

Item No. 5.2	Classification: Open	Date: 4 December 2018	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 17/AP/4819 for: Full Planning Application</p> <p>Address: LAND AT 313-349 ILBERTON ROAD, LONDON SE15</p> <p>Proposal: ORIGINAL DESCRIPTION Mixed use redevelopment comprising, demolition of existing buildings and construction of two buildings: one of part 11 and 13 storeys and one of part 13 and 15 storeys to provide 1,888sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (51 x 1 bed, 52 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled and commercial car parking and refuse/recycling stores.</p> <p>REVISED DESCRIPTION Full application for full planning permission for mixed use redevelopment comprising: Demolition of existing buildings and construction of two buildings one of part 11 and 13 storeys and one of part 13 and 15 storeys to provide 1,661sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (44 x 1 bed, 59 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled and commercial car parking and refuse/recycling stores.</p> <p>(This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).</p>		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning		
Application Start Date 02/01/2018		Application Expiry Date 03/04/2018	
Earliest Decision Date		03/06/2018	

RECOMMENDATION

1. That the Planning Committee grant planning permission, subject to:
 - The recommended planning conditions;
 - The applicant entering into an appropriate legal agreement by no later than 27 April 2019;

- Referral to the Mayor of London.
 - Referral to the Secretary of State
2. In the event that the s106 agreement is not completed by 27 April 2019 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 167 of this report.

EXECUTIVE SUMMARY

3. This major application seeks to redevelop an existing light industrial and distribution site on the eastern side of Ilderton Road to provide a mixed-use commercial and residential development of 130 units and 1661sqm of B1 commercial floorspace. The scheme is located in a Strategic Preferred Industrial Location and would represent a departure from policy by virtue of proposing the introduction of residential accommodation to a Preferred Industrial Location.
4. The applicant has committed to providing 36% affordable housing by habitable rooms which equates to 46 affordable units, with a proposed tenure split of 70% social rented and 30% intermediate by habitable rooms. There would be the potential for a significant uplift in jobs on the site through the provision of good quality, flexible commercial space that has been specifically designed for B1 Use and would include units of varying size and improved servicing arrangements. There would be a small loss of 202sqm commercial floorspace as a result of the proposal that would be mitigated by an improved internal layout and public realm design, plus a financial contribution.
5. The proposal would include two buildings of up to 15-storeys in height and would be of a high quality of design, and deliver the master-planning and aspirations of the draft Old Kent Road Area Action Plan. A policy compliant mix of dwellings and wheelchair housing would be provided, together with a good standard residential accommodation. The daylight and sunlight impacts are noted, but it is considered that would only be limited harm caused to existing residential amenity as a consequence of the development. Sound proofing within the new dwellings would limit the potential for noise complaints against future commercial occupiers.
6. The proposal would be car free apart from 3 accessible parking spaces, and future occupiers would be prevented from obtaining parking permits on the surrounding streets. The proposed development should result in a reduction of two-way vehicular traffic. A s106 contribution would be required to improve local bus capacity.
7. 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.
8. Overall, the clear benefits of the proposal are considered to outweigh the limited 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

9. The application site is roughly rectangular in shape and the combined area measures approximately 0.1974 acres (0.1974 hectares).
10. 313-320 Ilderton Road is currently in use as a tyre dealer's yard, Euro Tyres. 321-343 is occupied by leaflet distribution services business, LDS (Leaflet Distribution Services), specialising in the distribution of advertising material across the UK. 344-349 Ilderton Road is currently in use as a builder's merchant yard, Floyds Builders Merchant.
11. The site is bounded by Ilderton Road to the west, Wagner Street to the south and the railway viaduct and associated arches and embankment to the east. The surrounding area comprises a mixture of buildings used for industrial and commercial purposes and high density residential blocks on Tustin Estate. A church, the Redeemed Christian Church of God is located on the southern side of Wagner Street at 30 Wagner Street. The site is predominantly covered by one and two storey buildings, associated structures and yard space, with a high boundary wall fronting Ilderton Road and Wagner Street
12. The site is not located within a Conservation Area, nor is it within the setting of a Listed Building. It is not located within a protected borough view, but does fall within the background of London View Management Protected Vista of 2A.1, which protects views from Parliament Hill Summit to St. Paul's Cathedral. The borough boundary between Southwark and Lewisham runs along the eastern edge of the site. No part of the application site is located within Lewisham.

Details of proposal

13. The proposals involve demolition of all the existing commercial buildings and structures to allow for a mixed use building with employment and residential uses.
14. The employment uses would be provided at ground floor and first floor in the form of ten workspaces capable of use by small to medium sized enterprises, start up and creative type businesses within the B1 use class.
15. Overall, there would be slight decrease in the employment floorspace re-provision when compared to the existing provision as detailed below:

Table - employment provision

	Existing	Proposed	Difference
	338sqm floorspace	1661sqm floorspace	+1323sqm
	1783sqm yard area	260sqm yard area	-1523sqm
Total	2121sqm	1919sqm	-202sqm

16. It should be noted that the originally submitted scheme was policy compliant in terms of re-provision of floorspace (2148sqm). However, following discussions with officers to improve and amend the internal layout, increase the footway widths and improve the

elevational designs fronting Ilderton Road, the quantum of floorspace was reduced by these officer-requested design amendments to a non-compliant level.

17. It is officers' view that the scheme has been significantly enhanced by these improvements and the proposed quantum of floorspace is therefore considered acceptable in this instance and in relation to the design amendments achieved.
18. A financial contribution will be sought to mitigate this modest under provision of employment floorspace
19. In terms of residential provision, 130 new residential units which consists of 84 private units and 46 affordable units. The affordable units would be split between 31 units for social rent and 15 units intermediate/shared ownership.
20. The proposed affordable housing offer equates to a total of 136 habitable rooms or 36.4% of the 373 habitable rooms.
21. A 35% habitable rooms offer would equate to 130.6 affordable habitable rooms, with 70% social rent requiring 91.4 habitable rooms, and 30% Intermediate requiring 39.2 habitable rooms to be policy compliant.
22. The proposed 36.4% habitable rooms offer equates to 94 social rent habitable rooms and 42 Intermediate habitable rooms for a total of 136 affordable habitable rooms. The proposed offer would therefore exceed the 70/30 affordable tenure split for a policy compliant affordable housing offer.
23. The proposal consists of two linked buildings, one part 11 and 13 storeys and one of part 13 and 15 storeys that are linked by a two storey podium. Two small basements are proposed beneath the two residential cores.



Figure 1: CGI view of proposed scheme along Ilderton Road (north ward view^)



Figure 2: CGI view of proposed scheme along Ilderton Road (south ward view^)

24. Amenity space would be provided in the form of projecting private balconies, communal amenity space and children's play space.
25. The proposal would be car free apart from three accessible disabled parking spaces which would be introduced on the northern side of the site, accessible from Ilderton Road.
26. Servicing for the residential and commercial units would be from two new loading bays and increased width footways on Ilderton Road adjacent to the residential cores of the two proposed buildings. A repositioned bus stop is located between the two
27. Enhancements to the public realm are proposed in the form of new public open space, tree planting and the widening existing footways.
28. Additional supporting information was submitted during the course of the application in relation to affordable workspace and viability information was also submitted to support the delivery of 36% affordable housing.

Revisions to the scheme

29. Following discussions with officers, the proposed scheme was revised to optimise the use of site in relation to design and materials of the buildings' elevations, internal layouts, residential unit mix, ground floor street frontage, public realm, car parking and servicing. The amount of proposed commercial floorspace within the scheme reduced as a result of the negotiations with officers.
30. The scheme remains broadly consistent with the master-planning and massing identified within the Further Preferred Option of the Old Kent Road Area Action Plan

(AAP). The AAP also acknowledges the potential for additional height at the southern end of Ilderton Road at a scale similar in height to the existing towers of the Tustin Estate.

31. A second stage of statutory consultation was undertaken on the revised scheme.

Planning history

32. 12/AP/1936 Application type: Full Planning Application (FUL)
Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8).
Decision date 14/09/2012 Decision: Granted (GRA)

14/AP/0107 Application type: Approval of Details - Article 30 DMPO (AOD)
Details of a programme of archaeological evaluation works pursuant to Condition 4 of planning permission 12-AP-1936 for: Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8).
Decision date 04/04/2014 Decision: Granted (GRA)

14/AP/2115 Application type: Approval of Details - Article 30 DMPO (AOD)
Details of a programme of archaeological evaluation works pursuant to Condition 4 of planning permission 12-AP-1936 for: Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8).
Decision date 19/08/2014 Decision: Granted (GRA)

16/AP/0831 Application type: Full Planning Application (FUL)
Minor amendment to planning permission 12-AP-1936 for: 'Construction of a new two storey building to accommodate replacement builders merchant shop (Use Class A1), office (Use Class B1) and storage (Use Class B8)' to allow for additional storage above drive through and elevational alterations including the addition of a new roller shutter
Decision date 28/04/2016 Decision: Granted (GRA)

17/EQ/0114 Application type: Pre-Application Enquiry (ENQ)
Redevelopment of site to provide student accommodation (sui generis as 118 clusters and 230 studios), flexible workspace (405sqm) and cafe (103sqm) at ground floor in a building of 5-19 storeys, and ancillary accommodation comprising bin store, bikes store, student amenity space.
Decision date 12/04/2017 Decision: Pre-application enquiry closed (EQC)

17/EQ/0096 Application type: Pre-Application Enquiry (ENQ)
Construction of 1 x 10 storey and 1 x 20 storey mixed use buildings consisting of commercial and residential flats (122 units).
Decision date 10/05/2017 Decision: Pre-application enquiry closed (EQC)

Pre-application

33. A number of pre-application discussions were held on previous schemes and in relation to the current scheme now under consideration, the details of which are held electronically by the Local Planning Authority. The main matters discussed focused

on the layout of the site, employment uses, affordable housing, building heights and massing, and servicing.

Planning history of adjoining sites

180 Ilderton Road

34. 17/AP/4546

Planning permission granted subject to legal agreement on 21/03/2018 for:

Demolition of existing building and erection of a part 5, 8 and 9 storey plus basement mixed-use development (max height 29.98m) comprising 2,351 sqm (gia) of flexible workspace (Use Class B1) and 84 residential apartments (Use Class C3) with associated amenity space and ancillary infrastructure.

60a and 62 Hatcham Road and 134-140 Ilderton Road

35. 17/AP/3757

Planning permission granted subject to legal agreement on 6/11/2018 for:

Application for full planning permission for mixed use redevelopment comprising: demolition of existing buildings and construction of a building ranging in height from four to nine storeys to provide 1,179 sqm (GIA) of commercial space (use class B1) at ground floor, 86 residential dwellings above (30 x 1 bed, 39 x 2 bed and 17 x 3 bed), with associated amenity areas, cycle and disabled car parking and refuse/recycling stores.

