quality or usability of the accommodation.

Aspect and outlook

174. The majority of the units (67%) would be dual or triple aspect. Of the single aspect units, none would be north-facing.
175. A number of the proposed buildings would be in close proximity to existing buildings which would impact upon outlook to the windows. These are set out below:

Block B

176. This existing building adjoins a 2-storey Council-owned building at 21-23 Parkhouse Street. Block B would be extended and converted, and at first floor level new balconies would be provided which would extend right up to the boundary with the adjoining building, with the balconies looking out onto the flank wall of number 21-23. At second and third floor levels new balconies would be a minimum of 1.5m back from the boundary, and windows would be provided on the boundary. So as not to compromise the development potential of this adjoining site it is recommended that a condition requires the windows obscure glazed and non-opening. A planning application was submitted to redevelop this adjoining site which showed new buildings pulled back from the site boundary to provide a new route alongside proposed block B, although it is noted that the application has recently been withdrawn.

Block C

177. This would have deck access to the rear which would be close to existing residential accommodation at the rear of 47 Southampton Way. The deck would need to incorporate lightweight screening to prevent loss of privacy and to provide outlook for the proposed units.

Blocks D and E

178. These blocks which would contain residential accommodation from first floor level upwards would include residential windows located 5m and 2m respectively off the boundary with 49-65 Southampton Way. This adjoining site is currently being redeveloped by Big Yellow to provide a new self-storage facility and office space.
179. With the Big Yellow development in place there would be a minimum of 8.5m between this new building and windows within block D, and a minimum of 5.2m for block E, both of which would be quite close relationships affecting the first three floors of residential accommodation. The affected units would all be dual or triple aspect however.

Blocks J and K

180. Balconies to proposed block J would be located a minimum of 7m off the boundary with a church at 9-11 Cottage Green. The church forms part of a mixed use development including office space, training facilities and recording studios which was granted consent in 2009 (reference: 08-AP-1476). It is permitted to open from 8am to 8pm Monday to Friday, 9am to 10pm on Saturday and 10am to 5pm on Sunday. The main part of the building is 2-storeys fronting Cottage Green, and it drops down in height at the rear where it extends right up to the site boundary, as does the existing building immediately adjoining part of the application site.
181. The block J balconies would face a small hospitality suite at the rear of the church which has no windows facing the application site. As such this relationship is considered to be acceptable. As stated, conditions have been included in the draft recommendation to ensure that the noise levels within the flats would fall within acceptable levels. If the church site ever came forward for redevelopment in the future, any residential building on it could be set a similar distance from the boundary. As such it is not considered that the proposal would unduly hinder redevelopment potential of the church site.
182. Block J would also be located 1.5m off the boundary with the scaffold yard, and concerns have been raised during public consultation that windows shown in its side elevation overlooking the yard would adversely affect the redevelopment potential of this adjoining site; the plans show that the windows would serve kitchens, bathrooms and secondary living room windows. Given this close relationship a condition is recommended requiring revised elevations and floorplans for this part of the block either showing the windows removed, or showing them as obscure glazed up to 1.8m high and top opening only.

Block M

183. The units in the southern section of proposed block M would be located just 1m off the boundary with an adjoining site at the rear. The adjoining site currently contains an open yard but has materials stacked to a high level along the site boundary. If this situation continues these units would have a limited level of outlook, although they would be dual or triple aspect, with duplex units spanning the ground and first floor levels.
184. Given this close relationship and so as not to unduly compromise the redevelopment potential of the adjoining site, a condition is recommended requiring the southern-most units in this terrace, at all floors of the building, to have their rear windows obscure-glazed up to 1.8m within the room and top-opening only.

Unit sizes

Units	SPD minimum sqm	Overall unit size (minimum) sqm	SPD minimum sqm	Amenity space sqm (minimum)
Studio	39 (37 with shower room)	39 (37 with shower room)	10	6.2
1-bed	50	50	10	4.5
2-bed	61-70	62	10	3.5
3-bed flats	74-95	86	10	7.2
3-bed duplexes or houses	84-102	87 (block A) 99 (block M)	50 10	45.8 11.2

185. All of the residential units would meet or exceed the minimum overall floorspace requirements set out in the Nationally Described Space Standards. Some of the individual rooms and storage spaces would fall short of the standards set out in the Residential Design Standards SPD however, with shortfalls ranging from 0.1-3.8sqm. As the overall unit sizes would comply with the required standards, this is considered to be acceptable.

Internal light levels

186. A Daylight Assessment based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. For Annual Probable Sunlight Hours (APSH) the BRE guidance notes that the main requirement for sunlight is in livingrooms, and recommends that they receive at least 25% of the total annual total, 5% of which should be received during the winter months. Given that the results would improve higher up the buildings, only residential accommodation at ground to third floor level has been tested.
187. Of the 698 rooms tested, 545 (78%) would comply with the BRE guidance in relation to ADF. All of the rooms tested within proposed blocks A and C would comply with the guidance, and only one room within block B and one within block J would not comply; the affected rooms would serve an open plan living space in block B with an ADF of 1.33% and a lounge / diner in block J which would have an ADF of 1.46%.

Amenity space

188. Section 3 of the Residential Design Standards SPD sets out the council's amenity space requirements for residential developments. New houses should have a minimum of 50sqm of private garden space which should be at least 10m in length and extend across the full width of the dwelling. Flats should meet the following minimum standards and seek to exceed these where possible:

50sqm communal amenity space per development;

For units containing three or more bedrooms, 10sqm of private amenity space;

For units containing two or less bedrooms, 10sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity

space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement; Balconies, terraces and roof gardens must be a minimum of 3sqm to count towards private amenity space.

189. 461 of the residential units (92%) would have access to private amenity space, although not all of the flats would have the required 10sqm, and two of the five houses would not have the required 50sqm (it is also noted that owing to the constrained nature of the northern part of the site the gardens to the block A houses would not be 10m in length – a minimum depth of 2-4m is proposed). Overall there would be a shortfall of 168sqm of private amenity space across the development which takes into account both the flats and the houses. There would also be 44 x 3+ bed units which would have less than 10sqm of private amenity space, with the lowest provision being 7.2sqm. It is noted that the 8% of units which would not have any private amenity space would all exceed the minimum standards in terms of overall unit size.
190. The SPD allows any shortfall in private amenity space to be made up for in the communal provision, and as 850sqm of communal amenity space would be provided throughout the development the shortfall would be met on site. It is noted that blocks A and C would not have their own communal space therefore residents of these blocks would need to be able to access communal space elsewhere within the development, and a condition requiring details of how this would be achieved has been included in the draft recommendation.
191. Overshadowing to the communal amenity spaces has been assessed, together with the front gardens to the block A houses and the back gardens to the block M duplexes. The BRE advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21 March.
192. The communal spaces for blocks B, D/E, J/K, L/M and two private gardens to block M would all comply with the BRE guidance. The private gardens to blocks A and two of the block M units together with communal terraces for blocks F/G and H/I would not comply with the BRE guidance, with areas receiving at least two hours of sun on the ground ranging from 0% (blocks F/G, H/I) to 45% (block M). For the same test in June, taking into account the summer months when people are more likely to use their gardens, all but the block H/I amenity space would comply. For block H/I only 8% of the amenity space would receive more than 2 hours of sun on the ground, although it is noted that this would be linked by a footbridge to sunnier space at blocks F/G. Whilst it is noted that not all of the amenity space would comply with the BRE guidance in March, on balance this is considered to be acceptable given that most of the spaces would comply during the summer months.

Childrens' playspace

193. Using the play space calculator contained within the Mayor's Play and Informal Recreation SPG the proposed development would require the following amount of childrens' playspace:

810 sqm for under 5s
500 sqm for 5-11 year olds
290 sqm for 12+ year olds.

194. The proposal would provide 780sqm of playspace for the 0-5 age group which would be located in block E, the podium gardens between blocks F, G, H and I, and block L; a condition would be necessary to ensure that residents of all blocks would have access to childrens' playspace. There would be a shortfall of 820sqm of playspace on the site therefore a contribution of £123,820 would be required towards the 5-11 and 12+ provision which has been calculated in accordance with the Council's Adopted Planning Obligations and CIL SPD. Consideration has been given as to whether any playspace could be provided on the northern part of the site, but the applicant has advised that this would not be possible because the space is required for vehicle movements. The site adjoins Burgess Park which contains a range of facilities including an equipped playground, tennis courts and a BMX track.
195. To conclude, overall it is considered that good quality accommodation would be provided, with all of the units meeting or exceeding the Nationally Described Space Standards, and the majority of the units would receive good levels of internal daylight and would be dual or triple aspect. Whilst there would be some instances where the proposal would not comply with the Council's guidance in relation to room sizes and amenity space, these are not considered to be significant and would not warrant withholding permission.

Trees and landscaping

196. The scheme would require the removal of 9 existing trees, but 39 new trees would be planted resulting in an overall increase in canopy cover. This would be supplemented by other new landscaping which would improve biodiversity at the site.
197. An Arboricultural Survey and Impact Assessment has been submitted with the application and updated following the revisions to the scheme. There Arboricultural report advises that there are currently 13 individual trees and one group of trees on the site comprising 9 category B (moderate quality), 4 category C (low quality) and one category U (unsuitable for retention) trees and these are predominantly located around the edges of the site. It is noted however, that the group of trees (G1) and tree 1 (T1) are actually located within Burgess Park. There is a large London Plane on Parkhouse Street which is not within the site and is protected by Tree Preservation Order number 86B.
198. A total of 9 trees would need to be removed from the site in order to facilitate the development, comprising 5 category Bs, three category Cs and one category U. 39 new trees would be planted throughout the site, including along Parkhouse Street, Wells Way and the new central street, and the revisions to the scheme included amendments to some of the building footprints to allow sufficient space for the new trees to thrive. The proposal would result in a net increase in tree canopy cover, which is welcomed. Conditions are recommended to secure the new planting and to protect the retained trees during construction, including the off-site TPO tree which the arboricultural report notes could be affected, most likely through the repaving of the footway. A clause should be included in the s106 agreement requiring a contribution of £6k per tree if it transpires following further site investigations that any of the new trees cannot be planted.
199. Discussions have taken place with the Council's Parks and Open Spaces Team regarding proposed blocks A and B. Park trees are not currently trimmed back if they are close to residential properties. It is noted that new accommodation would be provided in an existing building to form block B close to existing trees, but the flats

would be dual aspect in any event. The Parks and Open Spaces Team has requested a 2.4m high solid boundary treatment along the park boundary next to block A, and this would be secured by way of a condition.

Landscaping

200. The proposed buildings would be set within a high quality landscaping scheme which would incorporate new public routes through the site, and this is considered to be a positive aspect of the proposal. The new public spaces would comprise the central street, the mews street leading from Parkhouse Street, and a small public square in front of the 12-storey tower which could be used for events such as markets. It is intended that the central street would be predominantly for pedestrians, with only around eight servicing vehicles using it on days when refuse would be collected, and fewer vehicles on other days. It would incorporate an activity strip down the middle which would allow for spill-out spaces and 'garden rooms' incorporating external seating for the commercial units which would line the route. The existing brick chimney would be retained as a feature in the site which is welcomed, and new tree planting would be provided. It is recommended that a condition requiring a detailed landscaping plan be imposed upon any forthcoming planning permission, and as stated, a clause inserted in the s106 agreement requiring public access to be maintained through the site.

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

201. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work; saved policy 3.2 of the Southwark Plan states that permission will not be granted for development where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
202. A development of the size and scale proposed would have impacts upon the amenities of the occupiers of properties both adjoining and in the vicinity of the site. The application is accompanied by an Environmental Statement (ES) in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The ES deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts would amount to such significant harm as to justify the refusal of planning permission.
203. Concerns have been raised by neighbouring residents including daylight / sunlight impacts, loss of privacy, and noise and disturbance.

Impact of the proposed uses

204. The proposed uses within the development would comprise Class A1-A4, B1 D2 and residential. Class B1 (business and office) uses generally sit comfortably near to residential properties, and the scale of the Class A (retail) and Class D (leisure) uses would not result in any significant loss of amenity. It is recommended that the opening hours of the Class A and D uses be limited to 7am to 11pm daily by way of a condition. Conditions are also recommended limiting servicing hours and plant noise

from the development.

205. Saved policy 3.11 (iv) of the Southwark Plan 'Efficient use of land' advises that proposals should not unreasonably compromise the development potential of, or legitimate activities on, neighbouring sites. The proposed development would introduce a significant quantum of residential properties in close proximity to existing industrial uses and this has been considered in detail in the quality of accommodation section of the report, as it would have implications for both existing neighbouring uses and future occupiers. Conditions have been included in the draft recommendation to ensure that the proposed dwellings would be adequately sound-proofed which would reduce the likelihood of noise complaints against existing businesses. Although in draft form it is noted that the site designation within the NSP is for this local preferred industrial location to change to a mixed-use neighbourhood, including residential use.

Privacy and overlooking

206. Southampton Way – There would be a window-to-window separation distance of 15-17m between first floor windows in the side elevation of proposed block A and windows at the rear of 29 and 31 Southampton Way. A condition for obscure glazing is therefore recommended.
207. Block C would contain a balcony directly facing 45 Southampton Way which would need to be screened to prevent any loss of privacy. As stated block C would also contain windows and a walkway on its rear elevation facing the residential and live/work units at the rear of 47 Southampton Way and the separation distance would be a minimum of 4.5m. A condition is therefore recommended requiring details of screening to be submitted for approval.
208. Windows in the side elevation of block J would be at least 30m from existing rear windows at 73-79 Southampton Way and as such no loss of privacy would occur.

1-13 Parkhouse Street

209. There would be a minimum separation distance of 16.1m between the rear of these properties and the houses in proposed block A. The ground floor windows would not cause any direct overlooking due to existing boundary treatment at the rear of the Parkhouse Street terrace, although there could be oblique views looking up towards upper floor windows. The two terraces of houses would face each other across a new access road and the Residential Design Standards SPD recommends a separation distance of at least 12m to maintain privacy. However, it is noted that this would be a new road, and the houses currently back onto an open yard. Block A would include small corner windows at first floor level serving bedrooms, although their primary aspect would be towards the rear of the more distant properties on Southampton Way. A condition requiring the portion of the corner window facing the Parkhouse Street terrace to be obscure glazed up to 1.8m within the room has been included in the draft recommendation in any event, to ensure that there would be no loss of privacy.



Section showing block a and 1-13 Parkhouse Street

210. The existing commercial building which would be converted to include residential accommodation in proposed block B already contains ground and first floor windows in its side elevation facing 13 Parkhouse Street, with the ground floor windows at a high level within the room. These windows are 7m away from windows in the flank elevation of 13 Parkhouse Street, across the existing access road. The first floor windows would serve residential accommodation as a result of the proposal, and new windows and balconies would be added through the extension to the building. A condition requiring privacy screens is therefore recommended, which could direct views towards Parkhouse Street or Burgess Park, and away from number 13.

Wells Way

211. There would be a minimum of 15m between windows within the proposed development and the properties on Wells Way. This would exceed the 12m recommended in the Residential Design Standards SPD where properties face each other across a street.

Cottage Green

212. The closest property on Cottage Green would be approximately 55m from windows at the rear of proposed block J and as such no loss of privacy would occur.

Daylight, sunlight and overshadowing

213. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the BRE guidance on daylight and sunlight. The following tests have been undertaken:
214. Vertical Sky Component (VSC) is the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.
215. No-Sky Line (NSL) is the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20% reduction). This is also known as daylight distribution.
216. Sunlight - Annual Probable Sunlight Hours (APSH). This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.
217. The ES describes the impacts upon VSC, NSL and APSH as follows:

Reduction	Level of impact
0-20%	Very low (negligible effect)
20.1-30%	Low (minor effect)
30.1%-40%	Medium (moderate effect)
40.1%+	High (major effect)

218. The ES considers the impact on the following neighbouring buildings:
- 1-6, 79, 1-12 (these are the listed buildings at 73, 75 and 77 Southampton Way), 33-47 (odds) Southampton Way
 - 1-13 (odds) Parkhouse Street
 - 77-115 (odds) Wells Way
 - 1-3 Cottage Green (Collingwood House)
 - 8-14 (evens) Cottage Green
219. The impact upon these properties has been assessed in relation to the completed development which would be the worst case scenario and as such the ES does not consider daylight and sunlight impacts during construction.
220. The daylight report considers a large number of rooms around the site. For VSC, of the 310 windows tested, 223 (72%) would comply with the BRE guidance and as such would experience a negligible effect. For NSL, of the 218 rooms tested, 159 (73%) would comply with the BRE guidance, and for APSH of the 119 windows tested, 112 (94%) would comply with the BRE guidance.

