

Item No. 6.2	Classification: Open	Date: 15 January 2019	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 17/AP/4612 for: Full Planning Application</p> <p>Address: 49-53 Glengall Road, London</p> <p>Proposal: ORIGINAL DESCRIPTION Demolition of all existing buildings and structures (excluding some of the facades along Glengall Road and Bianca Road and the industrial chimney) and erection of a part 6, 8 and 15 storey mixed-use development comprising 3,855 sqm (GIA) of flexible workspace (Use Class B1) and 181 residential units (Use Class C3) with amenity spaces and associated infrastructure.</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> <p>REVISED DESCRIPTION Demolition of all existing buildings and structures (excluding some of the facades along Glengall Road and Bianca Road and the industrial chimney) and erection of a part 6, 8 and 15 storey mixed-use development comprising 3,716 sqm (GIA) of flexible workspace (Use Class B1(c) and B2/B8) and 181 residential units (Use Class C3) with amenity spaces and associated infrastructure.</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 09/12/2017		Application Expiry Date 10/03/2018	
Earliest Decision Date 01/03/2018			

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 14 June 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 14 June 2019 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 282 of this report.

EXECUTIVE SUMMARY

3. This major application seeks to redevelop an existing light industrial and distribution site on the eastern side of Glengall Road to provide a mixed-use commercial and residential development of 181 units and 3716sqm of B1(c) and B2/B8 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 35% affordable housing by habitable rooms which equates to 61 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(c) and B2/B8 Use and would include units of varying size and improved servicing arrangements.
5. The proposal would include a single stepped building of 6, 8 and 15 storeys in height, would be of a high quality of design and would 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 there 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 2 accessible on-street parking spaces and future occupiers would be prevented from obtaining parking permits on the surrounding streets. 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



Figure 1. Aerial view of site within red outline

9. The application site is roughly rectangular in shape and the combined area measures approximately 0.44 hectares. The site is formed of several low-grade buildings currently occupied by PSG Group Limited who are an independent stockist, converter and distributor of polyester film primarily used in food packaging. It comprises a mix of low-rise, predominantly brick structures with gable frontages and an industrial chimney; and has an existing floor area of approximately 3,560 sqm (GIA). The application site is bordered on Glengall Road by a brick wall with three access points for goods, waste collection and an electrical sub-station.
10. The site is bounded along its northern edge by Bianca Road and a number of low rise industrial buildings on its northern side.



Figure 2. Photograph of site along Bianca Road, retained brick elevation.

11. To the west, the application site is bounded by Glengall Road with the. 66-80 Glengall Road terrace located on its western side, alongside the Travellers site at Breidale Close and the entrance to the Glengall Wharf community garden. The road rises above the former Surrey Canal bridge close to the junction of Bianca Road and Glengall Road.



Figure 3. Photograph of site from Glengall Road, south facing



Figure 4. Photograph of site from Glengall Road, north facing

12. The application site is bounded along its eastern edge by a number of low-rise industrial and studio sites that front onto Heymerle Road.



Figure 5. Photograph of from the corner of Heymerle Road and Latona Road

13. To the south, the application site is bounded by low rise mixed use residential and industrial/commercial buildings that front on to Latona Road: The site at 57 Glengall Road, currently occupied by Gadmon Industries which is a drain lining supply company, has submitted a planning application for the refurbishment and part-redevelopment of these existing buildings and is currently being determined by LBS (LPA ref. 17/AP/2952). Beyond this, on the southern side of Latona Road are the four-storey high residential blocks of the Unwin Estate.



Figure 6. Residential and commercial properties on Latona Road, east facing

14. The surrounding area comprises a mixture of buildings used for industrial, commercial purposes and residential purposes.
15. The site is not located within a conservation area. However it is located close to the following four conservation areas:
 - 138m from the Glengall Road Conservation Area to the north of the application site.
 - 328m from the Cobourg Road Conservation Area to the north east of the site
 - 288m from the Trafalgar Avenue Conservation Area to the north east of the site
 - 227m from the northern edge of the Peckham Hill Street Conservation Area that is located to the south of the application site.
16. In terms of listed buildings, the application site does not benefit from statutory listing. The following Grade II listed buildings are located close to the application site:
 - 1-9 Glengall Terrace – 190m to north west off Glengall Road
 - Listed villas on 5-31 Glengall Road and 24-34 Glengall Road – 190m-320m to north
 - Celestial church of Christ and attached wall and railings, Glengall Road – 180m to the south
 - New Peckham mosque (former church of St Mark), Cobourg Road – 330m to the north west across Burgess Park.