1 White Post Street, Lewisham

36. DC/17/104772.

Planning permission to be determined for:

The demolition of the existing structures at 1 White Post Street SE15 and redevelopment to provide a mixed use development comprising the construction of two buildings ranging from 3-7 storeys and refurbishment of the 6 railway arches (No's 62 - 67), providing 975 sqm of flexible commercial floorspace (A1/A2/B1/D1) and 25 residential units; together with the provision of associated plant, amenity space, 2 accessible car parking spaces and 56 cycle spaces.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

37. The main issues to be considered in respect of this application are:

- Principle in terms of land use, including consideration of emerging policy for the Old Kent Road Opportunity Area;
- Environmental impact assessment;
- Affordable housing;
- Design issues, including height, scale and massing;
- Housing mix;
- Quality of accommodation;

- Impact upon the amenity of neighbouring residential and commercial occupiers and the surrounding area;
- Commercial workspace
- Transport issues;
- Impact on trees;
- Planning obligations (Section 106 Undertaking or Agreement);
- Sustainable development implications;
- Other matters

Planning policy

- 38.
- Old Kent Road Preferred Industrial Location -Strategic
 - Old Kent Road Action Area
 - Urban density zone
 - Archaeological priority zone
 - Air quality management area
 - Flood Risk Zone 3
 - Bermondsey Lake Archaeological Priority Zone

National Planning Policy Framework (the Framework)

39. National planning policy is set out in the revised National Planning Policy Framework ('the NPPF'), published on 24 July 2018. The NPPF focuses on a presumption in favour of sustainable development, of which there are three strands; economic, social and environmental. The core planning principles include, amongst others, the requirement to 'drive and support development'.
40. Paragraph 48 of the revised NPPF states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The council is preparing the New Southwark Plan (NSP) and OKR AAP which are emerging policy documents. The new London Plan is also in draft form. The weight that can be afforded to these emerging documents is discussed in greater detail in paragraphs 49 - 54 of this report.

Section 1 - Building a strong, competitive economy

Section 4 - Promoting sustainable transport

Section 6 - Delivering a wide choice of high quality homes

Section 7 - Requiring good design

Section 8 - Promoting healthy communities

Section 10 - Meeting the challenge of climate change, flooding and coastal change

Section 11 - Conserving and enhancing the natural environment

Section 12 - Conserving and enhancing the historic environment

National Planning Policy Guidance (2014)

The London Plan 2016

41. The London Plan is the regional planning framework and was adopted in 2016:

Policy 2.17 Strategic Industrial locations

Policy 3.3 Increasing housing supply

Policy 3.5 Quality and design of housing developments

Policy 3.6 Children and young people's play and informal recreation facilities
 Policy 3.8 Housing choice
 Policy 3.9 Mixed and balanced communities
 Policy 3.10 Definition of affordable housing
 Policy 3.11 Affordable housing targets
 Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
 Policy 3.13 Affordable housing thresholds
 Policy 4.3 Mixed use development and offices
 Policy 4.4 Managing industrial land and premises
 Policy 5.7 Renewable energy
 Policy 5.8 Innovative energy technologies
 Policy 5.11 Green roofs and development site environs
 Policy 5.12 Flood risk management
 Policy 5.13 Sustainable drainage
 Policy 5.21 Contaminated land
 Policy 6.9 Cycling
 Policy 6.10 Walking
 Policy 6.13 Parking
 Policy 7.2 An inclusive environment
 Policy 7.3 Designing out crime
 Policy 7.4 Local character
 Policy 7.6 Architecture
 Policy 7.7 Location and Design of Tall and Large Buildings
 Policy 7.8 Heritage assets and archaeology
 Policy 7.21 Trees and woodlands
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy

42. The London Plan 2016 identifies the Old Kent Road as an Opportunity Area with “significant potential for residential – led development along the Old Kent Road corridor” and identified an indicative employment capacity of 1,000 and a minimum of 2,500 new homes. Opportunity areas are described in the London Plan 2016 as London’s major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.
43. Policy 2.13 in the London Plan 2016 sets out the strategic policy for the development and intensification of opportunity areas. Annex 1 includes an indicative capacity for Old Kent Road of 2,500 homes and 1,000 jobs and supports the development of a planning framework to realise the area’s full growth potential. It goes on to state that the employment and minimum homes figures should be explored further and refined in a planning framework for the area and through a review of the Strategic Industrial Location and capacity to accommodate a phased rationalisation of its functions in the opportunity area or a provision elsewhere.

Core Strategy 2011

44. Strategic policy 1 - Sustainable development
 Strategic policy 2 - Sustainable transport
 Strategic policy 5 - Providing new homes
 Strategic policy 6 - Homes for people on different incomes

Strategic policy 7 - Family homes
Strategic policy 10 - Jobs and businesses
Strategic policy 11 - Open spaces and wildlife
Strategic policy 12 - Design and conservation
Strategic policy 13 - High environmental standards
Strategic policy 14 - Implementation and delivery

Southwark Plan (2007) - Saved policies

45. The adopted local plan for Southwark includes the saved policies from the 2007 Southwark Plan in addition to the 2011 Core Strategy including its strategic policies.
46. The council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

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

Supplementary Planning Documents

47. Sustainable design and construction SPD (2009)
Sustainability assessments SPD (2009)
Sustainable Transport SPD (2010)

Affordable housing SPD (2008 - Adopted and 2011 - Draft)
Residential Design Standards SPD (2011 and 2015)
Section 106 Planning Obligations and Community Infrastructure Levy (2015)
Development Viability SPD (2016)

Greater London Authority Supplementary Guidance

48. Housing SPG (2016)
London View Management Framework (2012)
London's World Heritage Sites SPG (2012)
Providing for Children and Young People's Play and Informal Recreation (2008)
Use of planning obligations in the funding of Crossrail (2010)
Affordable Housing and Viability SPG (2017)

Emerging Policy

Draft New London Plan

49. 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. The draft New London Plan identified the Old Kent Road as having a minimum capacity for housing of 12,000 and a jobs target of 5,000.

Old Kent Road Area Action Plan (OKR AAP)

50. The council is preparing an Area Action Plan/Opportunity Area Planning Framework for Old Kent Road (AAP/OAPF) which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. Consultation has been underway for 3 years, with a first draft published in 2016. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2017 and concluded consultation on 21st March 2018. As the document is still in draft form, it can only be attributed very limited weight.
51. Whilst acknowledging this very limited weight, members are advised that the draft OKR AAP places the application site within the proposed Action Area Core, and within proposal site OKR 16 which covers the Hatcham and Ilderton Road area. Requirements for this allocation site include replacement of existing employment floor space, provision of housing and on-site servicing.

New Southwark Plan

52. 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). Similarly with the OKR AAP, as the NSP is not yet adopted policy, it can only be attributed limited weight.
53. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance "arguments that an application is premature are unlikely to

justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

- (a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
- (b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

54. Refusal of planning permission on grounds of prematurity will seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.”

Principle of development

55. The site is located in the Preferred Industrial Location-Strategic (SPIL) which is an industrial location of strategic importance as identified in the Core Strategy and the London Plan. Introducing housing here would therefore represent a departure from the adopted Southwark and London Plan. The proposal also involves the loss of 202sqm of existing commercial floorspace, which would be contrary to strategic policy 10 of the Core Strategy and saved policy 1.2 of the Southwark Plan. Saved policy 5 is also relevant which encourages provision and replacement of small business units.
56. Strategic policy 10 of the Core Strategy states that the SPIL will be protected for industrial and warehousing uses. The Core Strategy does, however, recognise that structural changes in the economy are resulting in a declining need for industrial land in London. The Core Strategy also recognises that diversifying the range of job opportunities in the industrial locations into new sectors would benefit local people. Further, it sets out the future direction of Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP).
57. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in SPILs are B class uses and other sui generis uses which are inappropriate in residential areas.
58. London Plan policy 2.17 seeks to promote, manage and where appropriate, protect the Strategic Industrial Land as London’s main reservoir of industrial and related capacity, which includes general and light industrial uses. It states that developments on Strategic Industrial Land should be refused unless they provide for broad industrial type activities, are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework, meet the needs of small to medium sized enterprises or provide for small scale ‘walk to’ services for industrial occupiers such as workplace crèches or cafes.
59. The London Plan designates the Old Kent Road as an opportunity area, with an

indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes, which has been increased to a minimum of 12,000 in the merging London Plan. It identifies the potential for residential-led development along the Old Kent Road corridor, with homes and jobs targets to be explored and further refined through the preparation of a planning framework and a review of the Old Kent Road Strategic Industrial Location.

The Old Kent Road Area Action Plan (OKR AAP)

60. The emerging OKR AAP sets targets of a total of 20,000 new homes and 10,000 new jobs as well as new infrastructure, including parks and schools. It proposes the release of a substantial part of the Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods, so that new and existing businesses are designed to co-exist with new homes.
61. The OKR AAP places the site within the proposed Action Area Core, and within proposal site OKR 16 which covers the Hatcham Road and Ilderton Road area.
62. Emerging policy AAP6 of the OKR AAP states that development must retain or increase the amount of B Class floorspace on site, accommodate existing businesses on site or in the wider Old Kent Road Opportunity Area or provide relocation options for businesses that would be displaced by redevelopment and result in an increase in the number of jobs provided. It also requires the workspace to be managed by a specialist provider and for an element of affordable workspace to be provided.
63. Paragraph 216 of the NPPF states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The New Southwark Plan and Old Kent Road Area Action Plan have been subject to extensive consultation however they have yet to be subject to independent examination and therefore the documents have limited weight. They do, however, provide an indication of the direction of travel for planning policy in the opportunity area.
64. In determining whether the principle of the proposed development would be acceptable in land use terms, specifically the introduction of housing in the SPIL and the net loss of 202sqm of employment floorspace, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused, and whether those benefits would therefore justify a departure from the adopted planning policy.
65. Officers consider that the key benefits arising from the proposal would be as follows.

Employment floorspace

66. The proposed scheme would deliver a 1661sqm of employment floorspace within a more efficient site layout that optimises the use of land across the site.
67. The employment uses would be provided at ground and first floor in the form of ten workspaces and associated yard area capable of use by small to medium sized enterprises, start up and creative type businesses.
68. The proposed commercial units fall within the B1 use class. To meet the policy requirements and to improve the likelihood of B1(c) occupiers leasing the units, it is recommended that the internal B1(c) fit out of the proposed commercial units would be

secured through condition and a clause in the Section 106 Agreement.

69. However, it is not considered necessary to limit the proposed workspace to B1(c) in this instance as the draft AAP recognises this site as appropriate for B1 (a), (b) and (c).

Job creation

70. The existing FTE employment levels on the site come to around 17 full time employees. The number of jobs generated within the proposed development has been calculated by applying the average job / floorspace ratio to the amount of floorspace proposed. (1,661sqm). This implies that the development would be expected to create between 40-157 direct jobs (FTE) allowing for a mix of a mix of B1 (a), (b) and (c). uses. This figure is calculated by applying the 'Managed Workspace' range set out in the latest Employment Density Matrix published by the HCA. This is an uplift of 23 and 140 FTE jobs.
71. Consequently, the scheme has the potential to generate a significant uplift in employment provision on site. The new workspaces would meet the needs of the SME and emerging creative sectors. This is a positive aspect of the proposal.
72. In addition to the direct operational employment, the retail, leisure and other expenditure of the residents of the proposed 130 dwelling units will support additional jobs in shops, restaurants and other services within the Old Kent Road area.
73. To mitigate the loss of 202 sqm of B class floorspace which would arise, a contribution of £1848.06 would be required towards skills and employment programmes in the borough, which in turn would help residents into employment. This has been calculated in accordance with the Council's Planning Obligations and CIL SPD and would be secured through the s106 agreement.