Southampton Way

221. The properties on Southampton Way are located to the north-west and south-west of the application site. All of the windows for all but one of the properties tested would comply with the BRE guidance in relation to VSC.
222. At 47 Southampton Way 15 windows would comply with the BRE guidance on VSC and 12 would not. This property is one half of an attractive semi-detached pair which has been converted into four flats. It also has a 2-storey building at the rear, and the planning history suggests that it contains two live/work units on the ground floor and two residential units above, all granted under Lawful Development Certificates. The ground floor live / work units are likely to have a very poor quality outlook because they are single aspect facing onto the existing single-storey car wash building within the application site which extends right up to the boundary with number 47. The first floor residential accommodation looks out over the roof of the car wash and as such has a good level of outlook across Parkhouse Street.
223. Proposed block C would be 3-storeys high and would be located directly in front of these live/work and residential windows. Although it would be located 3-7m away from this neighbouring building, its increased height would have a significant adverse effect upon daylight and outlook to these windows, with one window experiencing a moderate adverse effect and 11 windows experiencing a major adverse effect. The moderate and major effects would range from 39% to 79% reductions in VSC and at least 9 of these windows are likely to serve habitable accommodation. The affected windows would have VSCs ranging from 4.63% (reduced from 11.99%) to 15.33 (reduced from 25.21).
224. For NSL, 82% of the windows tested would comply with the BRE guidance and 18% (14 rooms) would not, with four properties affected. Of these, two rooms would experience minor effects, 4 would experience moderate effects, and 8 would experience major effects. Most of the windows affected would be within the accommodation at the rear of 47 Southampton Way described above, where 8 windows would experience major effects, and the moderate and major effect reductions would range from 27% to 81%.
225. The significant adverse effects upon the two residential properties and two live / work units at the rear of 47 Southampton Way are noted. This harm must be weighed in the balance with all of the benefits and disbenefits of the proposal, and in this instance given the significant amount of good quality new residential accommodation which would be provided, including 35% affordable housing, officers consider that the benefits would outweigh the harm cause to these four existing units.

Parkhouse Street

226. This terrace of 7 buildings contains flats on the ground floor and flats and maisonettes above. With the exception of number 13, the amendments to the proposal have improved the daylight situation to the Parkhouse Street terrace compared to the original submission, resulting in an additional 13 windows complying with the BRE guidance. Of the 79 windows tested for VSC, 46 (58%) would comply with the BRE guidance and 33 (42%) would not comply, with 8 windows experiencing a minor effect, 21 experiencing a moderate effect, and 4 experiencing a major effect. For the windows experiencing moderate and major effects the VSC reductions would range

from 32% to 51%. For 1-11 Parkhouse Street the affected windows would all be at the front of the buildings, and they would have retained VSCs ranging from 17.45% to 22.53% as a result of the proposal.

227. The impacts upon 13 Parkhouse Street would be greater, and whilst the amendments to the proposal have resulted in two rear windows complying the BRE guidance where previously they would not have, there would now be four windows which would experience major effects whereas previously there were only three. At the front of number 13 the retained VSCs would range from 16.54% to 25.60%, and all of the windows at the rear would comply with the BRE guidance. The significant impacts would be to the windows at the side of the property. The layout of the upper floor maisonette is not known, but at ground floor level the side windows serve a bedroom and a dining room. The retained VSC for the bedroom would be 8.22% and to the dining room it would be 6.58%, although this room is served by another window which faces down the rear garden. The first floor side windows would have retained VSCs of 11.93% and 15.08%, and another would comply with the BRE guidance
228. For NSL, of the 53 rooms tested 41 (77%) would comply with the BRE guidance and 12 (23%) would not, with one window experiencing a minor effect, 9 experiencing a moderate effect, and two experiencing a major effect. The moderate and major effects would be reductions ranging from 36% to 63%.
229. Whilst the changes to the proposal have resulted in some improvements to daylight at to number 13, to some windows the impact would be worsened. The changes would however result in a much better outlook from this property, which under the previous plans would have been almost completely surrounded by new buildings in close proximity. The previous plans showed block A as 3-storeys high and constructed right at the end of the Parkhouse Street rear gardens. The front part of block B would have been attached to the flank wall of number 13 and the back part of it would have joined up with block A, creating a continuous block immediately at the rear of the Parkhouse Street terrace. There would however, have been a gap between the front and back parts of block B which would have allowed more light to the side windows in number 13.
230. The current proposal is considered to be a much more neighbourly relationship, with block A reduced in height and set back from the rear gardens of the existing terrace increasing the separation distances from a minimum of 9.9m to between 16.1m – 24.6m when measured from the back of the outriggers to the Parkhouse Street properties. Although an existing building would be extended upwards to form block B, the existing 7m wide gap between it and the flank elevation of number 13 would be maintained.

Wells Way

231. These properties are located to the east of the application site, on the eastern side of Wells Way. Of the 67 windows tested for VSC, 25 (37%) would comply with the BRE guidance and 42 (63%) would not, with 5 windows experiencing a minor effect, 20 experiencing a moderate effect, and 17 experiencing a major effect. For the windows experiencing moderate and major effects the VSC reductions would range from 31% to 50%, with resultant VSCs ranging from 17.23% to 26.11%.
232. For NSL, of the 50 rooms tested, 17 (34%) would comply with the BRE guidance and 33 (66%) would not, with 10 windows experiencing a minor effect, 6 experiencing a

moderate effect, and 17 experiencing a major effect. The moderate and major effects would be reductions ranging from 32% to 69%.

233. Whilst the major effects to these properties are noted, this is partly because some of them sit opposite part of the application site which contains a low-rise building of less than 2-storeys in height and an open area of parking, therefore some of the existing properties have very high existing VSCs up to 37.68%.

1-3 (Collingwood House) and 8-14 Cottage Green

234. For VSC and NSL all of the windows tested would comply with the BRE guidance.

Sunlight

235. All of the properties tested on Southampton Way, Parkhouse Street and Cottage Green would comply with the BRE guidance relating to APSH.

236. On Wells Way, of the 67 windows tested, 60 (90%) would comply with the BRE guidance and 7 (10%) would not. Of these, one window would experience a minor effect, one would experience a moderate effect, and 5 would experience major effects. The moderate and major effects would experience percentage reductions in their APSH ranging from 32% to 74%, with resultant APSHs ranging from 7% to 24%. Whilst these impacts are noted, this is considered to be acceptable when weighed in the balance with the other benefits arising from the proposal.

Overshadowing

237. As stated the BRE guidance advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21st March. If the area receiving 2 hours sunlight is reduced by more than 20% it is considered that the change may be noticeable. The ES tests the impacts upon the gardens to 1-13 Parkhouse Street which would comply with the BRE guidance.

238. Following concerns from neighbouring residents that the gardens to the Wells Way properties had not been subject to this test, the applicant has submitted an additional drawing which shows that the impacts would comply with the BRE guidance. The gardens to properties on Southampton Way and Cottage Green have not been tested owing to their orientation relative to and distance from the site, which means that they would not experience any overshadowing.

239. Transient overshadowing drawings have also been submitted which demonstrate that there would be some additional shadowing onto Burgess Park between 9am and 1pm on March 21st. The affected area is heavily treed, and the Council's Ecology Officer has reviewed the application and has not raised any concerns regarding the proposal.

Light pollution

240. Lighting for the proposed development would include lighting poles to the primary public realm, to the buildings along the Mews, and existing street lighting along Parkhouse Street which would be retained or replaced (details to be secured through the s106 agreement). A compliance condition to ensure that the lighting would not cause any loss of amenity to neighbouring occupiers or harm to bats has been included in the draft recommendation, on the advice of the Council's Ecology Officer.

Conclusion on amenity impacts

241. To conclude, it is recognised that there would be some adverse impacts upon some of the neighbouring residential properties in terms of daylight and sunlight, and whilst the revisions to the proposal have resulted in improvements for some properties, impacts would be more significant for others. Along Wells Way the impacts are in part owing to an existing low-rise building and open areas of parking on the part of the site which sit opposite these residential properties. However, for the most part the retained VSCs would be reasonably high, and consistent with other schemes within the urban density zone.
242. Daylight and sunlight is only one element of amenity, and the existing neighbouring buildings would benefit from improved outlook over well-designed new buildings rather than the existing, rather run down industrial estate. They would also benefit from access to the proposed retail and leisure space within the development. The daylight and sunlight impacts must be weighed in the balance with all of the other positive and negative impacts of the proposal and given the significant positive impacts which would arise, officers consider that the benefits would outweigh the harm in this instance, and that impact upon amenity would not be sufficient to withhold planning permission.

Noise and vibration

243. Noise and vibration is considered in chapter 8 of the ES, which considers impacts from demolition and construction activities and from the completed and operational development. Concerns have been raised by neighbouring residents regarding noise and disturbance during construction, and from the completed development.

Demolition and construction

244. The ES predicts that demolition and construction work would result in adverse, major, short-term local impacts upon the surrounding properties on Southampton Way, Parkhouse Street, Wells Way and Cottage Green. Regarding vibration, the ES predicts that the impacts would range from negligible to short-term, major adverse effects but would not be of a magnitude that would cause any damage to buildings. The ES recommends that a construction management plan be required, and in consultation with the Environmental Protection Team a condition to secure this has been included in the draft recommendation.

Completed development

245. The suitability of the site for residential use and necessary mitigation has been considered in the 'Quality of accommodation' section of this report. Noise from the completed development would emanate from plant, the proposed commercial uses and servicing activities, and conditions to address these issues have been included in the draft recommendation. With mitigation measures in place the ES predicts that there would be no likely significant effects in relation to noise and vibration.

Transport issues

246. The proposed development would incorporate 15 accessible parking spaces at various locations across the site. Servicing would take place from within the site,

including from a yard area accessed through block L, and from the central and mews streets. The proposal would result in additional vehicle trips, details of which are set out below, but these would not have an adverse impact on the highway network. Neighbouring residents have raised a number of transport related concerns including lack of car and cycle parking, impact upon public transport, and increased traffic on the surrounding roads.

247. Strategic policy 2 of the Core Strategy 'Sustainable transport' advises that the Council will encourage walking, cycling and the use of public transport rather than travel by car. Saved policy 5.1 of the Southwark Plan seeks to ensure that development is located near transport nodes, and saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; saved policy 5.3 requires that the needs of pedestrians and cyclists to be considered and saved policy 5.6 establishes maximum parking standards. Traffic and transport is considered in chapter 7 of the ES and an addendum to the Transport Assessment.
248. The site has a public transport accessibility level (PTAL) of 2 (low) and is within the East Camberwell Controlled Parking Zone (CPZ). It is approximately 480 metres and 2.4km (westerly) to the bus routes on the A215 Camberwell Road and Elephant and Castle train/tube station respectively, and there is a bus stop outside the site on Wells Way serving routes 343 and 136.

Demolition and construction

249. The ES predicts that during the peak construction period in 2019 there would be 20 construction vehicles per hour, 10 going into the site and 10 coming out, and a maximum of 100 vehicle movements per day (50 vehicles in and 50 vehicles out); there would be a general policy of not providing any parking for construction workers. This would represent a reduction in vehicle movements compared to the existing usage of the site, although there would be an increase in the number of Heavy Goods Vehicles (HGVs). The highest increase would be along Wells Way which could experience 75 2-way HGV movements per day, but the ES predicts that this would have no impact on pedestrians. An outline construction logistics plan has been provided, but a condition for detailed construction management plan has been included in the draft recommendation which would consider issues such as vehicle routing and delivery times. With mitigation in place the ES predicts that there would be no significant transport impacts during demolition and construction.

Completed development

250. Access and servicing arrangements - The proposed central street would operate as a one-way system westbound, exiting back onto Parkhouse Street which is one-way from east to west. It would predominantly be used by pedestrians and cyclists, together with refuse vehicles and for some deliveries. Vehicle access would be managed by a site management team and automatic drop bollards connected to the site management via intercom would be provided at the site entrances on Parkhouse Street and Wells Way.
251. Servicing for the proposed commercial units would predominantly take place from two yards at the rears of blocks C and J which would be able to accommodate 5.3m long vans and from the new mews street, and this would be overseen by the site management. Approximately eight servicing vehicles would use the central street on days when refuse would be collected, and fewer vehicles on other days, allowing it to

remain as predominantly pedestrian. The TA advises that most residential deliveries would take place outside of peak hours and could be accommodated within the proposed yards, and there would be a 24/7 concierge who could take receipt of deliveries on behalf of residents and place them in a store room for collection.

252. With the exception of block A, each block would have its own refuse store; bins for the block A houses would be transferred to the block B bin store by the site management. Refuse would be collected from the stores on Parkhouse Street and the new central street and a condition securing the provision of the refuse stores is recommended, together with a condition for a detailed servicing and delivery management plan and a s106 obligation for a servicing bond.

Trip generation

253. The ES predicts that the completed development would result a small reduction in vehicle trips compared to the existing situation. However, officers consider that vehicle trips would increase. Officers' own assessment suggests that there would be 80 and 106 two-way vehicle movements in the morning and evening peak hours respectively which includes servicing trips, and when compared with the observed vehicular traffic at the site means that it would create 44 and 63 additional two-way vehicle movements in the morning and evening peak hours. However, even taking into account likely vehicle movements from other committed developments in this locality it is considered that these would not have any noticeable adverse impact on existing vehicular traffic on the surrounding roads.

Parking

254. There are currently around 50 car parking spaces within the main part of the site, and the area at the rear of 1-13 Parkhouse Street was formerly used for minibus parking. There would be 15 accessible parking spaces provided on the site which would be located next to blocks A and B and at the rear of block J. This would equate to 3% provision and concerns have been raised by neighbouring residents that the proposed level of parking would be insufficient.
255. The CPZ controls on-street parking in the vicinity of the site on weekdays from 0830hrs to 1830hrs. Although the proposed level of car parking would be minimal, the proposal would deliver two car club spaces together with three years membership for every eligible adult within the development which should be secured within the s106 agreement. As set out below, a contribution to increase bus capacity would be provided if overcrowding occurs, and future occupiers of the development would be prevented from obtaining parking permits in the CPZ. The on-site parking spaces would have electric vehicle charging points in accordance with the London Plan and a condition to secure this is recommended.

Pedestrians and cyclists

Pedestrians

256. Following consultations with the Council's Highways Development Management Team and Transport for London (TfL) a number of highway measures would be required in order to provide a safe pedestrian environment within and surrounding the site. This includes the provision of a pedestrian crossing on Wells Way, a raised table on Parkhouse Street, the repaving of the footways around the site, and a widened

pavement along Wells Way. The required servicing management plan which would be secured by way of a condition would deal with how pedestrians, cyclists and vehicles within the site would be managed to minimise any conflict, including restricting the hours during which servicing vehicles could use the central street and the provision of retractable bollards at the site entrances to prevent unauthorised access.

Cyclists

257. The current London Plan requires 846 long-stay and 33 short-stay cycle parking spaces to serve the development. The proposal would exceed this by providing 862 long-stay and 34 short-stay spaces at various locations across the site. With the exception of block A each block would have its own dedicated cycle store, and additional spaces would be provided in the public realm. The cycle parking would be a mix of Sheffield stands and stacked units and a condition requiring full details is recommended, which should include details of block A cycle parking and provision for cargo bikes and bikes adapted for mobility aids. It is noted that TfL has requested that cycle parking in line with the more onerous standards in the draft London Plan be provided, but this would require a significant amount of additional space.
258. A revised comment from TfL has been submitted requesting a contribution of £150k for the delivery of a cycle hire docking station for 18 bikes in the vicinity of the site, and this has been included in the draft s106 agreement.
259. Concerns have been raised by neighbouring residents that the proposal would remove an existing cycle lane along Wells Way. Whilst it is not shown on the drawings, it is not proposed to remove the cycle lane.