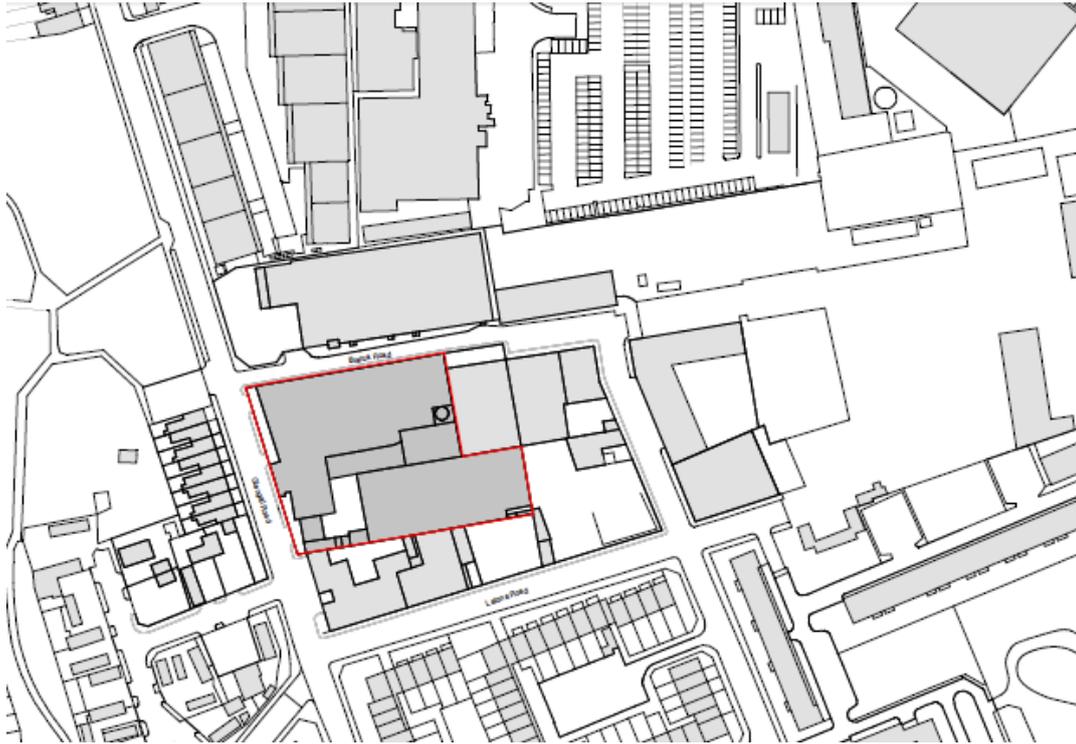


Figure 7: Site plan

17. The site is located beneath the proposed landmark viewing corridor and wider assessment area of the draft New Southwark Plan protected borough view of St Paul's Cathedral from Nunhead Cemetery. It does not fall within the background assessment area of a view protected by the London Views Management Framework.
18. The site has a PTAL rating of 3. It is well served by buses that provide regular connections both north and south to key transport, employment and leisure destinations, with the nearest bus stops located between 250m and 450m to the north-west of the site on Trafalgar Avenue (B215) and the Old Kent Road (A2).

Details of proposal



Figure 8. CGI view of proposed scheme along Glengall Road and Bianca Road from edge of Burgess Park.