Business relocation and retention

74. The existing uses on the site are:
- 313-320 Ilderton Road
This part of the application site is currently in use as a tyre dealer's yard, Euro Tyres have a rolling lease and are working with Pedder commercial agents to secure their next move locally in south east London.
 - 321-343 Ilderton Road
This site is currently occupied by, LDS, a leaflet distribution services business specialising in the distribution of advertising material across the UK. LDS have a have a rolling lease and are also working with Pedder commercial agents to secure their next move locally in south east London.
 - 344-349 Ilderton Road
This part of the application site is currently in use as a builder's merchant yard. It is understood that the owner of Floyds Builders Merchants is willing to sell the site and is retiring.

75. Further details of the relocation and retention strategy will be secured by the legal agreement.

Affordable workspace

76. The applicant has agreed to provide an element of affordable workspace of 166sqm within the scheme comprising 10% of the commercial floorspace at rents of £12 per sq ft over a 15 year period. The rents would be subject to inflation over this time. The level of rent would make the space affordable to creative industries and businesses and ensure businesses that require low rents have the opportunity to lease space within the area.

Specialist workspace provider

77. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. The applicant has committed to managing the space themselves through their own established workspace management company. This can be secured through a section 106 planning obligation.

Provision of housing, including affordable housing

78. The scheme would provide 130 new residential units, including policy compliant affordable housing comprising social rented and intermediate units in terms of habitable rooms. There is a pressing need for housing in the borough. Policy 3.3 of the London Plan supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015-2025. This is reinforced through Strategic Policy 5 of the Core Strategy which requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. It would also be in accordance with emerging policy for the Old Kent Road Opportunity Area and the expectation of significant new housing provision.

Impact of the proposed residential use

79. It is recognised that the introduction of residential units could restrict and prejudice the operation of existing businesses in the area. Given the changing nature of the uses now carried out within the area, it is not felt that these businesses would be prejudiced and they could continue to operate and co-exist with the introduction of new residential uses provided schemes are well designed for this mix.
80. In addition the developer will provide, through an agreed S278 agreement, two new on street servicing bays that should ensure that this site has an improved servicing layout to accommodate a wide range of commercial users in the future without harming residential amenity or prejudicing those commercial uses. This is a key requirement of within the draft Area Action Plan and their provision is welcomed. Conditions are recommended in relation to noise and sound insulation within the building, and also in relation to servicing hours.
81. It is noted that residential accommodation within a mixed use context is already located within the immediate area. To the south of the site, residential units on Wagner Street with the Tustin Estate are located immediately opposite the site on the

western side of Ilderton Road.

Prematurity

82. The most up to date development plan pertinent to the Old Kent Road area is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing lead growth. The AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the New London Plan aspirations for industrial land and employment are addressed. This scheme is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London plan and the direction of travel of the draft New Southwark Plan and the 2016 and 2017 draft AAPs and the 2018 draft New London Plan. It is not therefore considered too be premature.

83.

Conclusion on land use

84. To conclude in relation to land uses, the proposed development would be contrary to strategic policy 10 of the Core Strategy owing to the introduction of residential into the SPIL would represent a departure from the adopted development plan.

85. This must therefore be weighed against the benefits of the scheme which include:

- the provision of housing, of which 36% would be affordable;
- Substantial re-provision of commercial floorspace, albeit at a small loss of 202sqm;
- the provision of good quality, flexible commercial space that has been designed to include units of varying scale, improved on street servicing for the commercial and residential space ;
- job creation;
- delivery of affordable workspace;
- Optimised use of the site.

86. The design of the commercial units and the flexibility they will offer is entirely consistent with the strategic and local policy objectives to provide workshops for small to medium sized enterprises, especially those in the cultural and creative industries.

87. Some limited weight can be attached to the NSP and OKR AAP at present, given that they have been subject of extensive consultation and the emerging policies would support the proposal. Given the changing character of the area, it is not felt that the introduction of housing would prejudice the operation of existing businesses in the area. In light of this officers consider that the principle of the proposed development in land use terms should be supported.

Environmental impact assessment

88. The applicant did not make a screening request to determine whether an Environmental Impact Assessment (EIA) is required in respect of the proposed development due to the size and scale of the proposed scheme. The proposed development would not constitute EIA development and accordingly does not need to

be supported by an Environmental Statement.

Affordable housing

89. Strategic Policy 6 of the Core Strategy 'Homes for People on Different Incomes' requires at least 35% of the residential units to be affordable. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms and further information on this can be found in the Council's draft Affordable Housing SPD (2011). All of the affordable units should be provided on site and a mix of housing types and sizes is required. In accordance with Saved Policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required.
90. Saved Policy 4.4 of the Southwark Plan requires a tenure split of 70% social rented to 30% intermediate housing. This is reiterated in the draft Old Kent Road Area Action Plan.
91. In total, 373 habitable rooms would be provided in the development. The development would provide a total of 136 affordable habitable rooms which would equate to an overall provision of 36.4%. The level of provision is therefore acceptable and policy compliant. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
92. With regard to tenure split, the proposed affordable housing offer equates to a total of 136 habitable rooms or 36.4% of the 373 habitable rooms proposed.
93. A standard policy compliant 35% habitable rooms offer would equate to 130.6 affordable habitable rooms, with 70% social rent at 91.4 habitable rooms, and 30% Intermediate at 39.2 habitable rooms.
94. The proposed 36.4% habitable rooms offer would exceed the split of a standard policy compliant 35% habitable rooms offer with 94 social rent habitable rooms and 42 Intermediate habitable rooms.
95. In light of this the proposed offer would exceed the 70/30 affordable tenure policy requirement for a 35% policy compliant scheme.

Table: Affordable housing

Units	Social rent	Intermediate (shared ownership)	Total
1 bed	10	6	16
2 bed	10	6	16
3 bed	11	3	14
Total	31	15	46

96. Overall, the proposal would provide a total of 46 affordable units in a mix of unit sizes within the southern building (Core A), which is a positive aspect of the scheme. A Section 106 agreement is recommended to secure the delivery of these units, including a clause preventing more than 50% of the private units from being occupied until the affordable units have been completed.

Design issues, including height, scale and massing

97. Strategic Policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to "achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in". Saved Policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments which includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
98. The emerging policy in the AAP sets out a vision for the Old Kent Road that would see substantial change in the area over the next twenty years, whilst seeking design that responds well to its existing character and sense of place. There are no conservation areas or listed buildings in the vicinity of the application site. The draft AAP does however identify buildings of townscape merit and architectural or historic interest around the site. None would be harmed by these proposals. Although proposal is considered a tall building, it is not considered that this proposal would result in any harm to designated London wide or local protected views, including the Protected Vista of 2A.1 of the London View Management Framework, which protects views from Parliament Hill Summit to St. Paul's Cathedral.

Height, Scale and Massing

99. The height of the buildings proposed marks a step change in the scale of development in the area, although not as tall as the towers on the adjacent Tustin Estate at circa 19 storeys, the height, scale and massing proposed is in line with the emerging policy set out in the draft AAP. At its highest point, the development under consideration here would be 51.575m high at the southern end of the site where the proposed building reaches 15 storeys. The building to the north reaches a height of 45.275m.
100. The form and massing approach is broadly supported by the GLA and the shallow footprint of the site allows potential for elegant building forms in views from the south and north of the site.
101. Policy 7.7 of the 2016 London Plan, 'Location and Design of Tall and Large Buildings', states that tall buildings should be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. Furthermore, London Plan Policy 2.13 requires development in Opportunity Areas to optimise residential and non residential output densities, meet or exceed minimum housing and employment guidelines and support wider regeneration objectives. Annexe 1 of the 2016 London Plan sets out the specific requirements for the Old Kent Road Opportunity Area, identifying it as having significant potential for residential- led redevelopment. As such, it is considered that the Old Kent Road Opportunity Area is, in principle, an acceptable location for tall buildings which optimise housing delivery and regeneration benefits.
102. This massing proposal would result in a well articulated composition, responds positively to the shape of the site, its existing context, and potential future development around the site, as illustrated in the master-planning of the draft OKR AAP which indicates a Tier 3 tall building on this site to a height of approximately 50m.

The two distinct residential blocks also help to break up the perception of massing along Ilderton Road and allows for the podium level amenity space to be well naturally lit from the east and west

103. The character of the area would not be adversely affected by the scale, mass or bulk of the tall buildings proposed because it is not generally considered sensitive to change of this type, and it is considered that the proposals would relate well to their surroundings, particularly at street level, with active frontages. The contribution that the scheme would make to local regeneration would be very significant in terms of mixed use development.
104. In terms of microclimate impacts, the results of the wind assessment for the proposed development indicate that no significant adverse effects are anticipated.
105. Public realm
106. The footways to Ilderton Road would be widened to create a comfortable setting for a building of this height, particularly where it is at its tallest, fronting onto Ilderton Road. A new piece of public open space of approximately 150sqm would be created adjacent to Wagner Street This piece of public realm would respond well to the activities planned for the ground floor of the proposed development. Its design would be secured by a landscaping condition.

Design Quality

107. The design proposed is of a high quality that responds well to the character of the surrounding context. The architectural language is primarily inspired by industrial buildings, resulting in an attractive, well proportioned building driven by the strong vertical columns and structural grid of the building. The windows would be a mix of aluminium windows, well in keeping with the aesthetic proposed. Windows of this nature are common in buildings around the application site. The rational, repetitive rhythm of the windows on each elevation, and the depth of the window reveals further contribute to the industrial aesthetic
108. Within this simple articulation, the building would have a clear, but subtly differentiated hierarchy of 'base', 'middle' and 'top', with different elevation details to separate the blocks into distinctive massings. This proposed articulation ensures comfortable proportions and a clear articulation of the mix of uses proposed.
109. The 'base' of the building, that includes the ground and first floors is defined by a continuous horizontal banding that splits the change in function from commercial use to residential uses above. The high floor to floor ceiling heights create a legible commercial frontage with opportunities for signage and activity along the length of the building. Regular rhythms of brick vertical columns meet the ground to create a colonnade with inset bays to Ilderton Road that enables wider footways and defensible space for the commercial units.
110. The 'middle' would feature a clear rhythm of windows and balconies, with predominant vertical bands of brickwork interlaced with horizontal and vertical bays of dark grey rain cladding and glass balconies inset into the brickwork.
111. The 'top' would be expressed with a mix of brick detailing and subservient pavilion

style additions clad in dark grey rain cladding.