Impact on public transport

260. The Transport Assessment (TA) estimates that the proposal would result in 142 and 120 two-way public transport trips in the morning and evening peaks hours respectively, which would be similar to the 130 and 118 existing trips. However, officers consider that public transport trips would be significantly higher than this, with 245 trips in the morning and evening peaks respectively, equating to increases of 89% and 108%. Concerns have been raised by neighbouring residents that this would make the busses overcrowded, and that the transport information contained in the TA is out of date because it is based on data from the last census which was in 2011.
261. The impact on buses falls within the remit of TfL which has reviewed the application and advised that it is not clear whether there would be bus capacity issues, owing to changes linked to the Old Kent Road Opportunity Area and mitigation already secured through other developments. TfL has therefore requested a contribution of £90k if there is overcrowding on the local bus network within the first two years of occupation or occupation of 300 homes (whichever is sooner), and this would be secured through the s106 agreement. TfL has used bus capacity data from July 2017 to inform their advice.
262. The ES predicts that the completed development would have a negligible impact upon London Underground and National Rail services.
263. In relation to traffic and transport the ES concludes that there would be no significant effects. Although it is considered that the proposal would result in an increase in vehicle and public transport trips to and from the site, officers concur with this overall

conclusion.

Air quality

264. The site sits within an air quality management area. Policy 7.14 of the London Plan 'Improving Air Quality' seeks to minimise the impact of development on air quality, and sets a number of requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality. A number of neighbouring residents have raised impacts upon air quality as a concern following public consultation on the application, including why no monitoring has been undertaken on Parkhouse Street. EPT has advised that with the exception of uses which generate emissions, such as incinerators, there is no agreed protocol for measuring air quality at specific sites, and that air quality assessments use information from air quality measuring stations which are at various locations across the borough.
265. The impact upon air quality is considered in chapter 9 of the ES. It considers impacts upon surrounding receptors, together with impacts upon future occupiers of the site.

Demolition and construction

266. Demolition and construction activities could result in dust which would impact upon air quality. Measures to reduce this would be secured in a construction management plan including the damping down of highways and the use of wheel washing facilities and a condition for a construction management plan has been included in the draft recommendation. The ES concludes that subject to mitigation measures, the demolition and construction impacts would not result in any significant air quality effects.

Completed development

267. The ES advises that the main air quality impacts upon existing occupiers and future occupiers of the proposed development would be from road traffic and plant emissions, although it notes that traffic on the surrounding roads would decrease as a result of the development which would improve air quality. The ES therefore concludes that the completed development would not result in any significant air quality effects to existing receptors and that air quality for future residents within the development would be acceptable.
268. Although officers consider that vehicle trips from the proposed would be higher than existing, with the higher trip rates factored in, the proposal would be air quality neutral.
269. EPT has reviewed the application and concur with the findings of the air quality assessment contained within the Environmental Statement, and concur that the proposal would not cause any exceedances of the air quality objectives and that no mitigation measures are required for the completed development.

Ground conditions and contamination

270. Policy 5.21 of the London Plan advises that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.

271. An Environmental Risk Assessment report has been submitted which advises that contamination is likely to be present on the site owing to its existing industrial nature and historical uses. The report has been reviewed by EPT and Environment Agency, both of which recommend a condition for further contamination investigations and remediation.
272. The area was extensively bombed during WWII therefore the potential exists for unexploded ordnance (UXO) to be found during construction works. The submission advises that a watching brief for UXO would be maintained during excavation works and an informative to this effect is recommended.

Flood risk

273. Policy 5.13 of the London Plan advises that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water runoff is managed as close to its source as possible. A Flood Risk Assessment (FRA) and Outline Surface Water Drainage Strategy have been submitted with the application, together with a basement impact assessment and basement construction method statement; it is noted however, that following the revisions to the scheme a basement is no longer proposed. Neighbouring residents have raised concerns regarding the long term viability of the proposal given that the site is located in a flood risk zone, lack of sewerage capacity, and that drainage on Wells Way is insufficient.
274. The site is located in flood zone 3 which is identified as having a high risk of flooding. The NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. However, the Council's Strategic Flood Risk Assessment acknowledges that development within flood zone 3 is required, and is allowed with the application of the Exception Test set out the NPPF.
275. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and that a site-specific flood risk assessment must demonstrate that no adverse impacts would occur.
276. The site is located on previously developed land and there are strong sustainability reasons why it should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall of housing. The proposed design is capable of providing good quality housing, with much of the development containing less vulnerable commercial space at ground floor level. It is also noted that the site is a proposal site in the draft NSP, which anticipates business and residential development.
277. The FRA advises that the majority of the site has a very low risk of surface water flooding, and Wells Way and Parkhouse Street have areas of medium and high risk of surface water flooding. With regard to ground water, it advises that the overall ground water flood risk for the development would be low. The FRA advises that finished floor levels would be raised 300mm above the existing ground, and the site management would sign up to the Environment Agency's flood warning service.
278. The application has been reviewed by the Environment Agency, Thames Water and

the Council's Flood Risk and Drainage Team, and a number of conditions and informatives are recommended. Runoff rates would be limited to the equivalent greenfield rates.

Sustainable development implications

279. 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. It states that where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of onsite renewable technologies, where feasible. Of note is that residential buildings must now be carbon zero, and non-domestic buildings must comply with the Building Regulations in terms of their carbon dioxide emissions.
280. The applicant has submitted an Energy Statement in support of the application based on the Mayor's energy hierarchy, and which has been updated to reflect the changes to the scheme.
281. Be lean - Measures under this category would include high levels of insulation and air tightness and would result in a 13.63% carbon dioxide reduction when compared with a scheme compliant with the Building Regulations.
282. Be clean – The previous version of the proposal included a basement which would have accommodated combined heat and power (CHP) plant. Following the revisions to the proposal and omission of the basement, CHP is no longer considered feasible. There are no planned district heating networks in this area, therefore no carbon dioxide emissions savings would be achieved under this category. However, the s106 agreement would require the development to be future-proofed for connection in the event that a network were to come online.
283. Be green - Photovoltaic panels would be provided which would result in a 25.19% carbon dioxide reduction when compared with a scheme compliant with the Building Regulations.
284. A combination of the above measures would result in a 35.38% reduction in carbon dioxide emissions when compared with a scheme compliant with the Building Regulations. This would equate to a 37.33% reduction for the residential element and a 26.74% reduction for the commercial element. A contribution of £90k towards the Council's Carbon Off-set Green Fund is therefore required, and would be secured through the s106 agreement. It is recommended that the carbon savings be reviewed post-construction, which may require an adjustment to the s106 contribution amount.
285. Southwark's strategic policy 13 of the Core Strategy 'High environmental standards' requires developments to meet the highest possible environmental standards, and sets the following targets relevant to the application:
 - Community facilities should include at least BREEAM 'very good';
 - All other non-residential development should achieve at least BREEAM 'excellent';

- Major developments should achieve a 44% saving in carbon dioxide emissions above the building regulations from energy efficiency, efficient energy supply and renewable energy generation;
- Major development must achieve a reduction in carbon dioxide of 20% from using onsite or local low and zero carbon sources of energy;
- Major housing developments must achieve a potable water use target of 105 litres per person per day.

286. The submission advises that the A and B class floorspace would achieve the required BREEAM 'excellent'. The score for the D class floorspace is not stated, therefore a condition is recommended requiring it to achieve at least 'very good'. The development would achieve a 25.19% reduction in carbon dioxide emissions through the use of renewable energy, and the residential component would achieve a potable water use target of 105 litres per person per day.

Overheating

287. An Overheating Mitigation Strategy has been submitted which advises that factors such as building orientations, glazing ratios and window operability have been taken into account when considering the potential risk of overheating. The commercial units would require mechanical ventilation, and a condition is recommended requiring details to be submitted for approval.

Conclusion to sustainability implications

288. Saved policy 3.3 of the Southwark Plan advises that planning permission will not be granted for major development unless the applicant demonstrates that the economic, environmental and social impacts of the proposal have been addressed through a sustainability assessment; the applicant has submitted a Sustainability Statement to address this requirement. These issues are also considered in a number of the other planning application documents including the ES, the Equalities Statement and the Energy Strategy.

289. The proposed development would generate a significant number of construction jobs and the construction process would give rise to expenditure in the local economy. It is estimated that 255 jobs would be created in the completed development which would contribute to the local economy. Assistance would be provided to the Continental Car Wash which would be displaced as a result of the proposal, and affordable workspace would be provided in the completed development. A significant amount of new housing including 35% affordable housing would be provided, and borough CIL contributions would be secured to contribute towards the infrastructure required to support growth. Measures to reduce carbon dioxide emissions would be incorporated into the scheme.

Archaeology

290. Policy 7.8 of the London Plan advises that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. Saved policy 3.19 of the Southwark Plan is also relevant,

which sets out the Council's approach to protecting and preserving archaeology within the borough.

291. The site does not lie in a Council designated Archaeological Priority Zone (APZ), but current guidance from Historic England advises that all major planning applications on sites over 0.5 hectares - whether in an APZ or not - should be considered for archaeological interest.
292. An initial appraisal indicates that there is little available data on the potential for significant early archaeological remains to survive on the site. An archaeological Desk Based Assessment submitted with the application advises that a watching brief should be undertaken and works monitored during construction. However, given that the archaeological potential of the site is unknown, it is recommended that a detailed archaeological evaluation be carried out and conditions to secure this have been included in the draft recommendation. An archaeological monitoring contribution of £11,171 is also required, and this should be secured through the s106 agreement.

Wind microclimate

293. This issue is covered in chapter 11 of the ES which considers the likely wind conditions as a result of the proposed development, and the suitability of those conditions for pedestrian comfort. It considers the completed development only, and not the demolition and construction phase. It is noted that there would be hoarding around the site during construction works in any event.

Completed development

294. Within the completed development wind conditions at ground level would be acceptable for sitting to strolling and with the exception of four private balconies, wind conditions within the private and communal amenity space would be acceptable; a condition is recommended requiring solid balustrades for the four balconies which would bring wind conditions to acceptable levels.

Ecology

295. Policy 7.19 of the London Plan 'Biodiversity and access to nature' requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity wherever possible. Saved policy 3.28 of the Southwark Plan states that the Local Planning Authority will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, and will require an ecological assessment where relevant. A preliminary ecological appraisal and bat presence survey have been submitted in support of the application.
296. The site is not subject to any ecological designations, but the northern part of the site adjoins Burgess Park which is a Site of Importance for Nature Conservation (SINC). The part of the park which immediately adjoins the site is known as the Nature Area and has recently undergone an extensive enhancement project as part of the phased work of the Burgess Park Master Plan. It is not however, designated as a Local Nature Reserve.
297. The assessments undertaken show that the application site has a limited ecological value, although the removal of shrubs and trees should take place outside of the

nesting bird season and an informative to this effect is recommended. The ecological appraisal advises that the site has low potential to support roosting bats and recommends that additional emergency / re-entry survey work be carried out for 45 Southampton Way. This has been undertaken and no bats were seen emerging from the building, although the site is used as a bat commuting route.

298. The application has been reviewed by the Council's Ecology Officer who has advised that the surveys are acceptable, and that no further surveys are required. No objections have been raised by Natural England. Details of the boundary treatment with Burgess Park are required, and this could be secured by way of a condition. It is noted that the Bat Presence report recommends a native hedge along this boundary, but the Parks and Open Spaces Team requires the boundary treatment to be solid. There are trees within the park which are close to the boundary, therefore care would need to be taken not to damage them when constructing the boundary treatment. Bats are known to use Burgess Park therefore any external lighting from the development would need to be controlled by way of a condition to ensure that it would not have any adverse impacts upon bats.
299. Through the provision of new planting and amenity areas the proposal has the potential to improve biodiversity at the site. Conditions to secure this including for landscaping details, brown roofs, bat boxes and bird bricks together with measures to deal with Japanese Knotweed at the site have been included in the draft recommendation.

Socio-economic impacts and health

300. This is considered in chapter 6 of the ES. Concerns have been raised regarding pressure on local services as a result of the proposal.

Demolition and construction

301. The ES predicts that there would be 435 construction workers on the site over the course of the 3 year construction period. It predicts that these construction workers would spend approximately £1.8m in the local area during the course of the construction period. The ES advises that the construction phase of the development could increase trips to hospital A&E departments by 0.005% which would be a minor adverse impact.

Completed development

302. The completed development would support approximately 255 jobs, significantly more than existing, and the new resident population is predicted to result in £6.4m of expenditure in the local area per year; the proposal would contribute almost a fifth of the borough's annual housing target, albeit delivered over a 3 year build period.
303. With regard to impacts upon services, the ES advises that the completed development could increase trips to Accident and Emergency by less 0.15%. With regard to GP provision, there are currently 23 surgeries within a mile of the site supported by 97 doctors, and all are accepting new patients. The Department for Health recommends a target patient list size of 1,800 patients per GP, and the average across the 23 surgeries is 1, 622. If all the people working and living at the site used the existing local GP surgeries, which is unlikely, this would increase to 1, 666, which would be within the recommended list size.

304. With regard to education, the ES advises that early years provision is constrained and the development would pose an additional burden on this. It advises that this would have a long term, adverse effect of minor scale at the local level, but that the effect would not be significant. The ES advises that there would be sufficient capacity to accommodate children within the proposed development requiring primary, secondary and further education. The ES concludes that the only significant effects would be a moderate, beneficial, long term effect on housing provision at a borough level and on the local economy through increased spending in the local area.

Planning obligations (S.106 undertaking or agreement)

305. Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the council's adopted Planning Obligations and Community Infrastructure Levy SPD.

306. The following would be required and would be secured through the s106 agreement:

Financial contributions

Topic	Contribution
Loss of B class floorspace contribution	£84,349
Childrens' playspace contribution	£123,820
Cycle hire docking station contribution	£150k
Bus contribution if overcrowding occurs	£90k
Carbon Off-set Green Fund contribution	£90k
Archaeology contribution	£11,171
Contribution towards countdown facilities for bus stop on Wells Way (unless already provided by the Big Yellow Development)	£40k
Affordable housing monitoring fee	£22,922.50
Servicing bond contribution	£25,390
TOTAL	£637,652.50
S106 monitoring contribution (2% of total - to be adjusted if bus count down facilities provided by another development)	£12,753.05
GRAND TOTAL	£650,405.55

Non-financial obligations

- 307.
- Employment during construction and in the completed development provisions;
 - Delivery of the commercial space before a proportion of the residential space can be occupied;
 - The appointment of a workspace provider for the affordable workspace;
 - Estate management strategy;
 - Commercial units management plan;
 - Provision of affordable workspace;
 - Assistance for the Continental Car Wash to find a new site should they wish;

- Terms to assist Swiss Postal to relocate within the development should they wish;
- Public access through the site;
- Provision of affordable housing;
- Parking permit exemption;
- District heating future proofing provisions;
- Provision of 2 car club spaces and 3 years membership for each eligible resident within the development and each business;
- Tree contribution of £6K per tree for any proposed tree which cannot be planted on the site;
- Post-construction review of carbon dioxide savings.

308. Highway works which would be delivered through a s278 agreement comprising:

- Improvements to the junction of Wells Way with Parkhouse Street to enable it to accommodate HGVs;
- Resurface the carriageway of Parkhouse Street from its junction with Wells Way to its junction with Southampton Way.
- Re-paving the footways on Parkhouse Street and Wells Way with the widened Wells Way footway to be adopted;
- Planting of new trees on the highway;
- Speed cushions outside no.37 Parkhouse Street to be removed and a raised carpet installed at the proposed Mews junction with Parkhouse Street;
- Speed cushions outside 5 Parkhouse Street to be converted to a traffic carpet;
- Provision of new drainage gullies on Parkhouse Street where traffic carpets are introduced;
- Upgrade the street lighting on Parkhouse Street to reflect the changed highway layout and in line with current standards;
- Provision of a pedestrian crossing on Wells Way.