19. The proposal consists of a single, stepped building of mixed-use development comprising:
 - A total of 6 storeys fronting Glengall Road (W);
 - A total of 8 storeys fronting Bianca Road (N) and
 - A total of 15 storeys to the rear of the site on Latona Road
 - An internal courtyard with a south-facing opening to allow daylight and sunlight penetration.
20. The tallest part of the building would be 52.2metres AOD.
21. The proposals involve demolition of all the existing commercial buildings and structures to allow for a mixed use building with employment and residential uses. However, following pre-application advice from officers, it was agreed that the part retention of the original industrial brick façades along Glengall Road and Bianca Road, as well as the industrial chimney, would enable the proposed new buildings to better respond to the industrial “grit” and character of the area. These existing built elements are therefore to be retained.
22. The elevations would feature window openings arranged in a broadly regular pattern, together with a range of projecting balconies and roof terraces.
23. The internal arrangement of accommodation would comprise commercial (Class B1(c) and B2/B8 commercial floorspace at ground and mezzanine levels only, with the upper floors to be exclusively in residential (Class C3) use. Details of the commercial and residential elements follow below.



Figure 9. CGI view of proposed scheme along Glengall Road and Latona Road

Commercial floorspace

24. The 3715sqm of employment uses would be provided at ground floor and mezzanine floors in the form of thirteen flexible workspaces capable of use by small to medium sized enterprises, start up and creative type businesses within the B1(c) and B2/B8 use classes. The B2/B8 floorspace would be double height. The proposal would exceed full re-provision of commercial floor space when compared with the existing provision as detailed below:

Table 1. Commercial floorspace provision

	Existing	Proposed (total)	Difference
Total	3560sqm	3715sqm	+156sqm

Residential accommodation

25. The development will provide 181 new residential units which consist of 120 private units and 61 affordable units. The affordable units would be split between 40 units for social rent and 21 units intermediate/shared ownership.
26. The proposed affordable housing offer equates to a total of 177 habitable rooms or 35% of the 504 habitable rooms.
27. The 177 affordable habitable rooms would be split with 124 habitable rooms (70%) for

social rent and 53 habitable rooms (30%) for Intermediate tenure.

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 35% affordable housing.

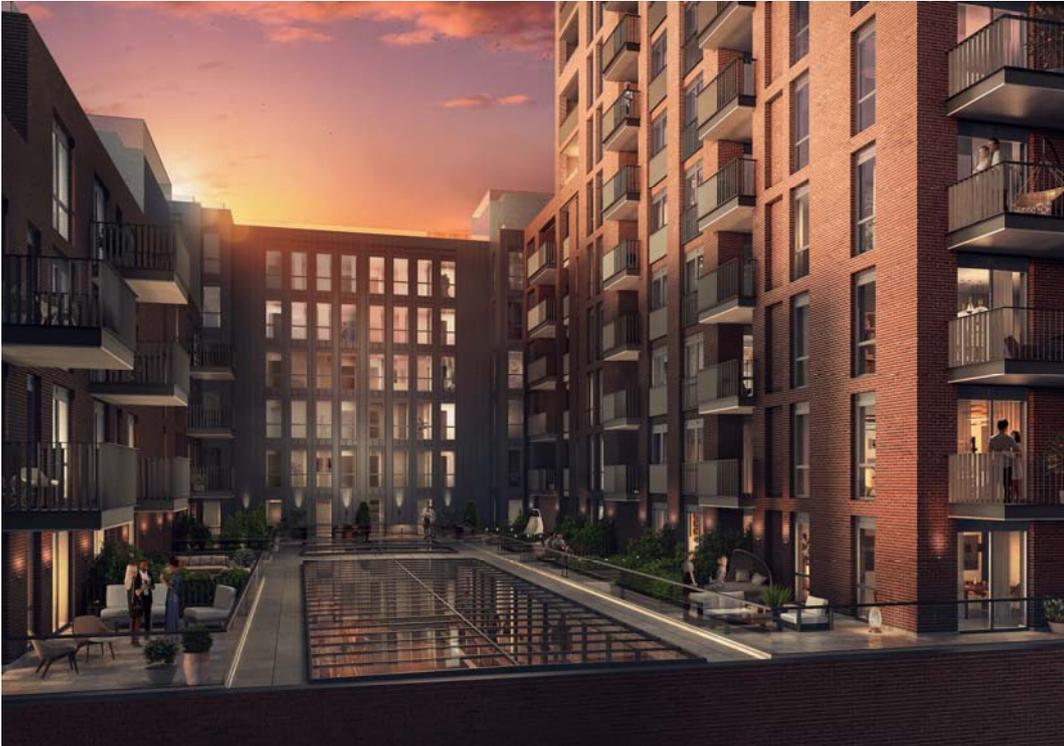


Figure 10: CGI view of internal courtyard

29. Private and communal amenity space would be provided in the form of projecting private balconies, communal amenity space and children's play space.