Materials

112. A brick language is proposed for the building in response to the character of the surrounding area. This would consist predominantly of dark brown and light cream/white brick elevations to create a separation between the elements of the massing, interest with dark grey rainscreen cladding.
113. Dark grey aluminium window frame, dark grey aluminium curtain walling to commercial units and aluminium louvers matching the commercial units curtain walling are proposed for the commercial units. The detailed design of all windows will be secured by condition, as will the fit of the commercial units. The recessed and protruding balconies would be enclosed by glass balustrades
114. These materials, along with the details described above are considered an appropriate response to the existing character of the area and the emerging architectural language proposed in the draft OKR AAP. Detailed drawings and material samples will be required by condition in order to ensure that this quality of design is delivered.

Conclusion on design

115. The building would be of an appropriate height and scale and accordingly considered acceptable. The design quality, and use of brick would ensure that a high quality of finish would be achieved. Conditions are recommended in relation to detailed design and material samples.

Housing mix

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

Table 2: Unit mix

	Total number units (number)	Total Units (%)
Studios	0	0%
1 bed	44	34%
2 bed	59	45%
3 bed	27	21%
Total units	130	100%

117. 65% of units would have two or more bedrooms; this meets the 60% target and is therefore acceptable. 20% of the units would have three or more bedrooms, which is policy compliant. No studios are proposed. Thirteen wheelchair units (13%) would be provided, with a proportional distribution of wheelchair units between tenures and blocks (Core A and B). This is considered broadly acceptable.
118. In summary the housing mix would be in accordance the relevant policy.

Density

119. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet.
120. As the site is located within the Urban Zone, a density range of 200 to 700 habitable rooms per hectare would be sought. Appendix 2 of the saved Southwark Plan sets out guidance for how density should be calculated. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
121. The development as a whole would have a density of 2,157 habitable rooms per hectare. Since the maximum upper limit of 700hrh would be significantly exceeded, the development would need to demonstrate that it would be excellent in relation to housing quality. If it can be demonstrated that an excellent standard of accommodation would be provided, makes an exceptional contribution to the regeneration, and the response to context and impact on amenity to existing occupiers is acceptable, then it is considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission. This is considered in the following paragraphs.

Quality of accommodation

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

Aspect

123. 71% of the proposed 130 units would be dual aspect. Single aspect units would all be west facing across Ilderton Road and Tustin Estate. No north facing single aspect units are proposed. All of the three bed units would be a dual aspect.

Unit sizes

124. All of the proposed units would satisfy the minimum floor areas set out in Southwark's Residential Design Standards SPD, alongside good floor to ceiling heights and glazing. All kitchen units would be naturally ventilated and lit. Bathrooms and toilets would be artificially lit and ventilated, but this isn't uncommon in flatted developments. Accordingly, this aspect of the scheme is also policy compliant.

Internal daylight within the proposed residential units

125. A daylight and sunlight report and addendum based on the Building Research Establishment (BRE)

Daylight

126. Guidance has been submitted which considers daylight to the proposed dwellings using the Average Daylight Factor (ADF). ADF is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. This equates to the ratio of the average illuminance across the working plane, to the illuminance due to an unobstructed sky. ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.
127. The assessment of daylight to the main habitable spaces within the proposed accommodation showed that all the rooms tested achieve the recommended ADF value for their particular rooms use, the majority very comfortably. The analysis demonstrates that daylight amenity within the proposed residential accommodation will be very good and in full accordance with BRE guidance.

Overlooking

128. There would be some opportunities for overlooking between habitable windows of residential units within the scheme between the two buildings; however they would be separated by the landscaped podium amenity space which is 19m wide. This degree separation is considered to avoid any harmful overlooking.

Amenity and play space

129. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space (covering a range of age groups). The emerging OKR AAP requires 5sqm of public open space per dwelling as per AAP 10.
130. The following amount of amenity space would need to be provided:
 - For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD;
 - For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
 - 50sqm communal amenity space per block as required by the SPD;
 - 10sqm of children's play space for every child space in the development as required by the London Plan;
 - 5sqm of public open space per dwelling as required by the OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private amenity space

131. In this case, a total of 1300sqm of amenity space would need to be provided between the 130 units. In this instance 1092sqm of private amenity space is proposed, however

all flats have been provided with private amenity space in the form of balconies, which is a positive benefit of the scheme. The schedule of amenity space is:

- 35 units provide 10sqm or more of private amenity space, including all 3 bed units.
 - 41 units between 7 and 9sqm.
 - 51 units between 5 and 6sqm
132. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. The identified shortfall is 208sqm of private amenity space.

Communal amenity space

133. A total of 562sqm of communal amenity space is proposed in two roof level gardens which will be conditioned for detailed design. A total of 1350sqm of amenity space is required for the scheme which includes the 50sqm communal amenity space. The proposed private amenity space combined with the proposed communal amenity space would deliver a total amenity space of 1654sqm. This would exceed the total requirement plus the shortfall of 208sqm of private amenity space, and is therefore acceptable.

Children's amenity space

134. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG the development would be required to provide 429sqm of children's play space. An area of this play space has been provided as part of the communal area which goes part way to meet this requirement. However a shortfall of 304sqm is recognised, which would require a financial contribution of £45,904.00. This contribution will be secured by Section 106 agreement.
135. Further design details of the proposed play space within the scheme will be secured by condition.

Public open space

136. Policy AAP10 of the emerging OKR AAP requires the provision of 5sqm of public open space per dwelling which equates to 650sqm for the scheme. A 150sqm of public open space is proposed at the southern end of the site fronting Wagner Street. As such, there is a shortfall of 500sqm that cannot be provided on site which will be secured by a financial contribution.
137. Although this policy currently has limited weight, the applicant has agreed to make the contribution of £102,500 based on the 130 dwellings proposed (at a cost of £205 per sqm as set out in the section 106 SPD) which could go towards off site delivery of a new park to the north of the site, and can be secured by the legal agreement.

Noise

138. The site is located within the SPIL, and the proposed residential units would adjoin existing commercial units to the east, south and north, although these sites may come forward with similar mixed schemes. The railway line and associated arches is located

immediately to the east of the site. An environmental noise assessment has therefore been undertaken to assess whether the site would be suitable for residential development. The report has been reviewed by the Council's Environmental Protection Team (EPT) and a condition to secure appropriate internal noise levels is recommended, which should minimise the likelihood of noise complaints against the existing industrial occupiers. This should be capable of being achieved with robust glazing.

Conclusion on quality of accommodation

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

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

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

Daylight and Sunlight impact to existing residential units

141. A daylight and sunlight impact assessment was submitted with the planning application to assess the impact on nearby existing residential properties. The assessment utilised the following methodologies:

No-Sky Line (NSL)

142. NSL is a measure of the distribution of daylight within a room. It maps out the region within a room where light can penetrate directly from the sky, and therefore accounts for the size of and number of windows by simple geometry.
143. The BRE suggest that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. the proportional reduction in area should not be greater than 20%).

Vertical Sky Component (VSC)

144. VSC is a measure of the direct skylight reaching a point from an overcast sky. It is the ratio of the illuminance at a point on a given vertical plane to the illuminance at a point on a horizontal plane due to an unobstructed sky. For existing buildings, the BRE guideline is based on the loss of VSC at a point at the centre of a window, on the outer

plane of the wall. The BRE guidelines state that if the VSC at the centre of a window is less than 27%, and it is less than 0.8 times its former value (i.e. the proportional reduction is greater than 20%), then the reduction in skylight will be noticeable, and the existing building may be adversely affected.

145. Therefore, it is important to ensure the retained daylight levels are good and commensurate with the urban location. Inevitably this leads to retained daylight (VSC) levels that are less than 27% but are in line with those typical of central urban areas. The applicant considers a VSC target of 18% appropriate for this location.

Annual Probable Sunlight Hours (APSH)

146. In relation to sunlight, the BRE recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%). The BRE guidelines state that *'...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun'*. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room based figures.

147. The neighbouring residential units that have the potential to be impacted in terms of daylight and sunlight are located at:

- 7 to 21 Farrow Lane
- 23-53 Farrow Lane (odd)
- 899-915 Old Kent Road (odd)
- 881-887 Old Kent Road (odd)
- 28 Wagner Street
- 871 Old Kent Road
- 1 to 73 Windermere Point
- 1 to 72 Grasmere Point
- 1 to 72 Ambleside Point
- 1 to 20 Heversham House
- 21 to 84 Heversham House

148. The figure below illustrates the location of these existing residential properties:



Figure 3: Neighbouring residential properties

7 to 21 Farrow Lane

149. These flats are located to the east of the site across the railway way line in Lewisham.

Daylight

150. The majority of windows serving these properties comfortably achieve the BRE VSC criteria. Only two windows are not fully compliant with BRE guidance. These windows (W3/10 and W5/11) experience proportional reductions of 0.79 (21%) and 0.78 (22%) respectively. The retained VSC values are therefore very marginally less than 0.8 times the existing values, and therefore marginally below guidance. Both of the rooms that these windows serve are also served by another window that will experience negligible reductions. The overall effect on the rooms will therefore be very limited.

151. Considering NSL, all rooms achieve BRE guidance, with the majority not experiencing any reduction. The daylight reductions to these flats will not be material, and they will continue to receive very good amenity after development.

Sunlight

152. The impact on these flats is minimal, and fully complies with BRE Guidance. Sunlight amenity to the property will remain very good after the proposed scheme is implemented.

23-27 Farrow Lane (odd)

153. These properties are located to the east of the site across the railway way line in Lewisham.

154. It is assumed that the 2 ground floor windows to each of these properties both serve the same room, and that the 2 first floor windows serve two separate rooms. It

appears likely that the smaller first floor windows serve bathrooms, and although figures were presented for these, if this is indeed the case then they would in fact not be material for assessment.

Daylight

155. Considering NSL, while the first floor rooms experience larger reductions, proportional reductions to all the ground floor rooms in these properties fully accord with BRE guidance. While proportional reductions in VSC are between and 0.8 (20%) and 0.74 (26%), i.e. marginally in excess of BRE guidance, retained values remain very good, particularly so for an urban location. All windows will retain VSC values in excess of 23%, with the majority retaining values of over 25%. The overall reduction in daylight amenity to these properties is very limited

Sunlight

156. As none of the potentially impacted windows are orientated within 90 degrees of south, sunlight is not an issue.

29-53 Farrow Lane (odd)

157. These properties are located to the east of the site across the railway way line in Lewisham. It is assumed that the 2 ground floor windows to each of these properties both serve the same room, and that the 2 first floor windows serve two separate rooms. It seems likely that the smaller first floor windows appear to serve bathrooms, and although figures were presented for these rooms, if this is indeed the case then they would in fact not be material for assessment.

Daylight

158. Considering NSL, while the first floor rooms experience larger reductions, proportional reductions to all the ground floor rooms in these properties fully accord with BRE guidance. Proportional reductions in VSC to the windows serving these properties are in the region of 0.74 to 0.64. While these reductions are in excess of default BRE guidance, and consequently may be noticeable to the occupants, retained VSC values remain good. With the exception of window W4/40 which retains a VSC of 17.89%, all windows will retain a VSC in excess of 18% after development, with over 80% retaining a value in excess of 21%.
159. Daylight amenity to all these properties will therefore remain good after development, and the impacts should be regarded as acceptable, particularly in the context of the urban location.