309. In the event that a satisfactory legal agreement has not been entered into by 27th May 2019 it is recommended that the Director of Planning be authorised to refuse planning permission, if appropriate, for the following reason:

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

Community infrastructure Levy (CIL)

310. 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.

311. 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 to support growth. In this instance a Mayoral CIL payment (pre-affordable housing relief) of £1,855,605.06 and a Southwark CIL payment of £2,143,478.89 would be required.

Statement of community involvement

312. A Statement of Community Involvement (SCI) has been submitted with the application which sets out consultation on the proposal which was undertaken by the developer before the planning application was submitted. Approximately 5,200 newsletters were sent to local residents and businesses, advising them of the proposals and upcoming consultation events. Meetings were held with 11 local groups / representatives including some of the Parkhouse Street residents, Wells Way Triangle Residents' Association and Friends of Burgess Park. Two workshop sessions were held on 15th and 17th June 2017 which were attended by approximately 70 people over the two days and a public exhibition was held at the site on 12th and 13th December 2017 which was attended by 32 people. A dedicated email address and telephone line were set up during the public consultation to respond to any enquiries.
313. Feedback received included support for the concept of redeveloping the site and the provision of new creative / maker space within the development, together with support for the provision of new public realm and space which could be used by the community. Concerns raised included the height and density of the proposal, assurance that affordable housing would be provided, noise and disturbance from the commercial space and during construction, lack of parking, flood risk, and impact upon public transport and public services. There were mixed views regarding a proposed route from the site to Burgess Park.
314. A number of amendments were subsequently made to the proposal including a reduction in the height of the block I tower from 18 to 14-storeys, increased affordable housing, and a reduction in building heights next to Burgess Park. Further changes have been made following the submission of the planning application and the block I tower would now be 12-storeys.

Other matters

315. A Structural Feasibility Report has been submitted in support of the application which considers the way in which the development would be constructed. Officers note that detailed construction matters are dealt with under the Building Regulations.

Conclusion on planning issues

316. The proposal would bring about the regeneration and beneficial re-use of an aging industrial estate, most of which is currently vacant and some of which has been vacant for more than a decade. Whilst it would result in an overall reduction in employment floorspace, the refurbished and redeveloped space would be of a much higher quality, able to attract a wider range of occupiers and support higher employment density. It has the potential to deliver 255 jobs within the completed development, and the applicant is in negotiations with specialist workspace providers to manage affordable workspace which would be provided on the site. It has been demonstrated that a higher amount of commercial floorspace within the development would significantly affect viability, and would affect the amount of affordable housing which could be provided. Given the location of the site, away from a town centre or transport node and given the residential character of the wider area, this is considered to be

acceptable. The development also includes an element of retail space which would serve new and existing local residents and help to attract people to the site.

317. There is a pressing need for housing in the borough and the scheme would deliver 499 new homes, including a policy compliant amount of family housing and 173 affordable housing units; this would equate to 35% affordable housing by habitable room, with a policy compliant tenure split of social rented and intermediate accommodation.
318. The inclusion of housing, retail and community uses on the site is a departure from saved Southwark Plan policy 1.2 relating to preferred industrial areas. This must be weighed against the wider benefits of the scheme, and with regard to the emerging policy within the draft NSP which proposes a change from an industrial use at the site to a mixed-use employment and residential neighbourhood. It is not considered that approval of this application would undermine the future of the PIL, or the emergence of policies within the draft NSP.
319. The design would be of a high quality, reflecting the industrial heritage of the area and retaining an existing brick chimney stack which would act as a focus for the new routes across the site. The proposed new routes would be high quality and predominantly for pedestrians, and would introduce permeability across the site with the potential to connect to Southampton Way and Burgess Park in the future if required. Whilst there would be some harm to the setting of the listed former Church of St George, this is considered to be less than substantial harm which would be outweighed by the wider benefits of the proposal. These benefits need to be weighed against the localised adverse impacts including an equality issue relating to the loss of the car wash, impacts during construction, and impacts upon daylight and sunlight to neighbouring properties. The impact upon four units at the rear of 47 Southampton Way are noted together with impacts upon windows in the side elevation of 13 Parkhouse Street, although there would be some benefit to their outlook due to the removal of the poor quality existing structures. In light of the wider public benefits of the scheme it is considered that on balance, these benefits would outweigh harm to local amenity.
320. Officers have assessed the conclusions of the submitted Environmental Statement, and a number of conditions have been included in the draft recommendation to secure appropriate mitigation. Subject to a s106 agreement and conditions, it is recommended that planning permission be granted following referral to the Mayor of London and the Secretary of State.

Community impact statement

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

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

Consultations

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

Consultation replies

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

Summary of consultation responses

324. **Flood and Drainage Team** - Conditions for a flood evacuation plan, Basement Impact Assessment and detailed drainage strategy are required. Flood adaptation, resistance and resilience measures should be identified and implemented.

325. **Subsequent response** – Conditions recommended. Would meet greenfield run-off rates.

326. **Environmental Protection Team** - Approval with conditions. EPT has reviewed the air quality assessment contained within the Environmental.

327. Statement and concur that the Proposed Development will not cause any exceedances of the air quality objectives and that no mitigation measures are required for the Proposed Development.

328. Ecology Officer

- Surveys acceptable and no further surveys required.
- The proposal should offer a biodiversity gain which complements Burgess Park.
- Confirmation of the boundary with Burgess Park is required;
- Brown roofs should be provided under all of the PVs.
- Conditions required to deal with Japanese Knotweed, to secure bat boxes and bird bricks, and to ensure that the lighting would not cause any harm to bats.

329. Local Economy Team

- No information in the submission about the displacement of existing businesses.
- A loss of B class floorspace contribution is required.
- Jobs targets provided.
- Require a business units management plan and affordable workspace.

Parks and Open Spaces Team

330. Object to the application as follows:

- A 1.5m high fence and native hedge (on the park side) next to blocks A and B would not be acceptable. Recommend a 2.5m high fence. No hedge should be planted on the park side owing to maintenance issues. As this part of the Park is being developed into a Nature reserve area, vehicular access for the developers would not be easily

accessible.

Highways Development Management

331. Approval subject to s278 agreement to secure a range of highway improvements, plus minor modifications to the plans.

Greater London Authority

332. Land use principles: The site is a Locally Significant Industrial Site (LSIS). The scale of industrial floorspace loss is contrary to London Plan Policy 4.4, draft London Plan Policies E4, E6, the adopted local plan and the emerging local plan site allocation. The scale of loss is unacceptable and the re-provision of industrial floorspace (B1c/B2/B8) must be increased.
333. Affordable housing: The scheme proposes 35% affordable housing (by habitable room). The provision falls below the 50% threshold for LSIS set out within Policy H6 of the draft London Plan, and a late stage review mechanism should be secured, alongside the early review. The viability is currently being examined to ensure the offer is the maximum reasonable amount.
334. Urban design: The site layout is supported. There are residential quality issues which should be addressed, particularly the relationship between Blocks I and H. A management plan should be secured for this high density development. Verified views are required to assess the proposal's impact upon London Panorama 1A.2.
335. **Officer response** – the viewing plane is set at 52.1m AOD. The tallest building on the site would be 41.95m AOD and as such would sit well below the viewing plane.
336. **Transport:** TfL will be seeking proportionate contributions towards buses, cycle hire scheme and Legible London signage.
337. **Transport for London (TfL)**
- Support car-free development; future residents should be prevented from obtaining parking permits;
 - Accessible parking would comply with the draft London Plan (2017) but a plan showing up to 10% provision should be provided which could be on-street;
 - Parking should not be for specific units, but allocated on a flexible basis with no long term leasing and not be available to non Blue Badge holders;
 - Unclear if there would be bus capacity issues, due to changes linked to the Old Kent Road Opportunity Area and mitigation already secured through other developments. Contribution of £90k required if there is overcrowding within the first two years of occupation or occupation of 300 homes (whichever is sooner).
 - Contribution of £150k required towards a new cycle hire docking station
 - A detailed breakdown of the proposed long and short stay cycle parking is required based on the draft 2017 London Plan;
 - A range of cycle parking options should be provided;
 - No vehicle through-route across the public realm within the site should be permitted, but they should be accessible to cyclists and pedestrians 24/7;
 - New / updated wayfinding and signage should be provided;
 - Footways along Parkhouse Street and Cottage Green should be improved;
 - Contribution of £15k required for signage at the site boundary and to update existing

signage at other key locations;

- Servicing strategy appears acceptable;
- Should consider changes to the junctions from Parkhouse Street and Wells Way;
- Different paving within the site could make the development appear inward facing;
- Blank wall on Wells Way which would reduce the amount of useable footway.
- Plans omit bus shelter on Wells Way and show residential entrance and bin store instead which should be moved.
- Building at junction with Parkhouse Street could lead to a narrow and cluttered footway (2m minimum is required);
- Should consider better crossing facility on Wells Way, funded by the developer;
- Residential deliveries would be accepted by a concierge and this should include the affordable units;
- Measures to reduce servicing trips through a servicing and delivery management plan should be secured;
- A detailed construction management plan should be secured;
- Details of how the whole development would be managed once constructed should be provided;
- Travel plan should be improved and cycling target increased.
- The proposal requires a Mayoral CIL payment.

338. **Subsequent response** (additional comments)

- Draft London Plan cycle parking requirements not met;
- Further justification for cycle hire docking station provided.

339. **Thames Water** - No objections regarding sewerage infrastructure capacity. conditions and informatives recommended.

340. **London Fire and Emergency Planning Authority** - An undertaking should be given that access for fire appliances as required by Part B5 of the current Building Regulations Approved Document B and adequate water supplies for fire fighting purposes, will be provided.

341. **Officer response** - the applicant has confirmed that access for fire appliances would be provided, and that a fire engineer has reviewed the proposal.

342. **London Underground** - No comments.

343. **Environment Agency** - No objections to the application, provided conditions regarding contamination. The 'exception test' must be undertaken with regard to Flood Risk. There may be other sources of flooding, including from surface water which the Local Authority can advise on.

344. **Metropolitan Police** - Compartmentalisation will be required as more than 25 units would be served off each core. The development should be able to achieve Secure by Design certification.

345. **Natural England** - no objection. The proposal is unlikely to affect any statutorily protected sites or landscapes. The proposal has not been assessed for impacts upon protected species.

346. **Historic England** - This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

347. **Friends of Burgess Park** - Object to the proposal on the following grounds:

- Heritage and visual impact upon Burgess Park and the character of the local area;
- Cumulative impact of flats along park boundaries not considered;
- Support a 4.8m buffer with the park but a hedge and tall trees would be required along the boundary to support biodiversity;
- Impact of lighting on bats must be dealt with by condition;
- Block A poorly designed;
- Support new housing and / or industry that is low level and supports the location next to the park;
- Lack of playspace;
- Increased pressure on the park;
- Lack of green space within the development.

Additional response following re-consultation:

348. Continue to object for the same reasons, together with concerns regarding overshadowing of the park, existing Victorian factories and warehouses would not be retained, an additional building would be visible from the park, concerns raised by TfL which should be addressed, single-aspect flats, potential overheating. Note the retention of the existing warehouse (block B) as positive and welcome increased family housing.

Camberwell Fields Residents' Association

349. Object to the application on the grounds that many of the proposed buildings would be too high. Anything in excess of 5-stoerys would be out of keeping with the surrounding area and could cause overshadowing and loss of light

Wells Way Triangle Residents' Association

350. Object to the application on the following grounds:

- Would fundamentally change character and townscape of the area, close to Burgess Park which is a Site of Importance for Nature Conservation;
- Likely to be higher levels of noise than predicted in the ES;
- Inadequate air quality monitoring;
- Overshadowing and loss of light;
- Density threshold exceeded;
- Mix of dwellings policy not complied with;
- Lack of outdoor amenity space to block A;
- Block A too close to existing Parkhouse Street terrace;
- Block A is backland development and proposal does not comply with Residential Design Standards SPD as it would not be single-storey;
- Lack of parking;
- Loss of industrial / commercial space;
- Proposed residential accommodation affected by the Babcock Depot and scaffold yard;
- Some residential units undersized and poor layouts.

Additional response following re-consultation

351. Object to revised plans due to:

- The height, mass and bulk of the buildings. Although tower reduced, other buildings increased in height to compensate;
- Site not suitable for tall buildings;
- Council pre-application advice advised that 7-storeys would be the most which would be supported;
- Lack of respect for the character of the area which is low rise;
- Disagree with ES conclusions regarding views and townscape impacts;
- Overshadowing of existing residential properties and Burgess Park;
- Amendments to proposal increase the number of properties which would experience a major effect on NSL;
- Excessive density which has increased in the amended proposal from 1, 396 to 1,604.
- Impact on local services and amenities, in particular our local bus services
- Cumulative impact of this and other developments. Council has not engaged with the community on proposals at 21-23 Parkhouse Street and 35-39 Parkhouse Street.

352. **Officer response** – a planning application at 21-23 has been withdrawn but was subject to public consultation. 35-39 is a pre-application enquiry which is treated as confidential until / unless an application for the site has been submitted.

353. Not opposed in principle to redevelopment of the site, and but any development should be much smaller in scale so that it respects the existing character of the area

354. **Camberwell Association** - object to the application.

- Site had the potential to create a vibrant hub but maximising floorspace put before other considerations;
- Over-scale buildings with random spaces between them;
- No clear community function;
- Existing houses dwarfed by the proposal;
- Overdevelopment and lack of attention to civic realm.

355. **Southwark Green Party**

- Revised plans unacceptable;
- Lack of genuinely affordable housing;
- Density of proposal largely unchanged;
- Would dwarf existing houses;
- Harm to neighbouring heritage assets;
- Impact on public transport;
- Impact on facilities such as GPs and schools;
- Increased flood risk;
- Removal of a cycle lane;
- Lack of childrens' playspace;
- Proximity to and impact upon Burgess Park;
- Impact on a protected tree;

-Not opposed to the principle of redevelopment the site but plans must be scaled back.

Initial consultation

356. Representations have been received from 70 properties objecting to the application on the following grounds.

357. **Land use**

- Loss of commercial floorspace contrary to planning policy;
- Question the demand for the retail spaces which could remain empty;
- Question where previous small businesses have relocated to;
- Question whether the proposed flats would sell;
- Question whether artist units would be occupied and securing them as affordable is an inappropriate use of s106;
- Support the principle of regenerating the area but object to the scale of the proposed development;
- The proposal should include a new community hall;
- Loss of artist studios;
- Transient population if the properties are rented out;
- Cafes and restaurants would be out of character with the area;
- After a 5 year period of affordable rent local businesses would be priced out;
- Should include affordable space for artists.

358. **Affordable housing**

- Insufficient affordable housing;
- Viability assessment shows 35% is not viable so unlikely affordable housing would be delivered;
- Will reduce the availability of council and affordable homes in the area as the homes would be out of the price range of the local community;

359. **Design**

- Harmful to local character, townscape, brick chimney and Burgess Park;
- No policy justification for tall building in this location as not high PTAL area, close to public transport or in the central activities zone;
- Draft NSP not yet adopted;
- Impact upon Parkhouse Street Victorian terrace has not been considered in the townscape analysis and analysis understates impacts;
- Impact upon neighbouring listed buildings and conservation area;
- Sets the wrong precedent for future development;
- Block C should be reduced in height and set back from the street;
- The proposal is not plan-led;
- Lack of green space within the development;
- Block A would be backland development and should be low in scale;
- Wireline drawings showing building heights are misleading.

360. **Density** - The proposal would exceed the density threshold given in the Council's policies. The site is not in an opportunity area or action area core therefore there is no justification for exceeding the policy density range;

361. **Mix of dwellings** - Proposed unit mix contrary to policy.