Ancillary flexible community space

30. A 18.92sqm space of ancillary flexible community space is proposed for the ground floor fronting Glengall Road. Access will be provided to local community groups to use or rent the space. Details will be agreed through the s106 legal agreement.

Public realm and servicing

31. The proposal would be car free apart from two accessible disabled parking spaces which would be introduced on the highway at eastern side of Glengall Road.
32. Enhancements to the public realm are proposed in the form of new public yard space named 'Latona Yard' within the centre of the site that is accessed by a pedestrian route from Bianca Road, and tree planting and the widening existing footway to Glengall Road. The east elevation of the tower would part oversail the proposed yard at approximately 10m AOD.

Revisions to the scheme

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;
 - improve internal layouts;
 - introduce a revised internal commercial corridor to provide visual link to Latona Yard;
 - Latona Yard improvements.
33. Following the applicant's meeting with Vital Old Kent Road on Wednesday 19 December 2018, the following amendments to improve the industrial fit out have been made that will be secured by condition or revised plans:
- The commercial lift is now 3m x 3.5m in size to accommodate larger materials, goods and equipment;
 - The corridor around the lift has been widened to 3m on both the ground and mezzanine levels to improve capacity; and
 - The large double-height unit along Bianca Road has been rationalised so that the total commercial floorspace of 3,716 sqm (GIA) - representing a 156 sqm (GIA) increase from the existing.
34. 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 height within the centre of the Latona Road, Bianca Road, Glengall Road and Haymerle Road block.
35. A second stage of statutory consultation was undertaken on the revised scheme.

Planning history

36. None

Pre-application

37. Formal and informal pre-application discussions took place 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

Nyes Wharf

Nyes Wharf, Frensham Street, London, SE15 6TH

38. 17/AP/4596
Demolition of existing buildings and erection of mixed-use scheme comprising 1,193sqm Class B1 floorspace at ground and mezzanine levels; with 153 Residential units (Class C3) above in a building ranging from 9 to 18 storeys (max height 56.202m) with hard and soft landscaping including a new park and associated infrastructure works, including three disabled spaces and cycle parking. (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).

Granted subject to legal agreement at main planning committee on 3 September 2018.

39. The scale of the proposal is slightly lower in height than the scheme approved by planning committee in spring 2018 at Nyes Wharf, ranging from 9 to 18 storeys, with a maximum height of 56.202m. (17/AP/4596). CGI image and site location plan below:



Figure 11. CGI of recently approved Nye's Wharf scheme (17/AP/4596)

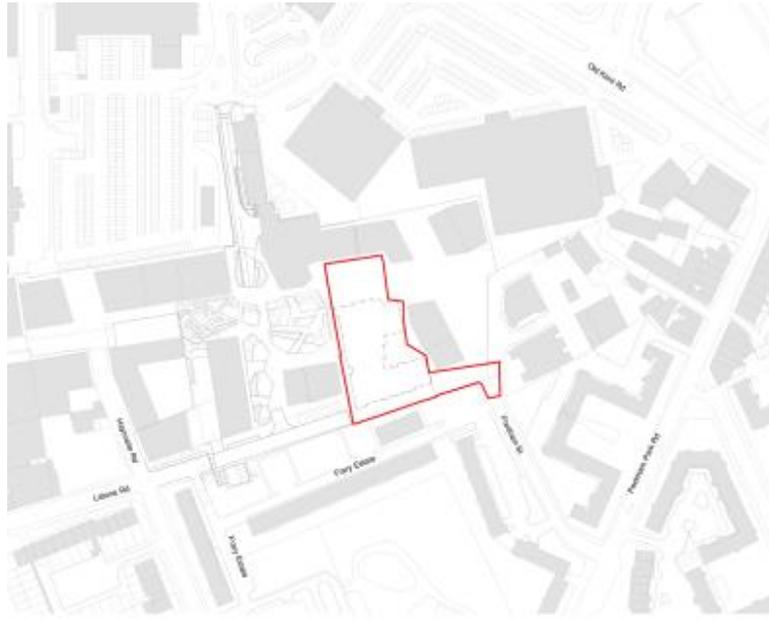


Figure 12. Red line boundary illustrates the location of the approved Nyes Wharf scheme (17/AP/4596) to the east of the application site.