Sunlight

160. As none of the potentially impacted windows are orientated within 90 degrees of south, sunlight is not an issue.

899-915 Old Kent Road (odd)

161. These properties are located to the south east of the site, across the railway line and Wagner Street. While there are retail units at ground floor, from site inspection there

appears to be residential accommodation above.

Daylight

162. Reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore not be a material reduction in daylight to these properties, and each will continue to retain good amenity after development.

Sunlight

163. As the Application Site is located to the north of these properties, sunlight is not an issue.

881-887 Old Kent Road (odd)

164. These properties are located to the south of the site, behind 28 and 30 Wagner Street. While there are retail units at ground floor, from site inspection there appears to be residential accommodation above.

Daylight

165. Reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore not be a material reduction in daylight to these properties, and each will continue to retain good amenity after development.

Sunlight

166. As the Application Site is located to the north of these properties, sunlight is not an issue

28 Wagner Street

167. This property is located to the south of the site across Wagner Street.

Daylight

168. Considering NSL, 3 of the 4 potentially impacted rooms in this property will experience reductions that are very marginally in excess of BRE guidance. One first floor room will experience a slightly larger reduction. Proportional reductions in VSC to the windows serving these properties are in the region of 0.59 to 0.56. While these reductions are in excess of default BRE guidance, and consequently may be noticeable to the occupants, retained VSC values remain good. All windows will retain a VSC between 18.6% and 21.9% after development.
169. Daylight amenity to the property will therefore remain good after development the impact is considered acceptable, particularly in the context of the urban location.
170. It should be noted that this property will also receive improved amenity in terms of outlook, as it would front the new public open space on the northern side of Wagner Street.

Sunlight

171. As the Application Site is located to the north of this property, sunlight is not an issue.

871 Old Kent Road

172. This property is a bar and restaurant at ground floor level, with a flat at first floor level. It appears that there is one main habitable room, served by 2 windows, that could potentially be impacted by the proposal.

Daylight

173. While the proportional reduction in VSC to window W7/321 is marginally in excess of guidance, the reduction to the main window serving the space, W6/321, is well within guidance. Retained VSC values to these windows are 25.19% and 30.87% respectively. This is an extremely good level of daylight irrespective of location.
174. Considering NSL, there will be no reduction. There will therefore not be a material reduction in daylight to this property and it will continue to retain excellent amenity after development.

Sunlight

175. As the Application Site is located to the north of this property, sunlight is not an issue.

1 to 73 Windermere Point

176. These flats are located to the west of the Application Site across Ilderton Road and form part of the Tustin Estate.

Daylight

177. The proportional reductions in VSC to the vast majority of windows serving these flats fully accord with BRE guidance. There are 10 windows that will experience slightly larger reductions. 7 of these are small, secondary windows to the rooms they serve, with the primary windows very comfortably achieving guidance. The overall effect on the daylight amenity to these rooms is therefore very limited.
178. The remaining 3 windows (W6/351, W9/352 and W9/353) are located under balconies that restrict their accesses to direct skylight. In situations such as this the BRE suggest that another calculation is carried out with the obstruction overhead removed. If the proportional reduction is in excess of guidance with the balcony in place, but achieves guidance with it removed, this demonstrates that it is the presence of the balcony, rather than the size of the new obstruction, that is the main factor in the relative loss of light.
179. Considering the figures, with the balconies in place the proportional reductions are marginally in excess of guidance. With the balcony effect removed the proportional reductions are well within guidance. The reductions here are therefore in full accordance with BRE guidance.

180. Considering NSL, none of the rooms experience any reduction.
181. Overall, the reductions in daylight to these flats are small, and they will all continue to receive very good daylight amenity after development.

Sunlight

182. Reductions in APSH to these flats fully accord with BRE guidance. The properties will continue to receive very good sunlight amenity after development.

1 to 72 Grasmere Point

183. These flats are located to the west of the Application Site across Ilderton Road and form part of the Tustin Estate.

Daylight

184. Reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore be a very limited reduction in daylight to these properties, and each will continue to retain good amenity after development.

Sunlight

185. Reductions in APSH to these flats fully accord with BRE guidance. The properties will continue to receive very good sunlight amenity after development.

1 to 72 Ambleside Point

186. These flats are located to the west of the Application Site across Ilderton Road and form part of the Tustin Estate.

Daylight

187. Reductions in daylight to all the windows and rooms in these properties fully accord with the BRE VSC and NSL criteria respectively. There will therefore not be a material reduction in daylight to these properties, and each will continue to retain good amenity after development.

Sunlight

188. The reductions in APSH to the vast majority of rooms within these flats fully accord with BRE guidance. While there are 5 rooms that are below guidance, in each case this is due to a small reduction in winter sunlight. This is not unusual in an urban location, for example, in midwinter the sun's maximum elevation is around 15 degrees above the horizon, and this is lower than a typical urban skyline. In each case the room will still receive over the recommended 25% of total APSH after development. The reductions in sunlight amenity to these flats are limited, and they will continue to receive very good levels of sunlight after development.

1 to 20 Heversham House

189. These flats are located to the west of the Application Site across Ilderton Road.

Daylight

190. Reductions to the 5 south facing windows assessed (W5/441, W5/442, W5/443, W5/444 and W5/445) are small and in full accordance within BRE guidance. Each will retain a VSC in excess of the default BRE target of 27% after development.

191. The remaining windows are all located under external walkways that restrict their access to direct skylight. In situations such as this the BRE suggest that another calculation is carried out with the overhead obstruction removed. If the proportional reduction is in excess of guidance with the overhead obstruction in place, but achieves guidance with it removed, this demonstrates that it is the presence of the balcony, rather than the size of the new obstruction, that is the main factor in the relative loss of light. Considering the VSC figures with the walkway effect removed, reductions to all windows at 2nd floor level and above accord with guidance. The proportional reduction to the 1st floor windows are marginally in excess of guidance. The retained VSC values with the walkway effect removed (i.e. the level of daylight reaching the façade of the building) are all in excess of 22%. This is a good level of daylight, particularly so for an urban location. Overall the impact on daylight is limited.

192. Considering NSL, none of the rooms will experience any reduction.

193. Overall reductions in daylight amenity to this property are small and accord with BRE guidance.

Sunlight

194. The reductions in APSH to all windows are small and in full accordance with guidance.

21 to 84 Heversham House

195. These flats are located to the west of the Application Site across Ilderton Road.

Daylight

196. Considering NSL, reductions to over 75% of the potentially impacted rooms are within BRE guidance. Proportional reductions to the remaining rooms are in the region of 0.79 to 0.62 (21% to 38%). While these reductions are in excess of default BRE guidance, and consequently may be noticeable to the occupants, retained VSC values remain good.

197. Considering VSC, many of the windows are recessed into the building and have their access to direct skylight restricted by walkways and overhanging massing above. Removing the effect of these walkways and overhangs in line with BRE guidance, reductions to over half of the windows fully accord with the guidelines. Proportional reductions to the remaining windows are in the region of 0.69 to 0.58 (31% to 42%) Considering the retained VSC values with the walkway and overhang effect removed (i.e. the level of daylight reaching the façade of the building) are all in excess of 21%. This is a good level of daylight, particularly so for an urban location.

198. Daylight amenity to all these flats will therefore remain good after development, and

the impacts should be regarded as acceptable, particularly in the context of the urban location.

Sunlight

199. While the recessed windows will receive lower levels of sunlight, all the windows in the outer facade will continue to receive over double the recommended levels of sunlight (25% of total APSH, with at least 5% in winter) after development. Overall sunlight amenity to these properties will therefore remain very good after development.

Conclusion on daylight and sunlight impacts to existing residential units

200. A detailed daylight sunlight assessment has been undertaken in relation to all neighbouring residential properties in accordance with the BRE guidelines on daylight and sunlight.
201. It should be noted that the existing site massing is modest, and therefore some noticeable proportional reductions will be inevitable with any scheme that optimises the full potential of the site. However, as has been held on Appeal, noticeable is not to be equated with unacceptable.
202. While reductions in amenity to many of the properties assessed fully comply with the default BRE criteria, there will be noticeable impacts to some properties as set out above. However, in each case these are limited and considered to be reasonable in this context. The limited impact is regarded as acceptable.

Daylight and Sunlight impact to emerging residential units

203. In terms of emerging schemes, a mixed use scheme on the eastern side of the railway viaduct at 1 White Post Street within Lewisham has been submitted to Lewisham Council for determination. Application Reference – DC/17/104772. The description for this development is:

The demolition of the existing structures at 1 White Post Street SE15 and redevelopment to provide a mixed use development comprising the construction of two buildings ranging from 3-7 storeys and refurbishment of the 6 railway arches (No's 62 - 67), providing 975 sqm of flexible commercial floorspace (A1/A2/B1/D1) and 25 residential units; together with the provision of associated plant, amenity space, 2 accessible car parking spaces and 56 cycle spaces.

204. This planning application has yet to be determined by Lewisham Council.
205. An objection was received from the applicant for the 1 White Post Street scheme regarding the potential daylight and sunlight impacts to the proposed residential units. As such, an addendum was prepared to assess the retained levels of daylight within both proposed developments assuming that both are implemented.

The assessment showed that all the rooms assessed will achieve the ADF target values for their principal room use, the majority very comfortably. Daylight amenity within both proposed developments will therefore remain very good after both are implemented.

Overlooking

206. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. These distances are all met in terms of the impact of the proposal on adjacent buildings.
207. In relation to adjoining sites the proposed scheme is approximately 25 metres away from 1-20 Heversham House and approximately a minimum of 35 metres away from 21-98 Heversham House on the Tustin Estate, approximately 25 metres away from the emerging mixed use scheme at 1 White Post Street and approximately 15 metres from the properties at 28-30 Wagner Street. These degrees of separation when considered with the orientation of the flats are considered to avoid any harmful overlooking.

208. Outlook

209. It is considered that the proposed development will provide an improved outlook for nearby residential properties as the scheme would place a site that does not enhance the street townscape and is partly in a poor condition. New public realm and wider footways would enhance the existing poor quality of public realm. While the boundary wall and fences would be replaced with active frontages that encourage, increased footfall and use of the site.

Air quality

210. The site is located in an Air Quality Management Area and an Air Quality Assessment has been submitted, which considers the air quality impacts arising from the construction and use of the development.
211. The Council's Environmental Protection Team (EPT) has reviewed the submission and advised that they will require the emissions during the construction phase to be controlled by measures contained within a Construction Management Plan. Such a plan should include details of continuous monitoring for dust and noise. It is recommended that this plan be requested by condition.
212. The proposed development will meet building and transport emission benchmarks in terms of air quality neutrality. As such, no mitigation measures are required to reduce these emissions.

Transport issues

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

Accessibility

214. The site has a PTAL (public transport accessibility level) of 4 (moderate) and is not located in a controlled parking zone (CPZ). It is within 75m from the junction of the Old Kent Road and Ilderton Road. There are two bus stops within the vicinity of the site. The Old Kent Road is less than 100 m from the site providing access to further bus services.
215. The proposal includes convenient pedestrian access points around the whole development. The building has been set back to allow the existing footway along the western boundary of the site to be widened as a part of the development proposals and this will benefit the pedestrian permeability throughout the local area.