362. Quality of accommodation

- Insufficient amenity space including playspace;
- Overdevelopment with insufficient natural light or privacy for the proposed occupiers;
- Some units undersized;
- Block A properties have bedrooms and bathrooms accessed off living spaces;
- The noise monitoring locations did not include a location next to the Babcock depot on Parkhouse Street which operates 24/7 and does not adequately pick up traffic noise;
- Noise levels to balconies next to the scaffold yard would be excessive;

363. Amenity

- Loss of daylight, sunlight and overshadowing;
- Loss of privacy;
- Sense of enclosure / loss of outlook;
- Increased noise and disturbance from the development;
- Light and pollution;
- No air quality measurements were taken from Parkhouse Street;
- Increased air pollution;
- Impact of construction work;
- Loss of property value, impact on views and damage to property – officer response – these are not a material planning considerations;
- Block A would be backland development and would not comply with the SPD guidance;
- Impact on services such as community facilities, education and health care;
- Creation of wind tunnels;
- Tall buildings can lead to poor mental health;

364. Transport

- Would attract visitors but no visitor parking is proposed;
- Lack of parking would lead to conflict;
- Question why only accessible parking is proposed;
- Should be car-free except for accessible parking;
- Occupants should be prevented from obtaining parking permits in the surrounding CPZ;
- Impact on busses;
- Traffic generation which cannot be accommodated on local roads;
- TA based on out of date information from 2011 census;
- Provision of parking contrary to climate change / pollution objectives;
- Unclear whether fire engines could access block A;
- Different PTALs given in the submission;
- Proposal would remove a cycle lane on Wells Way;
- No guarantee that the development would be car-free as other developments have failed to comply with this requirement;
- Walking distances to local stations are longer than stated;
- Existing parking restrictions along Wells Way are disregarded during local church services;
- Lack of cycle parking;
- Impact upon highway safety;
- Disturbance / disruption if secondary access to block A from Southampton Way is used by people accessing the main part of the site.

365. Flood risk - Concerned about long term viability of the development in a flood risk zone. Surface water management strategy is inadequate as Wells Way is prone to

flooding and inadequate sewerage capacity.

366. **Sustainability** - Plans do not contain provision for solar energy or photovoltaic panels, contrary to the New Southwark Plan.
367. **Ecology** - Would adjoin the New Church Road wildlife site and would adversely affect biodiversity. The proposal would threaten a protected tree at 43 Parkhouse Street (TPO 86B). The proposal would overshadow the park, impacting upon wildlife.
368. Other matters - Lack of consultation with residents.
369. 3 representations have been received in support of the application for the following reasons:
- Site used for artist studios on a short term basis as a meanwhile use, but on the basis that would find future solutions within the development for purpose built artist studios;
 - The proposal includes 3,375sqm (GIA) of B1 commercial floorspace;
 - The proposed development looks excellent;
 - Site has been dilapidated with large empty areas for many years;
 - Provision of new homes;
 - Improved quality business space;
 - New homes and businesses would bring economic and social benefits;
 - Support the proposal, except for the block A houses.

Comments

370. 2 general comments have been received as follows:
- Adequate refuse storage must be provided;
 - Support proposal but density, height and massing must be reduced and concerns the commercial units would remain empty or attract low quality retail uses;
 - Concerns regarding impact upon former Listed church;
 - Support the provision of new housing;
 - Should reduce car parking on the site to allow for more public realm and space next to Burgess Park;
 - Would be opposed to the development unless public transport is improved.

Re-consultation

371. Objections have been received from 84 properties raising the following additional issues:
- Revised plans do not address previous concerns;
 - Revised plans worse than original plans as some buildings have been reduced but some have got higher;
 - Contrary to NSP 23 which may need revising if replacement floorspace requires an excessive number of residential units to be viable;
 - Buildings too close together;
 - Lack of walking space within the development;
 - Featureless design;
 - Proximity to Burgess Park;
 - Roof level wind turbines should be incorporated;

- Proposal would not help with youth crime, loneliness, obesity, depression or homelessness;
- Need more spaces for children and youth, green spaces, allotments, community cafes and art spaces;
- Should be an east/west cycle route through the development;
- Block A houses would be closer to Burgess Park;
- One word submissions objecting to or supporting the application should be give less weight than detailed responses;
- Daylight / sunlight impacts would be worsened in some instances;
- Lack of daylight and outdoor space to commercial spaces and floor to ceiling heights reduced;
- Parkhouse Street should be made a cul-de-sac;
- Question the tax practices and potential other practices of the developer (officer response – this is not a material planning consideration)
- Site could be used for Air BnB purposes (officer response – in London Air BnB can only operate for 90 days in one calendar year);
- Too many planning documents for residents to review;
- Are already breweries in the area;
- Should not be building towers following the Grenfell tragedy.

372. Supports have been received from 47 properties on the following grounds:

- Good form of development;
- Support much needed additional housing;
- Would replace a low density business park which is an eyesore in a residential area;
- Unfortunate that the tower was reduced in height which reduced the number of homes which could be provided;
- High quality refuse storage is required.

373. General comment have been received from 2 properties:

- Insufficient space to provide the 5 houses behind the existing Parkhouse Street terrace without impacting upon light and privacy;
- Should be 21m to the back of the existing properties;
- Still too high;
- Impact of significant number of new residents not fully thought through.

Human rights implications

374. 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.

375. This application has the legitimate aim of providing a comprehensive redevelopment of the site. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2236-2 Application file: 17/AP/4797 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: Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Daylight and Sunlight Tables
Appendix 4	Pre-Application Letter
Appendix 5	Recommendation

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Victoria Lewis, Team Leader	
Version	Final	
Dated	12 November 2018	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		16 November 2018

APPENDIX 1

Consultation undertaken

Site notice date: 01/02/2018, 13/02/2018, 23/08/2018, 28/09/2018.

Press notice date: 01/02/2018, 23/08/2018, 27/09/2018.

Case officer site visit date: Various.

Neighbour consultation letters sent: 02/02/2018, 13/02/2018, 23/08/2018, 28/09/2018.

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

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

Neighbour and local groups consulted:

91 Southampton Way London SE5 7SX
89 Southampton Way London SE5 7SX
93 Southampton Way London SE5 7SX
The Flying Dutchman 156 Wells Way SE5 7SY
99 Southampton Way London SE5 7SX
95 Southampton Way London SE5 7SX
105 Southampton Way London SE5 7SX
101 Southampton Way London SE5 7SX
107 Southampton Way London SE5 7SX
85 Southampton Way London SE5 7SX

6 Southampton Way London SE5 7SS
56 Southampton Way London SE5 7TT
54 Southampton Way London SE5 7TT
75 Edmund Street London SE5 7NF
Flat 9 8 Benhill Road SE5 7PU
Flat 8 8 Benhill Road SE5 7PU
77 Edmund Street London SE5 7NF
83 Edmund Street London SE5 7NF
81 Edmund Street London SE5 7NF
79 Edmund Street London SE5 7NF

113 Southampton Way London SE5 7SX
101 Wells Way London SE5 7SZ
125 Wells Way London SE5 7SZ
123 Wells Way London SE5 7SZ
121 Wells Way London SE5 7SZ
127 Wells Way London SE5 7SZ
131 Wells Way London SE5 7SZ
129 Wells Way London SE5 7SZ
107 Wells Way London SE5 7SZ
105 Wells Way London SE5 7SZ
103 Wells Way London SE5 7SZ
111 Wells Way London SE5 7SZ
119 Wells Way London SE5 7SZ
117 Wells Way London SE5 7SZ
Flat 1 113 Wells Way SE5 7SZ
149 Southampton Way London SE5 7EW
147 Southampton Way London SE5 7EW
145 Southampton Way London SE5 7EW
17 Southampton Way London SE5 7SW
13 Southampton Way London SE5 7SW
127 Southampton Way London SE5 7EW
117 Southampton Way London SE5 7SW
153 Southampton Way London SE5 7EJ
129 Southampton Way London SE5 7EW
143 Southampton Way London SE5 7EW
141 Southampton Way London SE5 7EW
139 Southampton Way London SE5 7EW
21 Southampton Way London SE5 7SW
41 Southampton Way London SE5 7SW
37 Southampton Way London SE5 7SW
47 Southampton Way London SE5 7SW
27 Southampton Way London SE5 7SW
29 Southampton Way London SE5 7SW
35 Southampton Way London SE5 7SW
31 Southampton Way London SE5 7SW
135 Wells Way London SE5 7SZ
45 Rainbow Street London SE5 7TB
43 Rainbow Street London SE5 7TB
41 Rainbow Street London SE5 7TB
47 Rainbow Street London SE5 7TB
51 Rainbow Street London SE5 7TB
5 Rainbow Street London SE5 7TB
49 Rainbow Street London SE5 7TB
27 Rainbow Street London SE5 7TB
25 Rainbow Street London SE5 7TB
23 Rainbow Street London SE5 7TB
29 Rainbow Street London SE5 7TB
37 Rainbow Street London SE5 7TB
33 Rainbow Street London SE5 7TB
3 Rainbow Street London SE5 7TB
53 Rainbow Street London SE5 7TB
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20 Rainbow Street London SE5 7TD
2 Rainbow Street London SE5 7TD
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30 Rainbow Street London SE5 7TD
28 Rainbow Street London SE5 7TD
26 Rainbow Street London SE5 7TD
10 Rainbow Street London SE5 7TD
9 Rainbow Street London SE5 7TB
7 Rainbow Street London SE5 7TB
12 Rainbow Street London SE5 7TD
18 Rainbow Street London SE5 7TD
16 Rainbow Street London SE5 7TD
14 Rainbow Street London SE5 7TD
10 Dowlas Street London SE5 7TA
1 Dowlas Street London SE5 7TA
99 Wells Way London SE5 7SZ
12 Dowlas Street London SE5 7TA
15 Dowlas Street London SE5 7TA
14 Dowlas Street London SE5 7TA
13 Dowlas Street London SE5 7TA
141 Wells Way London SE5 7SZ

62 Southampton Way London SE5 7TT
Flat 65 64 St Georges Way SE15 6QW
Flat 64 64 St Georges Way SE15 6QW
Flat 63 64 St Georges Way SE15 6QW
Flat 66 64 St Georges Way SE15 6QW
82 Tower Mill Road London SE15 6BP
Flat 70 64 St Georges Way SE15 6QW
Flat 68 64 St Georges Way SE15 6QW
92 Southampton Way London SE5 7TT
74 Southampton Way London SE5 7TT
64 Southampton Way London SE5 7TT
Flat 58 64 St Georges Way SE15 6QW
Flat 61 64 St Georges Way SE15 6QW
Flat 60 64 St Georges Way SE15 6QW
Flat 59 64 St Georges Way SE15 6QW
26 Benhill Road London SE5 7PT
10 Chiswell Street London SE5 7PX
12 Chiswell Street London SE5 7PX
Flat 2 56 Coleman Road SE5 7TG
13 Durfey Place London SE5 7QD
3 Donato Drive London SE15 6BF
8 Durfey Place London SE5 7QD
12 Durfey Place London SE5 7QD
Flat 9 87 Edmund Street SE5 7NH
Flat 8 87 Edmund Street SE5 7NH
Flat 7 87 Edmund Street SE5 7NH
Flat 4 63 Wells Way SE5 7GB
Flat 1 56 Coleman Road SE5 7TG
Flat 13 59 Wells Way SE5 7UB
Flat 8 63 Wells Way SE5 7GB
7 Donato Drive London SE15 6BF
19 Chiswell Street London SE5 7PZ
17 Chiswell Street London SE5 7PZ
56a Coleman Road London SE5 7TG
14 Chiswell Street London SE5 7PX
1 Donato Drive London SE15 6BF
5 Donato Drive London SE15 6BF
16 Chiswell Street London SE5 7PX
11 Durfey Place London SE5 7QD
10 Durfey Place London SE5 7QD
9 Durfey Place London SE5 7QD
Flat 33 60 St Georges Way SE15 6QR
Flat 32 60 St Georges Way SE15 6QR
Flat 31 60 St Georges Way SE15 6QR
Flat 34 60 St Georges Way SE15 6QR
Flat 42 62 St Georges Way SE15 6QS
Flat 37 62 St Georges Way SE15 6QS
Flat 36 62 St Georges Way SE15 6QS
Flat 16 60 St Georges Way SE15 6QR
Flat 6 56 Coleman Road SE5 7TG
Flat 4 56 Coleman Road SE5 7TG
Flat 17 60 St Georges Way SE15 6QR
Flat 27 60 St Georges Way SE15 6QR
Flat 23 60 St Georges Way SE15 6QR
Flat 20 60 St Georges Way SE15 6QR
Flat 3 59 Wells Way SE5 7UB
Flat 2 87 Edmund Street SE5 7NH
Flat 1 87 Edmund Street SE5 7NH
Flat 3 87 Edmund Street SE5 7NH
Flat 6 87 Edmund Street SE5 7NH
Flat 5 87 Edmund Street SE5 7NH
Flat 4 87 Edmund Street SE5 7NH
Flat 9 59 Wells Way SE5 7UB
Flat 6 59 Wells Way SE5 7UB
Flat 5 59 Wells Way SE5 7UB
Flat 3 63 Wells Way SE5 7GB
Flat 9 63 Wells Way SE5 7GB
Flat 7 63 Wells Way SE5 7GB
Flat 6 63 Wells Way SE5 7GB
Flat 7 8 Benhill Road SE5 7PU
90 Southampton Way London SE5 7TT
88 Southampton Way London SE5 7TT
86 Southampton Way London SE5 7TT