Figure 13. Emerging contextual building heights showing the approved Nyes Wharf scheme (17/AP/4596) at 18 storeys, and wire line of the submitted Malt Street proposal (17/AP/2773) up to 39 storeys. This application is proposed at 6, 8 and 15 storeys.

Malt Street Regeneration Site, Land Bounded By Bianca Road, Latona Road, Haymerle Road, Frensham Street And Malt Street, London SE1

40. 17/AP/2773
Hybrid application comprising a full planning application for Phase 1 and outline planning permission for subsequent phases:
41. Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area (Phase 1) for the erection of a total of 4 buildings, two at 7 storeys (B9&B12), one at 15 storeys (B10), and one at 44 storeys (B4) (max height 147.12m AOD) to provide 420 homes, 1,197 sqm GEA of Class B1(c) floorspace and 785 sqm GEA of non-residential floor space within classes A1-A4, Class B1 and Class D1 and D2 use, an energy centre (750 sqm) and new public open space and public realm with 131 on street and basement car parking spaces and 697 cycle spaces.
42. Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and the erection of a seven buildings (B1, B2, B3, B5, B6, B7, B11) ranging in height from 5 to 39 storeys (max height 132.9m AOD) to provide up to 88,052sqm floorspace GEA, comprising up to 880 residential units, up to 3,316 sqm GEA of Class B1(c) floorspace and up to 1,702sqm GEA of non-residential floor space within classes A1-A4, Class B1, Class D1 and D2 use and 4 car parking spaces at ground level and up to 1,453 cycle spaces, with associated new open space, public realm, car parking and associated works.
43. 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.



Figure 14. Illustrative CGI of Malt Street proposal from Latona Road

44. This planning application is currently being determined.

57 Glengall Road, London, SE15 6NF
45. 17/AP/2744
Continued use of first floor as a residential flat (use class C3) for temporary period of two years.
Granted 12 September 2017.
46. 17/AP/2952
Refurbishment of existing building, redevelopment of outbuildings and addition of two storeys to provide 5 no. B1 commercial units and 9 no. residential flats.
47. 16/AP/4451
Extant consent for alterations to the existing roof, the use of the 2nd floor for residential accommodation, and the conversion of the 1st floor back to B1 (expires in January 2020).
48. This planning application is currently being determined.

3-5 Latona Road, London, SE15 6RX
49. 18AP4003
Proposed development to add three new storeys of residential accommodation to the existing building at 3-5 Latona Road. The existing Ground, First and Second floor will retain its commercial use. The proposed residential accommodation comprises ten flats in total; 2x1-Beds, 6x2-Beds and 2x3-Beds.
50. This planning application is currently being determined.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

51. 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;
 - Density;
 - Tenure mix;
 - Dwelling mix;
 - Wheelchair dwellings;
 - Quality of residential accommodation;
 - Outdoor amenity space, children's playspace and public open space
 - Impact on the amenity of neighbouring residential occupiers and the surrounding area;
 - Design quality;
 - Heritage and views
 - Quality of commercial floorspace;

- Trees, landscaping and biodiversity;
- Transport and highway matters, including cycle and refuse storage;
- Environmental matters;
- Energy and sustainability;
- Development viability;
- Planning obligations and Community Infrastructure Levy;
- Consultation responses: Members of the public;
- Consultation responses: Internal and external consultees.

Planning policy designations

Adopted

- 52.
- Old Kent Road Preferred Industrial Location – Strategic;
 - Old Kent Road Action Area;
 - Urban density zone;
 - Air quality management area.

Emerging New Southwark Plan designations

- North Southwark and Roman Roads Archaeological Priority Area;
- Old Kent Road Major Town Centre;
- Old Kent Road Opportunity Area;
- Nunhead Cemetery Borough View.