Servicing

216. The site currently has five vehicular accesses on Ilderton Road and one at the south of the site on Wagner Street. The proposal is to return 4 crossovers to footway and have a single vehicle access off Ilderton Road at the northwest corner which leads to 3 disabled car parking spaces. Two loading bays on Ilderton Road are proposed that are close to the entrances to the residential and commercial entrances. Public highway improvements to be agreed and implemented within an S278 works.
217. Considering the site constraints, the applicant in negotiations with officers, has considered how to best service the proposed residential and commercial land uses on the site. The proposed servicing arrangements are considered to be effective for the proposed residential and commercial land uses on the site, especially the B1 land uses in terms of proximity of loading bays to entrances and internal goods lifts between ground and first floor commercial units.
218. Sufficient information has been provided to demonstrate the development is unlikely to have an effect on the local highway network compared to that of the existing industrial use. The trip generation of the proposed development has been estimated with reference to data from the TRICS database for the residential and commercial land uses assessed using 'worst case' scenario. The proposed development should result in a reduction of two-way vehicle trips per day from 184 to 42 which are in excess of 70%. Also the existing trips are related to 14 tonne plus vehicles due to the nature of the businesses. A reduction in individual large vehicles is generally positive for the area, however there will still be commercial trips that are required to service the commercial uses. All public transport trips combine a pedestrian element. So actual pedestrian trips to and from site will be in excess of 89% of trips.
219. It was noted during site visits by officers that the existing uses on site currently have a poor servicing arrangement in terms of the access to and from the highway with vehicles using the highway for loading and unloading.
220. The detailed design of these servicing facilities would be secured by condition and legal agreement.



Figure 4: Ground floor plan of proposed scheme

221. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm non-residential floorspace. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:

- (i) necessary to make the development acceptable in planning terms;
- (ii) directly related to the development; and
- (iii) fairly and reasonably related in scale and kind to the development.

222. The bond with the council against its own baseline of daily trips for the servicing and delivery of the development. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring.

223. The bond is currently estimated to be:

Residential (£100 per unit)	130	£13,000
Non-residential floorspace (£100 per 500m ²)	1,661sqm	£300

Total		£13,300.00
Daily servicing/delivery vehicles baseline	Tba	

224. Servicing and Deliveries for the development can include:

- Postal deliveries;
- On-line grocery deliveries to residential units;
- Amazon/argos type deliveries
- Fast food home deliveries
- Private hire vehicle pick ups and drop offs
- Weekly refuse collection by LBS;
- Weekly recycling collection by LBS;
- Courier deliveries / collections; and
- Facilities Management

Car parking

225. Proposal is car free with the exception of on-site provision for three disabled bays and one servicing bay this is appropriate at this location reflecting average car ownership levels in the area also there are three car club bays within a 10-minute walk of the development. Parking surveys were carried out on Tuesday 27th and Wednesday 28th June 2017 to determine the level of on-street car parking capacity within the local area. A consistent parking stress of 88% or 57 parked vehicles was observed on both nights, with 65 unrestricted parking spaces available and 13 spaces available on single yellow lines, and therefore shows this is operating with spare capacity.
226. All new residents will be permit free for a future CPZ, while 3 year car club membership for new residents is offered. Ilderton Road is currently uncontrolled however this is being reviewed and changes may be made related to the S278 works.

Cycle parking

227. The scheme proposes dedicated residential storage for 224 bicycles and 25 commercial spaces in line with London Plan and London Cycle Design Standards for both residential and commercial elements. To ensure delivery, a condition for detailed design is required. Residential and commercial cycle parking is accessed via the respective cores or direct from Ilderton Road.
228. The applicant has agreed to provide three years membership to all eligible residents to dockless cycle hire schemes which can be secured by the S106 legal agreement. A scheme of 'Brompton' lockers for 10% of residential units with at least 2 of which have EV charging is considered an acceptable alternative to the dockless cycle hire, and would be secure by Section 106 legal agreement. This would also provide access to cycling without needing to own a bicycle.

Construction management

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

Impact on trees

230. Saved policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
231. Two new trees would be planted which represents a net gain in tree cover which is welcomed and supported. The existing pavement would be widened to accommodate further new tree planting which can be secured by a S.278 Highways agreement.

Planning obligations (S.106 undertaking or agreement)

232. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
233. The application would be supported by the following s106 obligations:

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171	Agreed
Affordable housing monitoring	£6,095 (for 46 units)	Agreed
Carbon Offset – Green Fund	£244,543.75 (Consisting of £242,127 for residential and £2,416.75 for non-residential)	Agreed
Delivery and service bond	£13,300	Agreed
Public open space	£102,500	Agreed
Loss of employment space	£1848.09 for 202sqm for B1(c) land use	Agreed
Transport for London Buses	Amount to be agreed	To be agreed
Transport for London Legible signage	£6,000	Funded through CIL
Transport for London Healthy Streets	£130,000	Funded through CIL
Child play space shortfall	£45,904.00	Agreed
Admin fee	2%	Agreed
Total	£561,362	

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

- Affordable housing provisions
- Wheelchair housing provisions
- Appointment of workspace co-ordinator
- Affordable workspace – 10% of floorspace
- Terms for the affordable workspace – £12 per sq ft, over a 15 year period
- Retention of existing occupiers business plan
- Loss of employment floorspace
- Construction phase jobs
- Highway works – s278 for parking bays, highway works including disabled and loading bay provision and tree planting
- Dockless cycle hire for 3 years or Brompton lockers (10% of units)
- Car club membership for 3 years
- Parking permits exclusion zone for future occupants
- Connection to a future district heating system
- Disabled parking restrictions

235. In the event that an agreement has not been completed by 27 April 2019, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

In the absence of a signed S106 legal agreement there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Saved Policy 2.5 Planning Obligations of the Southwark Plan 2007, Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011) Policy 8.2 Planning Obligations of the London Plan (2015) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and Southwark Community Infrastructure Levy (CIL)

236. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material “local financial consideration” in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark’s CIL will provide for infrastructure that supports growth in Southwark.

237. In this instance an approximate Mayoral CIL payment of £638,976.17 and an approximate Southwark CIL payment of £2,776,663.85 would be required. These are pre-social housing relief figures and accordingly would be reduced when the CIL Social Housing Relief claim is submitted after the grant of planning permission.

Sustainable development implications

238. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the

Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 35% reduction against part L of the Building Regulations (2013). An Energy statement and Sustainability Assessment based on the Mayor's hierarchy have been submitted.

Be lean (use less energy)

239. Energy efficient measures included in the strategy are passive design measures, high efficiency glazing and energy efficient lighting and a reduced air permeability rate.

Be clean (supply energy efficiently)

240. A communal gas boiler would be provided to reduce the carbon dioxide savings further.
241. The building would be future-proofed for connection to a future district heating system which would be secured through the S106 agreement.

Be green (low or carbon zero energy)

242. A range of low or zero carbon technologies was considered and photo voltaic panels (PVs) were found to be most suitable for this scheme. The PVs proposed would reduce carbon emissions by 6%; this would not meet the 20% target for Strategic Policy 13 of the Core Strategy. It is noted that the development is constrained by its massing in what can be achieved. The roof area to overall floor area ratio is very low as the buildings are narrow and tall. This significantly restricts the amount of PVs that can be installed on the roofs and reduces the overall carbon savings that can be achieved.
243. Overall, the 'be lean', 'be clean' and 'be green' measures would result in an overall reduction in carbon dioxide emissions when compared to a scheme compliant with the building regulations.
244. For the residential element, a 12% carbon reduction would be achieved falling short of the zero carbon requirements as set out in policy 5.2 of the London Plan, amounting to a 134.51 tonne shortfall.
245. For the commercial element, a 30.81% reduction in carbon emissions would be achieved, falling short of the 35% target against Part L of the Building Regulations (2013), amounting to a 1.12 tonne shortfall.
246. Recognising that both the residential and commercial aspects fall below the policy requirements in relation to carbon savings, a contribution towards the council's carbon offset fund would be required. Calculated on the basis of £1,800 per tonne, the residential component would generate a contribution of £212,127 and the commercial component a contribution of £2416.75 at £60 per tonne. The applicant has agreed to make the contribution of £244,543.75 to the carbon off set fund which would therefore make this aspect of the scheme fully policy compliant.

BREEAM

247. Strategic policy 13 of the Core Strategy requires the commercial units to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken which demonstrates that a "Very Good" standard can be achieved. This does not meet the required "Excellent" standard that is required for the commercial element. A pre-fit condition for the commercial workspace to secure an 'Excellent' standard is therefore recommended. A proposed B1(c) fit out condition will assist this improvement.

Ecology

248. The applicant has submitted a Preliminary Ecological Appraisal and Building Inspection for Bats which has been reviewed by the council's Ecologist. The assessment indicates that there would be no adverse impact to bats. Green roof are proposed on which would provide some biodiversity and sustainability benefits and accordingly is welcomed, subject to condition. A condition is also proposed for the installation of 3 x nest boxes for house sparrows in the brick work on the East elevation of Core B and the South elevation of Core A. This requirement would also be secured by condition
249. The appraisal noted that Japanese Knotweed is present in two locations on the site. As such a control of invasive species condition is suggested for the removal or long-term management /eradication of the Japanese Knotweed, as the spread of which is prohibited under the Wildlife and Countryside Act 1981.

Other matters

Flood risk and water resources

250. The application site is located within Flood Zone 3, which is considered to be 'High Risk' but does benefit from the Thames tidal defences. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable subject to the attachment of conditions being attached to any grant of planning permission.
251. The council's Flood Risk Management Team support the inclusion of green roofs and further storage to meet a site discharge rate of 5 l/s for 1 year and 100 year return period critical storms plus a climate change allowance of 40%. They have requested two conditions requiring a Flood Warning and Evacuation Plan and a Basement Impact Assessment is required:

Archaeology

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

Conclusion on planning issues

254. The proposed development would result in the delivery of substantial amount of B class floorspace, although the introduction of residential uses in to the SPIL would represent a departure from the adopted development plan. The draft New Southwark Plan and Old Kent Road Area Action Plan do, however, provide an indication of the direction of travel for planning policy in the area specifically involving the site to be released from its SPIL designation and the expectation of mixed use neighbourhoods and significant levels of new housing. The proposed development would increase the numbers of jobs on the site and deliver new housing, including a policy compliant level of affordable housing in terms of habitable rooms. Affordable workspace has been proposed and there are further benefits in terms of business retention which can be secured by the legal agreement. Recognising the changing character and uses carried out in the immediate area, it is not felt that any harm to existing businesses would arise by the introduction of housing. In light of this it is considered that the principle of the proposed development should be supported in this instance.
255. The proposal would deliver a good standard of accommodation and would address the majority of standards as set out in the residential design standards adopted by the council in relation to unit mix, unit size, dual aspect and wheelchair housing. The provision of affordable housing, measured at 36.4% of habitable rooms would be policy compliant and is a positive aspect of the proposals.
256. A detailed daylight and sunlight assessment has been undertaken in relation to all neighbouring residential properties in accordance with the BRE guidelines on daylight and sunlight. As the existing site massing is modest, there would be some noticeable proportional reductions to daylight and sunlight that as a consequence of the scheme optimising the full potential of the site. While reductions in amenity to many of the properties assessed fully comply with the default BRE criteria, there will be impacts to some properties. However, in each case these are considered to be limited and to not unacceptably harm the amenity of neighbouring residents and are therefore considered acceptable.
257. The scheme would have significant townscape benefits and improve outlook for neighbouring properties in terms of new public realm, natural surveillance and commercial activity.
258. The height and massing of the proposed buildings and podium would optimise the use of the site, respond successfully to the existing character and surrounding context, and the architectural language, inspired by nearby buildings and the design guidance in the draft Area Action Plan would result in an attractive building.
259. It is therefore recommended that planning permission be granted subject to conditions and the completion of a legal agreement under the terms as set out above, and referral to the Mayor of London and Secretary of State.