139 Wells Way London SE5 7SZ
137 Wells Way London SE5 7SZ
143 Wells Way London SE5 7SZ
97 Wells Way London SE5 7SZ
147 Wells Way London SE5 7SZ
145 Wells Way London SE5 7SZ
16 Dowlas Street London SE5 7TA
11 Rainbow Street London SE5 7TB
1 Rainbow Street London SE5 7TB
8 Dowlas Street London SE5 7TA
13 Rainbow Street London SE5 7TB
21 Rainbow Street London SE5 7TB
15 Rainbow Street London SE5 7TB
3 Dowlas Street London SE5 7TA
2 Dowlas Street London SE5 7TA
17 Dowlas Street London SE5 7TA
4 Dowlas Street London SE5 7TA
7 Dowlas Street London SE5 7TA
6 Dowlas Street London SE5 7TA
5 Dowlas Street London SE5 7TA
41 Parkhouse Street London SE5 7TQ
Flat 18 Leigh Court SE5 7FP
Flat 17 Leigh Court SE5 7FP
Flat 16 Leigh Court SE5 7FP
Flat 19 Leigh Court SE5 7FP
Flat 22 Leigh Court SE5 7FP
Flat 21 Leigh Court SE5 7FP
Flat 20 Leigh Court SE5 7FP
Flat 11 Leigh Court SE5 7FP
Flat 10 Leigh Court SE5 7FP
Flat 9 Leigh Court SE5 7FP
Flat 12 Leigh Court SE5 7FP
Flat 15 Leigh Court SE5 7FP
Flat 14 Leigh Court SE5 7FP
Flat 13 Leigh Court SE5 7FP
Flat 23 Leigh Court SE5 7FP
7 Benhill Road London SE5 7FT
5 Benhill Road London SE5 7FT
9 Benhill Road London SE5 7FT
15 Benhill Road London SE5 7FT
13 Benhill Road London SE5 7FT
11 Benhill Road London SE5 7FT
Ground Floor And Basement 101 Southampton Way SE5 7SX
The Well Community Church Wells Way SE5 7SY
Flat 24 Leigh Court SE5 7FP
1 Benhill Road London SE5 7FT
Flat Above 101 Southampton Way SE5 7SX
Flat 27 Hodgkin Court SE5 7FN
Flat 26 Hodgkin Court SE5 7FN
Flat 25 Hodgkin Court SE5 7FN
Flat 28 Hodgkin Court SE5 7FN
Flat 31 Hodgkin Court SE5 7FN
Flat 30 Hodgkin Court SE5 7FN
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Flat 22 Hodgkin Court SE5 7FN
Flat 32 Hodgkin Court SE5 7FN
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Flat 3 Leigh Court SE5 7FP
Flat 2 Leigh Court SE5 7FP
Flat 5 Leigh Court SE5 7FP
Flat 8 Leigh Court SE5 7FP
Flat 7 Leigh Court SE5 7FP
Flat 6 Leigh Court SE5 7FP
3 Sam King Walk London SE5 7FP
2 Sam King Walk London SE5 7FP
4 Sam King Walk London SE5 7FP
94 Southampton Way London SE5 7TT
Flat 2 59 Wells Way SE5 7UB
96 Southampton Way London SE5 7TT
52 Southampton Way London SE5 7TT
50 Southampton Way London SE5 7TT
48 Southampton Way London SE5 7TT
78 Southampton Way London SE5 7TT
84 Southampton Way London SE5 7TT
82 Southampton Way London SE5 7TT
80 Southampton Way London SE5 7TT
Flat 4 59 Wells Way SE5 7UB
90 Tower Mill Road London SE15 6BP
Flat 14 59 Wells Way SE5 7UB
Room 4 75-77 Southampton Way SE5 7SW
Room 3 75-77 Southampton Way SE5 7SW
Room 2 75-77 Southampton Way SE5 7SW
Room 5 75-77 Southampton Way SE5 7SW
Room 8 75-77 Southampton Way SE5 7SW
Room 7 75-77 Southampton Way SE5 7SW
Room 6 75-77 Southampton Way SE5 7SW
Unit 5 Ground Floor Burgess Industrial Estate SE5 7TQ
Flat 2 Collingwood House SE5 7ST
Flat 1 Collingwood House SE5 7ST
Unit 6 First Floor Burgess Industrial Estate SE5 7TJ
Room 12 75-77 Southampton Way SE5 7SW
Room 10 75-77 Southampton Way SE5 7SW
Room 1 75-77 Southampton Way SE5 7SW
Room 9 75-77 Southampton Way SE5 7SW
80 Tower Mill Road London SE15 6BP
78 Tower Mill Road London SE15 6BP
76 Tower Mill Road London SE15 6BP
84 Tower Mill Road London SE15 6BP
46 Southampton Way London SE5 7TT
44 Southampton Way London SE5 7TT
86 Tower Mill Road London SE15 6BP
10 Comfort Street London SE15 6BT
8 Comfort Street London SE15 6BT
129a Southampton Way London SE5 7EW
12 Comfort Street London SE15 6BT
74 Tower Mill Road London SE15 6BP
16 Comfort Street London SE15 6BT
14 Comfort Street London SE15 6BT
Flat 69 64 St Georges Way SE15 6QW
Flat 67 64 St Georges Way SE15 6QW
Flat 62 64 St Georges Way SE15 6QW
Flat 1 59 Wells Way SE5 7UB
Flat 12 59 Wells Way SE5 7UB
Flat 11 59 Wells Way SE5 7UB
Flat 10 59 Wells Way SE5 7UB
Flat 53 62 St Georges Way SE15 6QS
Flat 52 62 St Georges Way SE15 6QS
Flat 51 62 St Georges Way SE15 6QS
Flat 54 62 St Georges Way SE15 6QS
Flat 57 64 St Georges Way SE15 6QW
Flat 56 64 St Georges Way SE15 6QW
Flat 55 62 St Georges Way SE15 6QS
Flat 15 59 Wells Way SE5 7UB
6 Benhill Road London SE5 7PT
12 Benhill Road London SE5 7PT
Flat 4 73 Wells Way SE5 7GD
Flat 2 8 Benhill Road SE5 7PU
Flat 5 8 Benhill Road SE5 7PU
Flat 4 8 Benhill Road SE5 7PU
Flat 3 8 Benhill Road SE5 7PU
Flat 1 63 Wells Way SE5 7GB
Flat 8 59 Wells Way SE5 7UB
Flat 7 59 Wells Way SE5 7UB
Flat 2 63 Wells Way SE5 7GB
Flat 2 73 Wells Way SE5 7GD
69 Wells Way London SE5 7GA
Flat 5 63 Wells Way SE5 7GB
Flat 22 60 St Georges Way SE15 6QR

Flat 1 Leigh Court SE5 7FP
6 Sam King Walk London SE5 7FP
5 Sam King Walk London SE5 7FP
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Flat 5 Dunvill Court SE5 7FT
Flat 4 Dunvill Court SE5 7FT
Flat 7 Dunvill Court SE5 7FT
Flat 10 Dunvill Court SE5 7FT
Flat 9 Dunvill Court SE5 7FT
Flat 8 Dunvill Court SE5 7FT
Flat 8 Sullivan House SE5 7FT
Flat 7 Sullivan House SE5 7FT
Flat 6 Sullivan House SE5 7FT
Flat 9 Sullivan House SE5 7FT
Flat 3 Dunvill Court SE5 7FT
Flat 2 Dunvill Court SE5 7FT
Flat 1 Dunvill Court SE5 7FT
Flat 11 Dunvill Court SE5 7FT
Flat 4 83 Tower Mill Road SE15 6BS
Flat 3 83 Tower Mill Road SE15 6BS
Flat 2 83 Tower Mill Road SE15 6BS
Flat 5 83 Tower Mill Road SE15 6BS
85 Tower Mill Road London SE15 6BS
81 Tower Mill Road London SE15 6BS
Flat 6 83 Tower Mill Road SE15 6BS
100 Southampton Way London SE5 7EW
2 Harris Street London SE5 7RZ
Flat 12 Dunvill Court SE5 7FT
102 Southampton Way London SE5 7EW
Flat 1 83 Tower Mill Road SE15 6BS
6 Cottage Green London SE5 7ST
1b Rainbow Street London SE5 7TB
37 Benhill Road London SE5 7FT
35 Benhill Road London SE5 7FT
33 Benhill Road London SE5 7FT
39 Benhill Road London SE5 7FT
Flat 1 Evison House SE5 7FT
43 Benhill Road London SE5 7FT
41 Benhill Road London SE5 7FT
23 Benhill Road London SE5 7FT
21 Benhill Road London SE5 7FT
19 Benhill Road London SE5 7FT
31 Benhill Road London SE5 7FT
29 Benhill Road London SE5 7FT
27 Benhill Road London SE5 7FT
Flat 2 Evison House SE5 7FT
Flat 1 Sullivan House SE5 7FT
Flat 11 Evison House SE5 7FT
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Flat 2 Sullivan House SE5 7FT
Flat 5 Sullivan House SE5 7FT
Flat 4 Sullivan House SE5 7FT
Flat 3 Sullivan House SE5 7FT
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Flat 9 Evison House SE5 7FT
Flat 8 Evison House SE5 7FT
Flat 7 Evison House SE5 7FT
32 Rainbow Street London SE5 7TD
42 Rainbow Street London SE5 7TD
97 Southampton Way London SE5 7SX
137 Southampton Way London SE5 7EW
131 Southampton Way London SE5 7EW
49-51 Southampton Way London SE5 7SW
109 Wells Way London SE5 7SZ
2 Parkhouse Street London SE5 7TQ
First Floor Flat 3 Claremont Villas SE5 7SS
First Floor Flat 2 Claremont Villas SE5 7SS
Lesoco Camberwell Centre Southampton Way SE5 7EW
First Floor Flat 4 Claremont Villas SE5 7SS
Unit 9 Burgess Industrial Park SE5 7TJ
Flat 21 60 St Georges Way SE15 6QR
Flat 19 60 St Georges Way SE15 6QR
Flat 24 60 St Georges Way SE15 6QR
Flat 28 60 St Georges Way SE15 6QR
Flat 26 60 St Georges Way SE15 6QR
Flat 25 60 St Georges Way SE15 6QR
Flat 1 8 Benhill Road SE5 7PU
14 Benhill Road London SE5 7PT
10 Benhill Road London SE5 7PT
Flat 6 8 Benhill Road SE5 7PU
Flat 18 60 St Georges Way SE15 6QR
98 Southampton Way London SE5 7TT
76 Southampton Way London SE5 7TT
Flat 29 60 St Georges Way SE15 6QR
Flat 46 62 St Georges Way SE15 6QS
Flat 45 62 St Georges Way SE15 6QS
Flat 44 62 St Georges Way SE15 6QS
Flat 47 62 St Georges Way SE15 6QS
Flat 50 62 St Georges Way SE15 6QS
Flat 49 62 St Georges Way SE15 6QS
Flat 48 62 St Georges Way SE15 6QS
Flat 38 62 St Georges Way SE15 6QS
Flat 35 60 St Georges Way SE15 6QR
Flat 30 60 St Georges Way SE15 6QR
Flat 39 62 St Georges Way SE15 6QS
Flat 43 62 St Georges Way SE15 6QS
Flat 41 62 St Georges Way SE15 6QS
Flat 40 62 St Georges Way SE15 6QS
1-3 Southampton Way London SE5 7SW
Flat 6 Hogan Court SE5 7NF
Flat 5 Hogan Court SE5 7NF
Flat 4 Hogan Court SE5 7NF
Flat 7 Hogan Court SE5 7NF
Flat 10 Hogan Court SE5 7NF
Flat 9 Hogan Court SE5 7NF
Flat 8 Hogan Court SE5 7NF
71 Edmund Street London SE5 7NF
69 Edmund Street London SE5 7NF
67 Edmund Street London SE5 7NF
73 Edmund Street London SE5 7NF
Flat 3 Hogan Court SE5 7NF
Flat 2 Hogan Court SE5 7NF
Flat 1 Hogan Court SE5 7NF
Flat 11 Hogan Court SE5 7NF
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Flat 20 Hogan Court SE5 7NF
Flat 19 Hogan Court SE5 7NF
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Flat 24 Hogan Court SE5 7NF
Flat 23 Hogan Court SE5 7NF
Flat 14 Hogan Court SE5 7NF
Flat 13 Hogan Court SE5 7NF
Flat 12 Hogan Court SE5 7NF
Flat 15 Hogan Court SE5 7NF
Flat 18 Hogan Court SE5 7NF
Flat 17 Hogan Court SE5 7NF
Flat 16 Hogan Court SE5 7NF
Flat 10 Ayres Court SE5 7FA
Flat 9 Ayres Court SE5 7FA
Flat 8 Ayres Court SE5 7FA
Flat 11 Ayres Court SE5 7FA
Flat 14 Ayres Court SE5 7FA
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Flat 2 Ayres Court SE5 7FA
Flat 1 Ayres Court SE5 7FA
Flat 4 Ayres Court SE5 7FA
Flat 7 Ayres Court SE5 7FA
Flat 6 Ayres Court SE5 7FA
Flat 5 Ayres Court SE5 7FA
Flat 15 Ayres Court SE5 7FA

21-23 Parkhouse Street London SE5 7TQ
9 Dowlas Street London SE5 7TA
10 Parkhouse Street London SE5 7TQ
1 Coleman Road London SE5 7TH
Flat 5 113 Wells Way SE5 7SZ
Flat 4 113 Wells Way SE5 7SZ
3 Coleman Road London SE5 7TH
81 Wells Way London SE5 7TR
79 Wells Way London SE5 7TR
77 Wells Way London SE5 7TR
66 Wells Way London SE5 7UA
43 Parkhouse Street London SE5 7TQ
119 Southampton Way London SE5 7EW
Flat 3 113 Wells Way SE5 7SZ
Flat 2 113 Wells Way SE5 7SZ
25-33 Parkhouse Street London SE5 7TQ
12 Parkhouse Street London SE5 7TQ
Ground Floor 39 Rainbow Street SE5 7TB
35a-35b Southampton Way London SE5 7SW
Ground Floor Flat 5 Claremont Villas SE5 7SS
Ground Floor Flat 4 Claremont Villas SE5 7SS
Ground Floor Flat 1 Claremont Villas SE5 7SS
First Floor Flat 1 Claremont Villas SE5 7SS
109-111 Southampton Way London SE5 7SX
75-77 Southampton Way London SE5 7SW
53-65 Southampton Way London SE5 7SW
Unit 7 Burgess Industrial Park SE5 7TJ
17 Rainbow Street London SE5 7TB
First Floor 39 Rainbow Street SE5 7TB
5-7 Cottage Green London SE5 7ST
First Floor Flat 5 Claremont Villas SE5 7SS
146-154 Wells Way London SE5 7SY
69 Southampton Way London SE5 7SW
Flat 8 133-135 Southampton Way SE5 7EW
54a Coleman Road London SE5 7TG
Unit 1 Burgess Industrial Park SE5 7TJ
St Georges C Of E Primary School Coleman Road SE5
7TF
Flat 3 133-135 Southampton Way SE5 7EW
Flat 2 133-135 Southampton Way SE5 7EW
Flat 1 133-135 Southampton Way SE5 7EW
Flat 4 133-135 Southampton Way SE5 7EW
Flat 7 133-135 Southampton Way SE5 7EW
Flat 6 133-135 Southampton Way SE5 7EW
Flat 5 133-135 Southampton Way SE5 7EW
83 Wells Way London SE5 7TR
Rear Of 35-39 Parkhouse Street SE5 7TQ
Unit 4 First Floor Burgess Industrial Estate SE5 7TQ
9-11 Southampton Way London SE5 7SW
133-135 Southampton Way London SE5 7EW
5-7 Southampton Way London SE5 7SW
1 Cottage Green London SE5 7ST
Rear Of 58 Coleman Road SE5 7TG
Flat 3 Collingwood House SE5 7ST
Part Ground Floor 9-11 Cottage Green SE5 7ST
Unit 2 Burgess Industrial Estate SE5 7TQ
Unit 9 2-10 Parkhouse Street SE5 7TJ
Unit 6 Ground Floor Burgess Industrial Estate SE5 7TJ
151 Southampton Way London SE5 7EJ
33 Harris Street London SE5 7RX
39c Southampton Way London SE5 7SW
First Floor Flat 125 Southampton Way SE5 7EW
First Floor Flat 117 Southampton Way SE5 7EW
First Floor Flat 79 Southampton Way SE5 7SW
89 Wells Way London SE5 7TR
87 Wells Way London SE5 7TR
85 Wells Way London SE5 7TR
91 Wells Way London SE5 7TR
15-19 Parkhouse Street London SE5 7TQ
95 Wells Way London SE5 7TR
93 Wells Way London SE5 7TR
Flat 1 119 Southampton Way SE5 7EW
Ground Floor Front Flat 3c 79 Southampton Way SE5 7SW
Flat 24 Ayres Court SE5 7FA
Flat 23 Ayres Court SE5 7FA
65 Edmund Street London SE5 7NF
63 Edmund Street London SE5 7NF
Flat 18 Ayres Court SE5 7FA
Flat 17 Ayres Court SE5 7FA
Flat 16 Ayres Court SE5 7FA
Flat 19 Ayres Court SE5 7FA
Flat 22 Ayres Court SE5 7FA
Flat 21 Ayres Court SE5 7FA
Flat 20 Ayres Court SE5 7FA
Flat 26 Hogan Court SE5 7NF
Flat 11 Barrett Court SE5 7FL
Flat 10 Barrett Court SE5 7FL
Flat 9 Barrett Court SE5 7FL
Flat 12 Barrett Court SE5 7FL
Flat 1 Hodgkin Court SE5 7FN
Flat 14 Barrett Court SE5 7FL
Flat 13 Barrett Court SE5 7FL
Flat 4 Barrett Court SE5 7FL
Flat 3 Barrett Court SE5 7FL
Flat 2 Barrett Court SE5 7FL
Flat 5 Barrett Court SE5 7FL
Flat 8 Barrett Court SE5 7FL
Flat 7 Barrett Court SE5 7FL
Flat 6 Barrett Court SE5 7FL
Flat 2 Hodgkin Court SE5 7FN
Flat 12 Hodgkin Court SE5 7FN
Flat 11 Hodgkin Court SE5 7FN
Flat 10 Hodgkin Court SE5 7FN
Flat 13 Hodgkin Court SE5 7FN
Flat 16 Hodgkin Court SE5 7FN
Flat 15 Hodgkin Court SE5 7FN
Flat 14 Hodgkin Court SE5 7FN
Flat 5 Hodgkin Court SE5 7FN
Flat 4 Hodgkin Court SE5 7FN
Flat 3 Hodgkin Court SE5 7FN
Flat 6 Hodgkin Court SE5 7FN
Flat 9 Hodgkin Court SE5 7FN
Flat 8 Hodgkin Court SE5 7FN
Flat 7 Hodgkin Court SE5 7FN
Flat 5 Mori Court SE5 7FJ
Flat 4 Mori Court SE5 7FJ
Flat 3 Mori Court SE5 7FJ
Flat 6 Mori Court SE5 7FJ
Flat 9 Mori Court SE5 7FJ
Flat 8 Mori Court SE5 7FJ
Flat 7 Mori Court SE5 7FJ
Flat 29 Hogan Court SE5 7NF
Flat 28 Hogan Court SE5 7NF
Flat 27 Hogan Court SE5 7NF
Flat 30 Hogan Court SE5 7NF
Flat 2 Mori Court SE5 7FJ
Flat 1 Mori Court SE5 7FJ
Flat 31 Hogan Court SE5 7NF
Flat 10 Mori Court SE5 7FJ
Flat 4 Kitaj Court SE5 7NF
Flat 3 Kitaj Court SE5 7NF
Flat 2 Kitaj Court SE5 7NF
Flat 5 Kitaj Court SE5 7NF
Flat 1 Barrett Court SE5 7FL
Flat 13 Mori Court SE5 7FJ
Flat 12 Mori Court SE5 7FJ
Flat 11 Mori Court SE5 7FJ
Flat 14 Mori Court SE5 7FJ
Flat 1 Kitaj Court SE5 7NF
Flat 16 Mori Court SE5 7FJ
Flat 15 Mori Court SE5 7FJ
Flat 2 14 Coleman Road SE5 7TG
Flat 7 14 Coleman Road SE5 7TG
Flat 5 14 Coleman Road SE5 7TG
First Floor Flat 103 Southampton Way SE5 7SX