Community impact statement

260. Details of consultation undertaken by the applicant on the proposed development prior to submission of the planning application have been provided. Leaflets were sent to local businesses detailing the proposals with contact details and an offer to meet with

residents and businesses to discuss the scheme. Information was supplied as a result of two requests. The applicant also met with Network Rail to discuss the scheme and extent of land ownership.

261. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act:

a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connect to that characteristic;
- Take steps to meets the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

262. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

263. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.

264. The Council has given due regard to the above needs and rights where relevant throughout the course of determining this application and consider that the proposals would not give rise to any equalities issues.

Consultations

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

Consultation replies

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

Summary of consultation responses

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

268. Objection: Keep as the commercial property and jobs will be lost.
Officer response: Employment floorspace will be reprovided on site with an increase in job creation.

269. Objection: No need for more housing as development has already been granted.
Officer response: There is still significant housing need within Southwark.
270. Objection: Concerns that the application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.
Officer response: This matter is thoroughly assessed within the body of this report.
271. Objection: Officers need to be confident that the development does not prejudicially inhibit other developments coming forward at a similar scale. TVIA and DAS insufficient in relation to cumulative impacts.
Officer response: Officers are confident that the development does not prejudicially inhibit other developments coming forward at a similar scale following the plan led approach set out in the draft Old Kent Road AAP. The submitted documents are considered appropriate.
272. Objection: This Application does not consider the impact on the ability of the adjacent site at 1 White Post to be brought forward for regeneration.
Officer response: This has been addressed above in relation to daylight and sunlight impacts in the body of this report.
273. Objection: Proposed building will block views for existing residents.
Officer response: The proposal will change the skyline within the area, however the proposal is considered acceptable in terms of impact on outlook and townscape and does not impact any protected views.
274. Objection: Existing properties will be overshadowed and overlooked by the proposed building
Officer response: The proposal will have some impact in terms of overshadowing to existing neighbours, however the level of overshadowing is considered not harmful to warrant refusal of the application. In terms of overlooking, the proposed scheme and properties are separated to an acceptable level commensurate to an urban context.
275. Objection: The proposal would restrict and block light to existing properties.
Officer response: The daylight and sunlight impacts have been assessed and are considered acceptable for this context.
276. Objection: The process of the development will cause a lot of disruption, noise, dust, fumes and smell.
Officer response: A construction management plan will be secured by condition to mitigate the impact of development.

Summary of responses from external and statutory consultees

GLA

277. The GLA's Stage 1 response considers that the application does not comply with the London Plan and draft new London Plan. The reasons for this, along with Officer responses, are set out below.
278. The provision of residential units on this protected industrial site in the Old Kent

Road Opportunity Area is not currently supported, in line with London Plan Policies 2.17 and 4.4 and draft London Plan Policy E6. The balance of uses proposed does not accord with London Plan Policy 4.4 and Policy E7 of the draft London Plan; and should the site be considered suitable for mixed-use development the applicant must provide genuine industrial floorspace to address the requirements of draft London Plan Policy E7.

279. Officer Response: The GLA and LBS have now agreed an approach to phasing the release of protected industrial land for mixed use development in the Old Kent Road Opportunity Area. The application site is agreed to be in the first phase of released sites. A letter was received from the Deputy Mayor for Planning, Regeneration and Skills, dated 17th September 2018 which confirms the “agreed means for Southwark, the GLA and TfL to deliver the scale of change and quality we want to see for Old Kent Road. This agreement is very welcome, and I believe places us in the best position to continue to make the case for BLE funding to government.” The letter goes on to identify detailed matters that still need to be addressed, but the Deputy Mayor states that he is “confident these final matters can be fully resolved over the coming months”. Members should however note that even with this agreement in place the draft OKR AAP and New Southwark Plan (NSP) would still need to be subject to an EiP and approval of the Secretary of State before they become the adopted development plan position. It should also be noted that there have been a number of objections to the proposed release of industrial land from third parties which would need to be considered at the EiP.
280. Following extensive revisions to the design of the proposal in light of site constraints that include the narrow shape of the site, it is considered that a B1 use class with a conditioned B1(c) fit out is the most appropriate use class that will deliver increased delivery of jobs within the area.
281. The proposed affordable housing offer at 35% by habitable room, does not meet the GLA’s 50% threshold for the Fast Track Route for applications on industrial land; therefore, a financial viability assessment must be provided. Early and late stage review mechanisms must be secured in accordance with Policy H6 of the draft London Plan and the Mayor’s SPG; and the affordability of the units must accord with the requirements of Policy H7 of the draft London Plan, the Mayor’s Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report.
282. Officer Response: The proposed offer of 36% affordable housing by habitable rooms is considered policy compliant in relation to the Affordable Housing SPD (2008 - Adopted and 2011 - Draft). London Borough of Southwark requires full viability assessment in line with its adopted Development Viability SPD (2016). This has been submitted and reviewed independently on behalf of the council by BPS. BPS have concluded that the scheme is providing the maximum level of affordable housing. GLA have also reviewed the viability report and reached the same conclusion.
283. The carbon emission figures (for the entire site) in tonnes per annum for each stage of the energy hierarchy for the domestic and non-domestic elements must be provided separately. Clarifications relating to the central plant room, site heat network, district heat network, photo voltaic roof layout, Air Source Heat Pump and TER/DER and BRUKL sheets are also requested.
284. Officer Response: The applicant is confirming the commercial carbon emission

figures.

285. The GLA requested a Servicing and Delivery Plan.

Officer Response: This would be secured by condition.

286. Concerns over the two loading bays and impact on the footway and residential entrances and provision of car parking in public realm

287. Officer Response: This scheme has been amended to improve bay locations and footway widths. The public realm has also been amended to move the proposed car parking.

288. In terms of residential quality, the footprint and orientation of the block creates good quality residential accommodation, with predominantly east/west aspects, efficient core to unit ratios and a reasonable proportion of dual aspect. The podium level shared amenity space between the two residential blocks is generous in proportions. Building heights supported.

289. Officer Response: The scheme has been further revised to improve residential quality including access to private and affordable units combined in Core A, an improved ratio of 1 and 2 bedroom flats with improved double aspect views and improved play space.

290. The development should be car free in line with the draft London Plan and emerging OKR AAP; therefore, the four car parking spaces proposed should be omitted. A total of four Blue Badge car parking spaces are proposed; this meets the initial provision required under draft London Plan Policy T6.1. However, further information must be provided indicating how this provision could be expanded to 10% as required by this policy. Funding for a controlled parking zone should be secured, and this development should be made "permit-free" except for Blue Badge holders. Active and passive electric vehicle charging points must also be secured.

291. Officer Response: Relevant conditions and S106 agreement proposed. It is not considered feasible to provide further parking on site in light of the requirement to reprovide commercial floorspace and the restricted shape of the site.

292. Cycle parking is below minimum standards and of poor quality and therefore must be improved. A contribution to the London Cycle Hire Scheme will also be required.

293. Officer Response: Cycle parking design will be secured by condition. Further amendments to the internal layout have been secured.

Metropolitan Police

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

London Underground

295. No comment.

Thames Water

296. No objection, informative suggested.

Environment Agency

297. No objection subject to conditions.

Natural England

298. No comment.

Historic England

299. No comment.

Transport for London

300. Concerns raised regarding the pedestrian environment fronting Ilderton Road and the introduction of the bus layby.

301. Officer Response: The council agrees that the bus stops on Ilderton Road will need to be reviewed in light of the regeneration in the area. The relocation of the bus stop, if a change is required post review, will be agreed through the S278 and with TfL.

302. The proposed visitor cycle parking is situated in locations set back from the road and partially hidden (to the north by a car parking space, to the south by building columns). These should be relocated to make them more prominent and increase the level of natural surveillance, thereby reducing the risk of theft or tampering.

303. Officer Response: Detailed cycle parking and landscaping will be subject to condition

304. A financial contribution of £26,000 (£200 per unit) for cycle hire was requested.

305. Officer Response: Officers have worked with the developer on this and have recommended either Dockless cycle hire for 3 years or Brompton lockers (10% of units) to provide a convenient in house cycle hire facility with at least two lockers providing EV charging. This will allow residents and workers of the site to access convenient cycle hire using a quality model of bike that can be flexible in use.

306. The following financial contributions for highways infrastructure was requested:

- Healthy Streets = £130,000
- Legible London = £6,000

307. Officer response: Infrastructure requirements are covered under CIL. We are working with TfL on a surface transport delivery plan with estimates and priorities. Developers are also making contributions to public realm improvements and will be delivering improvements in the vicinity of the development within their S278 agreement.

308. Detailed Construction Traffic Management Plan (CTMP) and Delivery and Servicing Management Plans are required by condition

309. Officer response: Agreed.

310. Car-free development supported. Room for disabled parking expansion.
311. Officer response: Due to site constraints and other policy requirements this is not possible. However council will condition that the disabled bays will not be able to be reallocated to private households.
312. It would be appropriate for all accessible parking spaces to have an EVCP given the difficulty inherent in allocating spaces.
313. Officer response: Noted. A condition is proposed to secure this.
314. A financial contribution of £416,250 has been requested for improvements to bus services.
315. Officer response: Officers agree with TfL that an increased and improved bus services are needed to accommodate growth in the Old Kent Road Opportunity Area prior to the arrival of the Bakerloo Line Extension (BLE). LBS Officers are working with TfL to produce a phasing plan which will ensure this happens. It will require contributions from developers to pay for additional bus services. The LBS Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015) is clear and transparent in what it expects development to deliver for local people and these contributions need to be subject to the same rigour. In addition, as the collecting and enforcing authority for the Section 106 Agreement, LBS need to know that the contributions requested pass the Section 106 tests and are fair and proportionate and reasonably related to mitigating the impacts of each individual scheme. If this is not confirmed according to a clear evidence base setting out exactly what is required and what can be accommodated, any contributions may be subject to challenge. LBS officers are therefore working with TfL to set out a strategy that is deliverable and coherent and can be seen by local people and developers alike to addressing concerns about bus capacity.