Ground Floor Flat 87 Southampton Way SE5 7SW
Ground Floor Flat 39 Parkhouse Street SE5 7TQ
Ground Floor Rear Flat 4d 79 Southampton Way SE5 7SW
Second Floor Flat 125 Southampton Way SE5 7EW
Second And Third Floor Flat 79 Southampton Way SE5 7SW
Ground Floor And First Floor Flat 1 Cottage Green SE5 7ST
Flat 2 45 Southampton Way SE5 7SW
Flat 2 119 Southampton Way SE5 7EW
Flat 1 45 Southampton Way SE5 7SW
Flat 3 45 Southampton Way SE5 7SW
Ground Floor Flat 19 Rainbow Street SE5 7TB
Flat B 25 Southampton Way SE5 7SW
Flat A 25 Southampton Way SE5 7SW
58 Coleman Road London SE5 7TG
54 Coleman Road London SE5 7TG
6 Coleman Road London SE5 7TG
11 Parkhouse Street London SE5 7TQ
1 Parkhouse Street London SE5 7TQ
8 Coleman Road London SE5 7TG
44 Coleman Road London SE5 7TG
42 Coleman Road London SE5 7TG
40 Coleman Road London SE5 7TG
46 Coleman Road London SE5 7TG
52 Coleman Road London SE5 7TG
50 Coleman Road London SE5 7TG
48 Coleman Road London SE5 7TG
13 Parkhouse Street London SE5 7TQ
6 Claremont Villas Southampton Way SE5 7SS
Ground Floor Flat 3 Claremont Villas SE5 7SS
Ground Floor Flat 2 Claremont Villas SE5 7SS
15a Southampton Way London SE5 7SW
17a Southampton Way London SE5 7SW
15c Southampton Way London SE5 7SW
15b Southampton Way London SE5 7SW
37 Parkhouse Street London SE5 7TQ
3 Parkhouse Street London SE5 7TQ
39 Parkhouse Street London SE5 7TQ
9 Parkhouse Street London SE5 7TQ
7 Parkhouse Street London SE5 7TQ
5 Parkhouse Street London SE5 7TQ
50 Rainbow Street London SE5 7TD
48 Rainbow Street London SE5 7TD
6 Rainbow Street London SE5 7TD
13 Bonsor Street London SE5 7TE
12 Bonsor Street London SE5 7TE
8 Rainbow Street London SE5 7TD
38 Rainbow Street London SE5 7TD
36 Rainbow Street London SE5 7TD
34 Rainbow Street London SE5 7TD
4 Rainbow Street London SE5 7TD
46 Rainbow Street London SE5 7TD
44 Rainbow Street London SE5 7TD
40 Rainbow Street London SE5 7TD
14 Bonsor Street London SE5 7TE
24 Coleman Road London SE5 7TG
22 Coleman Road London SE5 7TG
20 Coleman Road London SE5 7TG
26 Coleman Road London SE5 7TG
4 Coleman Road London SE5 7TG
30 Coleman Road London SE5 7TG
28 Coleman Road London SE5 7TG
17 Bonsor Street London SE5 7TE
16 Bonsor Street London SE5 7TE
15 Bonsor Street London SE5 7TE
10 Coleman Road London SE5 7TG
2 Coleman Road London SE5 7TG
St Georges Tavern 14 Coleman Road SE5 7TG
12 Coleman Road London SE5 7TG
17b Southampton Way London SE5 7SW
Flat B 32 Coleman Road SE5 7TG
Flat B 18 Coleman Road SE5 7TG
Flat 1 14 Coleman Road SE5 7TG
Flat 6 14 Coleman Road SE5 7TG
Flat 8 60 Southampton Way SE5 7TX
Flat 7 60 Southampton Way SE5 7TX
Flat 6 60 Southampton Way SE5 7TX
Flat 1 60 Southampton Way SE5 7TX
Flat 9 60 Southampton Way SE5 7TX
Flat 3 60 Southampton Way SE5 7TX
Flat 12 60 Southampton Way SE5 7TX
Flat A 133 Wells Way SE5 7SZ
Flat 1 Windmill Court SE5 7FG
Ground Floor Rear Flat 4e 79 Southampton Way SE5 7SW
Flat 3 47 Southampton Way SE5 7SW
Flat 2 Windmill Court SE5 7FG
Flat 5 Windmill Court SE5 7FG
Flat 4 Windmill Court SE5 7FG
Flat 3 Windmill Court SE5 7FG
Flat 4 47 Southampton Way SE5 7SW
Flat 3 56 Coleman Road SE5 7TG
Flat B 133 Wells Way SE5 7SZ
Flat 1 2a Cottage Green SE5 7ST
Flat 2 47 Southampton Way SE5 7SW
Flat 1 47 Southampton Way SE5 7SW
Flat 2 2a Cottage Green SE5 7ST
Flat 4 23 Chiswell Street SE5 7PZ
Flat 3 23 Chiswell Street SE5 7PZ
Flat 2 23 Chiswell Street SE5 7PZ
Flat 5 23 Chiswell Street SE5 7PZ
Flat 8 23 Chiswell Street SE5 7PZ
Flat 7 23 Chiswell Street SE5 7PZ
Flat 6 23 Chiswell Street SE5 7PZ
21 Chiswell Street London SE5 7PZ
Flat 10 14 Coleman Road SE5 7TG
Excluding Part Ground Floor 9-11 Cottage Green SE5 7ST
25 Chiswell Street London SE5 7PZ
Flat 1 23 Chiswell Street SE5 7PZ
28 Benhill Road London SE5 7PT
8 Cottage Green London SE5 7ST
Flat 9 23 Chiswell Street SE5 7PZ
Flat 11 60 Southampton Way SE5 7TX
Flat 10 60 Southampton Way SE5 7TX
Flat 1a 60 Southampton Way SE5 7TX
Flat 5 60 Southampton Way SE5 7TX
Flat 4 60 Southampton Way SE5 7TX
Flat 2 60 Southampton Way SE5 7TX
Flat 11 23 Chiswell Street SE5 7PZ
Flat 10 23 Chiswell Street SE5 7PZ
Flat 5 56 Coleman Road SE5 7TG
18 Chiswell Street London SE5 7PX
7 Durfey Place London SE5 7QD
6 Durfey Place London SE5 7QD
Flat 6 Windmill Court SE5 7FG
Flat 15 Hambling Court SE5 7TT
Flat 14 Hambling Court SE5 7TT
Flat 13 Hambling Court SE5 7TT
Flat 16 Hambling Court SE5 7TT
Flat 19 Hambling Court SE5 7TT
Flat 18 Hambling Court SE5 7TT
Flat 17 Hambling Court SE5 7TT
Flat 8 Hambling Court SE5 7TT
Flat 7 Hambling Court SE5 7TT
Flat 6 Hambling Court SE5 7TT
Flat 9 Hambling Court SE5 7TT
Flat 12 Hambling Court SE5 7TT
Flat 11 Hambling Court SE5 7TT
Flat 10 Hambling Court SE5 7TT
Flat 20 Hambling Court SE5 7TT
Flat 30 Hambling Court SE5 7TT
Flat 29 Hambling Court SE5 7TT
Flat 28 Hambling Court SE5 7TT
Flat 31 Hambling Court SE5 7TT

Flat B 16 Coleman Road SE5 7TG
Flat B 36 Coleman Road SE5 7TG
Flat D 32 Coleman Road SE5 7TG
Flat C 32 Coleman Road SE5 7TG
Flat B 38 Coleman Road SE5 7TG
16a Coleman Road London SE5 7TG
Flat B 56 Rainbow Street SE5 7TD
Flat B 54 Rainbow Street SE5 7TD
Flat A 18 Coleman Road SE5 7TG
Flat A 38 Coleman Road SE5 7TG
Flat A 36 Coleman Road SE5 7TG
Flat A 32 Coleman Road SE5 7TG

1a Parkhouse Street London SE5 7TQ
Flat 3 Newman House SE5 7TS
Flat 2 Newman House SE5 7TS
Flat 1 Newman House SE5 7TS
Flat 4 Newman House SE5 7TS
54b Southampton Way London SE5 7TT
Flat 6 Newman House SE5 7TS
Flat 5 Newman House SE5 7TS

3a Parkhouse Street London SE5 7TQ

13a Parkhouse Street London SE5 7TQ
11a Parkhouse Street London SE5 7TQ
37a Parkhouse Street London SE5 7TQ
9a Parkhouse Street London SE5 7TQ
7a Parkhouse Street London SE5 7TQ
5a Parkhouse Street London SE5 7TQ
33b Southampton Way London SE5 7SW
33a Southampton Way London SE5 7SW
31a Southampton Way London SE5 7SW
39a Southampton Way London SE5 7SW
41b Southampton Way London SE5 7SW
41a Southampton Way London SE5 7SW
39b Southampton Way London SE5 7SW
21a Southampton Way London SE5 7SW
19b Southampton Way London SE5 7SW
19a Southampton Way London SE5 7SW
23a Southampton Way London SE5 7SW
29a Southampton Way London SE5 7SW
27a Southampton Way London SE5 7SW
23b Southampton Way London SE5 7SW
43a Southampton Way London SE5 7SW
Flat B 35 Rainbow Street SE5 7TB
Flat B 31 Rainbow Street SE5 7TB
Flat A 35 Rainbow Street SE5 7TB
Flat A 52 Rainbow Street SE5 7TD
Flat B 52 Rainbow Street SE5 7TD
Flat A 56 Rainbow Street SE5 7TD
Flat A 54 Rainbow Street SE5 7TD
115 Wells Way London SE5 7SZ
87a Southampton Way London SE5 7SX
43b Southampton Way London SE5 7SW
11a Dowlas Street London SE5 7TA
Flat A 31 Rainbow Street SE5 7TB
Flat A 19 Rainbow Street SE5 7TB
11b Dowlas Street London SE5 7TA
Flat 17 Hodgkin Court SE5 7FN
Flat 5 73 Wells Way SE5 7GD
Flat 3 73 Wells Way SE5 7GD
Flat 1 73 Wells Way SE5 7GD
Flat 6 73 Wells Way SE5 7GD
75 Wells Way London SE5 7GA
65 Wells Way London SE5 7GA
61 Wells Way London SE5 7GA
88 Tower Mill Road London SE15 6BP
67 Wells Way London SE5 7GA
71 Wells Way London SE5 7GA
70 Wells Way London SE5 7GA
68 Wells Way London SE5 7GA
16 Benhill Road London SE5 7PT

Flat 34 Hambling Court SE5 7TT
Flat 33 Hambling Court SE5 7TT
Flat 32 Hambling Court SE5 7TT
Flat 23 Hambling Court SE5 7TT
Flat 22 Hambling Court SE5 7TT
Flat 21 Hambling Court SE5 7TT
Flat 24 Hambling Court SE5 7TT
Flat 27 Hambling Court SE5 7TT
Flat 26 Hambling Court SE5 7TT
Flat 25 Hambling Court SE5 7TT
Room 11 75-77 Southampton Way SE5 7SW
Unit Three And Ground Floor Unit Four And First Floor Unit
Five Burgess Industrial Estate SE5 7TQ
12 Cottage Green London SE5 7ST
10 Cottage Green London SE5 7ST
149a Southampton Way London SE5 7EW
14a Coleman Road London SE5 7TG
Flat 8 Windmill Court SE5 7FG
Flat 7 Windmill Court SE5 7FG
Living Accommodation 156 Wells Way SE5 7SY
Maisonette Basement And Ground Floors 73b Southampton
Way SE5 7SW
Maisonette First And Second Floors 73a Southampton Way
SE5 7SW
Ground Floor 125 Southampton Way SE5 7EW
14 Cottage Green London SE5 7ST
Flat 1 Hambling Court SE5 7TT
16 Durfey Place London SE5 7QD
Flat 2 Hambling Court SE5 7TT
Flat 5 Hambling Court SE5 7TT
Flat 4 Hambling Court SE5 7TT
Flat 3 Hambling Court SE5 7TT
Flat 8 To 9 14 Coleman Road SE5 7TG
Flat 3 To 4 14 Coleman Road SE5 7TG
15 Durfey Place London SE5 7QD
14 Durfey Place London SE5 7QD
2 Cottage Green London SE5 7ST
Park Office Chumleigh Gardens SE5 0RJ
204 Camberwell Grove London SE5 8RJ
Se5 Forum
Bcm Scaffolding 69 Southampton Way SE5 7SW
Flat 3 133 Southampton Way SE5 7EW
7 Parkhouse Street London SE5 7TQ
Wells Way Camberwell Se5 7sz
133 A Wells Way London SE5 7SZ
69 Coleman Road London SE5 7TF
Flat 11 Leigh Court 1 Sam King Walk SE5 7FP
133a Wells Way London SE5 7SZ
14 Addington Square London SE5 7JZ
47 Southampton Way London SE5 7SW
3 Tilson Close London SE5 7TZ
41a Southampton Way London SE5 7SW
68 Coleman Road London SE5 7TG
18 Rainbow St London SE5 7TD
34 Kemerton Road SE5 9AR
52 Vicarage Grove London SE5 7LP
58 Colman Road London SE5 7TG
5 Claremont Villas Southampton Way SE5 7SS
2 Coleman Road London SE5 7TG
109 Wells Well Wells Way SE5 7SZ
14 Barrett Court 1 Dobson Walk SE5 7FL
9 Palfrey Court 74 Edmund Street SE5 7NR
109 Wells Way London SE5 7SZ
Flat 14 Sunset Buildings London SE5 7NR
38a Coleman Road Camberwell SE5 7TG
6 Claremont Villas Southampton Way SE5 7SS
Flat B 32 Coleman Road SE5 7TG
107 Wells Way London SE5 7SZ
30 Hambling Court 42 Southampton Way SE5 7TT
101 Wells Way London SE5 7SZ
13 Barrett Court 1 Dobson Walk SE5 7FL
128 Benhill Road London SE5 7LZ
3a Parkhouse Street London SE5 7TQ

79a Southampton Way London SE5 7SW
79b Southampton Way London SE5 7SW
18 Benhill Road London SE5 7PT
24 Benhill Road London SE5 7PT
22 Benhill Road London SE5 7PT
20 Benhill Road London SE5 7PT
Ground Floor Flat 89 Southampton Way SE5 7SW
67 Southampton Way London SE5 7SW
Unit 10 Burgess Industrial Park SE5 7TJ
Ground Floor Flat 103 Southampton Way SE5 7SX
89 Edmund Street London SE5 7NF
85 Edmund Street London SE5 7NF

117 Coleman Road London SE5 7TF
91 Coleman Road London SE5 7TF
91 Coleman Road London SE5 7TF
13 Parkhouse St London SE5 7TQ
3a Parkhouse Street London SE5 7TQ
Flat 53 Andoversford Court SE15 6AF
13 Leigh Court 1 Sam King Walk SE5 7FP
42 Camberwell Grove London SE5 8RE
Flat 5, Goschen House, 68 Peckham Road SE5 8QE
13 Addington Square London SE5 7JZ
19 Addington Square London SE5 7JZ
Flat 6 Malswick Court Tower Mill Road SE15 6FX

APPENDIX 2

Consultation responses received

Internal and external consultees - see summary in main report.