Network Rail

316. No objection subject to Network Rail construction requirements

Human rights implications

317. 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.
318. This application has the legitimate aim of providing a new building with employment and residential uses. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

REASONS FOR LATENESS

319. This planning application was due to be considered at the Planning Committee meeting held on 27 November 2018 but was deferred by the Committee to the meeting scheduled for 4 December. The agenda for the 4 December was despatched the day before the meeting of the 27 November.

REASONS FOR URGENCY

320. In order to consider the application in a timely manner to promote development that has the potential to provide new homes, including affordable homes, and jobs and deliver the regeneration objectives of the Old Kent Road Area Action Plan. Deferring to a later committee will require rescheduling of other planning decisions which would also prevent decisions being taken in a timely manner and delay delivery of homes, affordable homes, jobs and other benefits of development.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/ 2327-349 Application file: 17/AP/4819 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5513 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Tom Buttrick, Team Leader	
Version	Final	
Dated	29 November 2018	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES /CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director, 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		29 November 2018

APPENDIX 1

Consultation undertaken

Site notice date: 29/01/2018

Press notice date: 01/02/2018

Case officer site visit date: n/a

Neighbour consultation letters sent: 30/01/2018

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

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

Neighbour and local groups consulted:

66 Windermere Point Old Kent Road SE15 1DZ
67 Windermere Point Old Kent Road SE15 1DZ
64 Windermere Point Old Kent Road SE15 1DZ
65 Windermere Point Old Kent Road SE15 1DZ
70 Windermere Point Old Kent Road SE15 1DZ
71 Windermere Point Old Kent Road SE15 1DZ
68 Windermere Point Old Kent Road SE15 1DZ
69 Windermere Point Old Kent Road SE15 1DZ
63 Windermere Point Old Kent Road SE15 1DZ
57 Windermere Point Old Kent Road SE15 1DZ

Flat 29 Heversham House Tustin Estate SE15 1EL
Flat 23 Heversham House Tustin Estate SE15 1EL
Flat 6 Heversham House Tustin Estate SE15 1EJ
Flat 7 Heversham House Tustin Estate SE15 1EJ
Flat 4 Heversham House Tustin Estate SE15 1EJ
Flat 5 Heversham House Tustin Estate SE15 1EJ
Flat 21 Heversham House Tustin Estate SE15 1EL
Flat 22 Heversham House Tustin Estate SE15 1EL
Flat 8 Heversham House Tustin Estate SE15 1EJ
Flat 9 Heversham House Tustin Estate SE15 1EJ

58 Windermere Point Old Kent Road SE15 1DZ
55 Windermere Point Old Kent Road SE15 1DZ
56 Windermere Point Old Kent Road SE15 1DZ
61 Windermere Point Old Kent Road SE15 1DZ
62 Windermere Point Old Kent Road SE15 1DZ
59 Windermere Point Old Kent Road SE15 1DZ
60 Windermere Point Old Kent Road SE15 1DZ
72 Windermere Point Old Kent Road SE15 1DZ
Flat Above 885 Old Kent Road SE15 1NL
303 Ilderton Road London SE15 1NW
840 Old Kent Road London SE15 1NQ
1 Ambleside Point Tustin Estate Patterdale Road SE15 1EA
10 Ambleside Point Tustin Estate Patterdale Road SE15 1EA
Unit 13 Canterbury Industrial Park SE15 1NP
73 Windermere Point Old Kent Road SE15 1DZ
Canterbury Arms 871 Old Kent Road SE15 1NX
The Redeemed Christian Church Of God 30 Wagner Street SE15 1NN
885 Old Kent Road London SE15 1NL
887 Old Kent Road London SE15 1NL
4 Windermere Point Old Kent Road SE15 1DY
5 Windermere Point Old Kent Road SE15 1DY
35 Windermere Point Old Kent Road SE15 1DY
36 Windermere Point Old Kent Road SE15 1DY
8 Windermere Point Old Kent Road SE15 1DY
9 Windermere Point Old Kent Road SE15 1DY
6 Windermere Point Old Kent Road SE15 1DY
7 Windermere Point Old Kent Road SE15 1DY
34 Windermere Point Old Kent Road SE15 1DY

29 Windermere Point Old Kent Road SE15 1DY
3 Windermere Point Old Kent Road SE15 1DY
27 Windermere Point Old Kent Road SE15 1DY
28 Windermere Point Old Kent Road SE15 1DY
32 Windermere Point Old Kent Road SE15 1DY
33 Windermere Point Old Kent Road SE15 1DY
30 Windermere Point Old Kent Road SE15 1DY
31 Windermere Point Old Kent Road SE15 1DY
37 Windermere Point Old Kent Road SE15 1DZ
49 Windermere Point Old Kent Road SE15 1DZ
50 Windermere Point Old Kent Road SE15 1DZ
47 Windermere Point Old Kent Road SE15 1DZ
48 Windermere Point Old Kent Road SE15 1DZ
53 Windermere Point Old Kent Road SE15 1DZ
54 Windermere Point Old Kent Road SE15 1DZ
51 Windermere Point Old Kent Road SE15 1DZ
52 Windermere Point Old Kent Road SE15 1DZ
46 Windermere Point Old Kent Road SE15 1DZ
40 Windermere Point Old Kent Road SE15 1DZ
41 Windermere Point Old Kent Road SE15 1DZ
38 Windermere Point Old Kent Road SE15 1DZ
39 Windermere Point Old Kent Road SE15 1DZ
44 Windermere Point Old Kent Road SE15 1DZ
45 Windermere Point Old Kent Road SE15 1DZ
42 Windermere Point Old Kent Road SE15 1DZ
43 Windermere Point Old Kent Road SE15 1DZ
11 Ambleside Point Tustin Estate Patterdale Road SE15 1EA
51 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
52 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
49 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
50 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
55 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
56 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
53 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
54 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
48 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
42 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
43 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
40 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
41 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
46 Ambleside Point Tustin Estate Patterdale Road SE15 1EB
47 Ambleside Point Tustin Estate Patterdale Road SE15 1EB

Flat 32 Heversham House Tustin Estate SE15 1EL
Flat 44 Heversham House Tustin Estate SE15 1EL
Flat 45 Heversham House Tustin Estate SE15 1EL
Flat 42 Heversham House Tustin Estate SE15 1EL
Flat 43 Heversham House Tustin Estate SE15 1EL
Flat 48 Heversham House Tustin Estate SE15 1EN
Flat 49 Heversham House Tustin Estate SE15 1EN
Flat 46 Heversham House Tustin Estate SE15 1EL
Flat 47 Heversham House Tustin Estate SE15 1EN
Flat 41 Heversham House Tustin Estate SE15 1EL
Flat 35 Heversham House Tustin Estate SE15 1EL
Flat 36 Heversham House Tustin Estate SE15 1EL
Flat 33 Heversham House Tustin Estate SE15 1EL
Flat 34 Heversham House Tustin Estate SE15 1EL
Flat 39 Heversham House Tustin Estate SE15 1EL
Flat 40 Heversham House Tustin Estate SE15 1EL
Flat 37 Heversham House Tustin Estate SE15 1EL

Flat 38 Heversham House Tustin Estate SE15 1EL
Ground Floor Right 881-883 Old Kent Road SE15 1NL
Arch 77 876 Old Kent Road SE15 1NQ
Living Accommodation Canterbury Arms SE15 1NX
Ground Floor Left 881-883 Old Kent Road SE15 1NL
Arch 68 897a Old Kent Road SE15 1NL
Arch 69 897a Old Kent Road SE15 1NL
Railway Arches 72 To 74 876 Old Kent Road SE15 1NQ
Flat A 28 Wagner Street SE15 1NN
Flat B 28 Wagner Street SE15 1NN
1a Ambleside Point Tustin Estate Patterdale Road SE15 1EA
2 Hornshay Street London SE15 1HB
Arch 57 Ilderton Road SE15 1NW
313-320 Ilderton Road London SE15 1NW
349 Ilderton Road London SE15 1NW
321-343 Ilderton Road London SE15 1NW
Arch 70 897a Old Kent Road SE15 1NL
Flat 17 Heversham House Tustin Estate SE15 1EJ
Flat 18 Heversham House Tustin Estate SE15 1EJ
Flat 15 Heversham House Tustin Estate SE15 1EJ
Flat 16 Heversham House Tustin Estate SE15 1EJ
Flat 20 Heversham House Tustin Estate SE15 1EJ
Flat 3 Heversham House Tustin Estate SE15 1EJ
Flat 19 Heversham House Tustin Estate SE15 1EJ
Flat 2 Heversham House Tustin Estate SE15 1EJ
Flat 14 Heversham House Tustin Estate SE15 1EJ
301 Ilderton Road London SE15 1NW
Flat 1 Heversham House Tustin Estate SE15 1EJ
Arch 71 897a Old Kent Road SE15 1NL
1 Hornshay Street London SE15 1HB
Flat 12 Heversham House Tustin Estate SE15 1EJ
Flat 13 Heversham House Tustin Estate SE15 1EJ
Flat 10 Heversham House Tustin Estate SE15 1EJ
Flat 11 Heversham House Tustin Estate SE15 1EJ
Flat 50 Heversham House Tustin Estate SE15 1EN
Flat 97 Heversham House Tustin Estate SE15 1ES
Flat 98 Heversham House Tustin Estate SE15 1ES
Flat 95 Heversham House Tustin Estate SE15 1ES
Flat 96 Heversham House Tustin Estate SE15 1ES
Tustin Community Centre 328 Ilderton Road SE15 1NT
1 Windermere Point Old Kent Road SE15 1DY
Flat Above 881 Old Kent Road SE15 1NL
Flat Above 883 Old Kent Road SE15 1NL
Flat 94 Heversham House Tustin Estate SE15 1ES
Flat 88 Heversham House Tustin Estate SE15 1ES
Flat 89 Heversham House Tustin Estate SE15 1ES
Flat 86 Heversham House Tustin Estate SE15 1ES
Flat 87 Heversham House Tustin Estate SE15 1ES
Flat 92 Heversham House Tustin Estate SE15 1ES
Flat 93 Heversham House Tustin Estate SE15 1ES
Flat 90 Heversham House Tustin Estate SE15 1ES
Flat 91 Heversham House Tustin Estate SE15 1ES
10 Windermere Point Old Kent Road SE15 1DY

APPENDIX 2

Consultation responses received

Internal services

Economic Development Team

Statutory and non-statutory organisations

Environment Agency

Historic England

London Underground Limited

Metropolitan Police Service (Designing out Crime)

Natural England - London Region & South East Region

Network Rail (Planning)

Thames Water - Development Planning

Neighbours and local groups

Bptw Partnership 40 Norman Road SE10 9QX

Flat 25 Heversham House Tustin Estate SE15 1EL

14 Regent'S Wharf All Saints Street NI 9RL

22 Windermere Point Old Kent Road SE15 1DY

27 Farrow Lane London SE14 5DB

45 Farrow Lane London SE14 5DB

47 Farrow Lane New Cross SE14 5DB

49 Farrow Lane New Cross

53 Farrow Lane SE14 5DB