Neighbour consultee responses

Bcm Scaffolding 69 Southampton Way SE5 7SW
Camberwell 4 Brunswick Villas SE5 7RR
First Floor Flat 4 Claremont Villas SE5 7SS
First Floor Flat 4 Claremont Villas SE5 7SS
Flat A 36 Coleman Road SE5 7TG
Flat A 38 Coleman Road SE5 7TG
Flat B 32 Coleman Road SE5 7TG
Flat B 32 Coleman Road SE5 7TG
Flat 1, 113 Wells Way London SE5 7SZ
Flat 1 113 Wells Way SE5 7SZ
Flat 1 56 Coleman Road SE5 7TG
Flat 1 56 Coleman Road SE5 7TG
Flat 10 Ayres Court SE5 7FA
Flat 11 Evison House SE5 7FT
Flat 11 Leigh Court SE5 7FP
Flat 11 Leigh Court 1 Sam King Walk SE5 7FP
Flat 11 Leigh Court 1 Sam King Walk SE5 7FP
Flat 11 Leigh Court 1 Sam King Walk SE5 7FP
Flat 14 Sunset Buildings London SE5 7NR
Flat 2 113 Wells Way SE5 7SZ
Flat 2 113 Wells Way SE5 7SZ
Flat 2 113 Wells Way SE5 7SZ
Flat 2 56 Coleman Road SE5 7TG
Flat 21 Hodgkin Court SE5 7FN
Flat 23 Hodgkin Court SE5 7FN
Flat 23 Leigh Court SE5 7FP
Flat 24 60 St Georges Way SE15 6QR
Flat 24 60 St Georges Way SE15 6QR
Flat 26 Keats House Ellington Estate SE5 7JA
Flat 28 Hodgkin Court SE5 7FN
Flat 3 Evison House SE5 7FT
Flat 3 133 Southampton Way SE5 7EW
Flat 30 Hambling Court SE5 7TT
Flat 4 113 Wells Way SE5 7SZ
Flat 4, 129 Southampton Way London SE5 7EW
Flat 5, Goschen House, 68 Peckham Road SE5 8QE
Flat 5 113 Wells Way SE5 7SZ
Flat 5 113 Wells Way SE5 7SZ
Flat 53 Andoversford Court SE15 6AF
Flat 6 Hodgkin Court SE5 7FN
Flat 6 Malswick Court Tower Mill Road SE15 6FX
Flat 6 56 Coleman Road SE5 7TG
Flat 7 Hodgkin Court SE5 7FN
Flat 9 Evison House SE5 7FT
Flat 9 59 Wells Way SE5 7UB
Garnies Close Southwark SE15 6HW
London House 7 Chapel St TR2 4LD
Maisonette On Ground And Lower Ground Floors 97 Camberwell Grove SE5 8JH

133 A Wells Way London SE5 7SZ
133 A Wells Way London SE5 7SZ
133a Wells Way London SE5 7SZ
133a Wells Way London SE5 7SZ
14 Addington Square London SE5 7JZ
14 Addington Square London SE5 7JZ
14 Addington Square London SE5 7JZ
14 Barrett Court 1 Dobson Walk SE5 7FL
143 Southampton Way London SE5 7EW
144 Benhill Road Camberwell SE5 7LZ
15 Rowan Court Southwark SE15 6PE
15 Sutherland Square London SE17 3EQ
16 Garnies Close Southwark SE15 6HW
16 Lamb House London SE5 7JF
16 Putney Park Lane London SW15 5HD
16 Rainbow Street London SE5 7TD
16 Rainbow Street London SE5 7TD
16 Rowan Court Southwark SE15 6PE
17 Sturdy Road London SE15 3RH
18 Lamb House London SE5 7JF
18 Rainbow St London SE5 7TD
18 Rainbow St London SE5 7TD
18 Rainbow St London SE5 7TD
18 Rainbow Street London SE5 7TD
18 Rainbow Street London SE5 7TD
18 Rainbow Street London SE5 7TD
185 New Kings Road London SW6 4SW
19 Addington Square London SE5 7JZ
2 Coleman Road London SE5 7TG
2 Coleman Road London SE5 7TG
2 Delft Way London SE22 8TR
2 Horsley Street Walworth SE17 2AU
20 Gately Court London SE15 6FB
20 Keats House London SE5 7JA
20 Marvell House London SE5 7JD
22 Ada Road SE5 7RW
22 Coleman Road London SE5 7TG
23 Gately Court London SE15 6FB
23 Hodgkin Court 2 Dobson Walk SE5 7FN
23b Southampton Way London SE5 7SW
24 Pullens Buildings London SE17 3SJ
249 Underhill Rd London SE22 0PB
25 Rainbow Street London SE5 7TB
26 Landor House London SE5 7JE
27 Rainbow Street London SE5 7TB
29 East Surrey Grove London SE15 6EX
29 Lamb House London SE5 7JF
29 Rainbow Street London SE5 7TB
29 Rainbow Street London SE5 7TB
3 Claremont Villas Southampton Way SE5 7SS
3 Cronin Street London SE15 6JJ
3 Garnies Close Southwark SE15 6HW
3 Parkhouse Street London SE5 7TQ
3 Parkhouse Street London SE5 7TQ
3 Tilson Close London SE5 7TZ
3a Parkhouse Street London SE5 7TQ
3a Parkhouse Street London SE5 7TQ
3a Parkhouse Street London SE5 7TQ

3a Parkhouse Street London SE5 7TQ
3a Parkhouse Street London SE5 7TQ
30 Blackthorne Court Southwark SE15 6PD
30 Coleman Road London SE5 7TG
30 Cronin Street London SE15 6JJ
30 Hambling Court 42 Southampton Way SE5 7TT
30 Rainbow Street London SE5 7TD
31 Keats House London SE5 7JA
31 Pentridge Street Southwark SE1 6JN
31 Pentridge Street Southwark SE15 6JF
31 Portland Street London SE17 2PG
32 Garnies Close Southwark SE15 6HW
33 Hawkslade Rd London SE15 3DQ
33 Rainbow Street London SE5 7TB
33 Rowan Court Southwark SE16 6HI
34 Gateley London SE15 6FB
34 Kemerton Road SE5 9AR
35 Pentridge Street Southwark SE15 6JF
36 Rainbow Street London SE5 7TD
37 Rainbow Street Camberwell SE5 7TB
37 Rainbow Street London SE5 7TB
37 Rainbow Street London SE5 7TB
38 Addington Square London SE5 7LB
38 Rainbow Street London SE5 7TD
38 Rainbow Street London SE5 7TD
38a Coleman Road Camberwell SE5 7TG
39b Southampton Way London SE5 7SW
4 Dowlas Street London SE5 7TA
4 Rowan Court Southwark SE15 6PE
40 Pentridge Street Southwark SE15 6JE
41 East Surrey Grove Southwark SE15 6EB
41 Southampton Way London SE5 7SW
41a Southampton Way London SE5 7SW
41a Southampton Way London SE5 7SW
42 Camberwell Grove London SE5 8RE
42 Camberwell Grove London SE5 8RE
42 Garnies Close Southwark SE15 6HW
42 Southampton Way London SE5 7TT
44 Gateley Court London SE15 6FB
44 Rainbow Street London SE5 7TD
44 Rainbow Street London SE5 7TD
47 Arments Court 392 Albany Road SE5 0DF
47 Arments Court 392 Albany Road SE5 0DF
47 Bellwood Road London SE15 3DE
47 Southampton Way London SE5 7SW
48 East Surrey Grove Peckham SE15 6EB
49 Rowan Court Southwark SE15 6PE
5 Claremont Villas Southampton Way SE5 7SS
5 Lamb House London SE5 7JF
5 Parkhouse Street London SE5 7TQ
5 Parkhouse Street London SE5 7TQ
5 Soane House Roland Way SE17 2JF
5a Parkhouse Street London SE5 7TQ
50 Coleman Rd Camberwell SE5 7TG
50 Coleman Road London SE5 7TG

50 Rainbow Street London SE5 7TD
52 Pentridge Street London SE15 6JE
52 Vicarage Grove London SE5 7LP
54 Pentridge Street London SE15 6JE
56 Culverden Rd London SW12 9LS
56 Southampton Way London SE5 7TT
58 Coleman Road London SE5 7TG
6 Claremont Villas Southampton Way SE5 7SS
6 Coleman Road London SE5 7TG
6 Dowlas Street London SE5 7TA
6 Lamb House London SE5 7JF
6 Tilson Close Coleman Road SE5 7TZ
62 Coleman Road London SE5 7TG
65 Wells Way London SE5 7GA
65 Wells Way London SE5 7GA
67a Trinity Church Square London SE1 4HT
68 Coleman Road London SE5 7TG
68 Coleman Road London SE5 7TG
69 Coleman Road London SE5 7TF
69 Coleman Road London SE5 7TF
69 Coleman Road London SE5 7TF
7 Amstel Court Southwark SE15 6LN
7 Parkhouse Street London SE5 7TQ
7a Parkhouse Street London SE5 7TQ
75 Cronin Street London SE15 7JG
78 Coleman Road Camberwell SE5 7TG
79 Coleman Rd London SE5 7TF
79 Coleman Road London SE5 7TF
79 Cronin Street London SE15 6JG
8 Amstel Court Southwark SE15 6LN
8 Omega Gate London SE16 7PR
86 Tower Mill Road London SE15 6BP
9 Palfrey Court 74 Edmund Street SE5 7NR
9 Palfrey Court 74 Edmund Street SE5 7NR
9 Parkhouse Street London SE5 7TQ
9 Parkhouse Street London SE5 7TQ
91 Coleman Road London SE5 7TF
91 Coleman Road London SE5 7TF
95 Southampton Way London SE5 7SX
97 Axminster Road London N7 6BS
97 Wells Way London SE5 7SZ

Appendix 3

Daylight and sunlight tables

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

Property	No of windows	Pass	% of total	Minor effect	Moderate effect	Major effect
1-6 Southampton Way	48	48	100	0	0	0
79 Southampton Way	5	5	100	0	0	0
1 - 12 Southampton Way	17	17	100	0	0	0
47 Southampton Way	27	15	56	0	1	11
33-45 Southampton Way	41	41	100	0	0	0
1 Parkhouse Street	11	9	81	2	0	0
3 Parkhouse Street	12	10	83	0	2	0
5 Parkhouse Street	9	5	56	2	2	0
7 Parkhouse Street	10	5	50	3	2	0
9 Parkhouse Street	9	4	44	0	5	0
11 Parkhouse Street	11	6	55	0	5	0
13 Parkhouse Street	17	7 (6)	41 (35)	1 (2)	5 (6)	4 (3)
77-81 Wells Way	6	6	100	0	0	0
83 Wells Way	2	2 (1)	100 (50)	0 (1)	0	0
85 Wells Way	2	1	50	1	0	0
87 Wells Way	2	1	50	0	1	0
89 Wells Way	2	1	50	0	1	0
91 Wells Way	2	0	0	0 (1)	2 (1)	0
93 Wells Way	2	0	0	0	2	0
95 Wells Way	2	0	0	0	1	1
97 Wells Way	4	0	0	0	0	4
99 Wells Way	3	0	0	0	0	3
101 Wells Way	3	0	0	0	0	3
103 Wells Way	3	0	0	0	2	1
105 Wells Way	3	0	0	0	2	1
107 Wells Way	3	0	0	0	2	1
109 Wells Way	3	0	0	0	2	1
111 Wells Way	3	0	0	0	2	1
113 Wells Way	13	6	46	3	3	1
115 Wells Way	9	8	89	1	0	0
1 - 3 Cottage Green (Collingwood House)	13	13	100	0	0	0
8-14 Cottage Green	13	13	100	0	0	0
Totals	310	223 (221)	72 (71)	13 (16)	42 (42)	32 (31)

Existing baseline V. Proposed No Sky Line and cumulative ()

Property	No of rooms	Pass	% of total	Minor effect	Moderate effect	Major effect
1-6 Southampton Way	24	24	100	0	0	0
79 Southampton Way	5	4	80	0	1	0
1 - 12 Southampton Way	16	15	94	1	0	0
47 Southampton Way	17	7	41	1	1	8
45 Southampton Way	3	1	33	0	2	0
33-43 Southampton Way	35	35	100	0	0	0
1 Parkhouse Street	7	6	86	1	0	0
3 Parkhouse Street	8	7	88	0	1	0
5 Parkhouse Street	7	6	86	0	1	0
7 Parkhouse Street	7	6	86	0	1	0
9 Parkhouse Street	7	6	86	0	1	0
11 Parkhouse Street	8	6	75	0	2	0
13 Parkhouse Street	9	4	44	0 (2)	3 (1)	2
77 Wells Way	2	2	100	0	0	0
79 Wells Way	2	1	50	1	0	0
81 Wells Way	2	0	0	2	0	0
83 Wells Way	2	0	0	1	1	0
85 Wells Way	2	0	0	1	1	0
87 Wells Way	2	0	0	0	1	1
89 Wells Way	2	0	0	0	2	0
91 Wells Way	2	0	0	0	0	2
93 Wells Way	2	0	0	0	0	2
95 Wells Way	2	0	0	0	0	2
97 Wells Way	2	1	50	1	0	0
99 Wells Way	2	0	0	1	0	1
101 Wells Way	2	0	0	0	1	1
103 Wells Way	2	0	0	1	0	1
105 Wells Way	2	1	50	0	0	1
107 Wells Way	2	1	50	0	0	1
109 Wells Way	2	1	50	0	0	1
111 Wells Way	2	1	50	0	0	1
113 Wells Way	8	3	38	2	0	3
115 Wells Way	6	6	100	0	0	0
1 - 3 Cottage Green (Collingwood House)	5	5	100	0	0	0
8-14 Cottage Green	10	10	100	0	0	0
Totals	218	159	73	13 (15)	19 (17)	27

Existing baseline V. Annual Probable Sunlight Hours and cumulative ()

Property	No of rooms	Pass	% of total	Minor effect	Moderate effect	Major effect
6 Southampton Way	1	1	100	0	0	0
47 Southampton Way	1	1	100	0	0	0
43 Southampton Way	5	5	100	0	0	0
1-13 Parkhouse Street	43	43	100	0	0	0
77 Wells Way	2	1	50	1 (0)	0	0
79 Wells Way	2	2	100	0	0	0
81 Wells Way	2	1	50	0 (1)	1 (0)	0
83 Wells Way	2	2	100	0	0	0
85 Wells Way	2	1	50	0	0	1
87 Wells Way	2	2	100	0	0	0
89 Wells Way	2	1	50	0	0	1
91 Wells Way	2	2	100	0	0	0
93 Wells Way	2	1	50	0	0	1
95 Wells Way	2	1	50	0	0	1
97-113 Wells Way	38	38	100	0	0	0
115 Wells Way	9	8	89	0	0	1
1 - 3 Cottage Green (Collingwood House)	2	2	100	0	0	0
Totals	119	112	94	1 (1)	1 (0)	5