National Planning Policy Framework (the Framework)

53. 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'.
54. 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 63 - 78 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 (2018, as updated)

The London Plan 2016

55. 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

56. 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.

57. 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

- 58. 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

- 59. 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.
- 60. 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
 - 3.15 – Conserving the historic environment
 - 3.17 – Listed buildings
 - 3.18 – Setting of conservation areas, listed buildings and World Heritage sites
 - 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

- 61. 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

- 62. 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

- 63. 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)

- 64. 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.
- 65. 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 10 which covers the area between the Old Kent Road, Glengall Road, Peckham Park Road and Bianca Road area. Requirements for this allocation site include replacement of existing employment floor space, provision of housing and car-free development.



Figure 15: Site location within Old Kent Road Opportunity Area



Figure 16: Indicative masterplan for proposals site OKR 10 within the Further Preferred Option of Old Kent Road Area Action Plan (OKR AAP). Application site

highlighted in yellow.

New Southwark Plan

66. 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.
67. 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.
68. 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 in terms of development, land use, including consideration of emerging policy for the Old Kent Road Opportunity Area

69. 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 proposes an increase of 156sqm of commercial floorspace above the existing commercial floorspace. This is consistent with 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.
70. 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).

71. 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.
72. 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.
73. 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)

74. 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.
75. The OKR AAP places the site within the proposed Action Area Core, and within proposal site OKR 10 which covers the area between the Old Kent Road, Glengall Road, Peckham Park Road and Bianca Road
76. 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.
77. 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.
78. In determining whether the principle of the proposed development would be acceptable in land use terms, specifically the introduction of housing in the SPIL, 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.

79. Officers consider that the key benefits arising from the proposal would be as follows.

Increase of employment floorspace

80. The proposed scheme would deliver a 3716sqm of employment floorspace within a more efficient site layout that optimises the use of land across the site. This equates to an increase of 156sqm over the existing provision of 3560sqm.

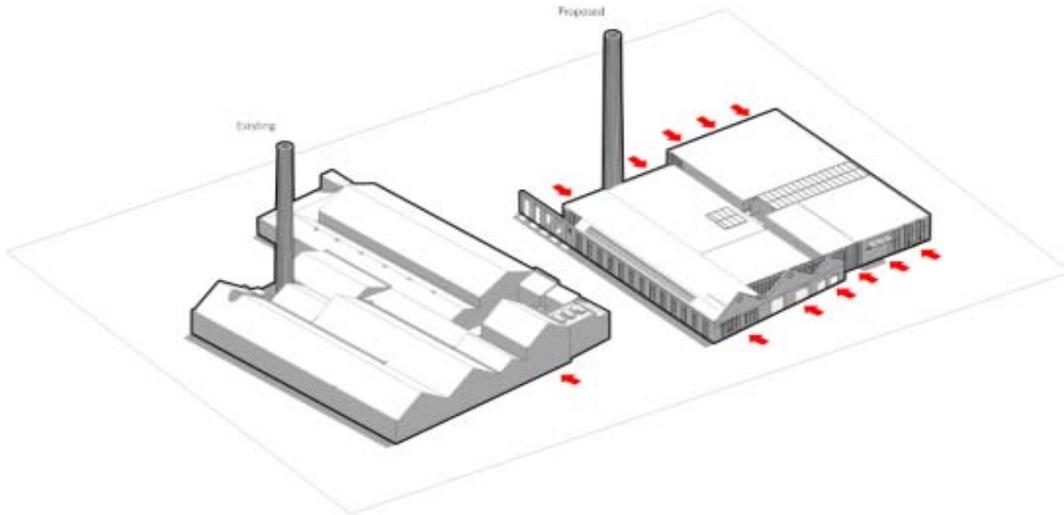


Figure 17.: Illustration of existing and proposed commercial floorspace.

81. The employment uses would be provided at ground and first floor in the form of 13 workspaces. The re-provided and additional floorspace would provide high-quality, modern and flexible workspace for occupation by one or more small-to-medium sized enterprises, start-up and/or creative businesses.

82. The proposed commercial units fall within the B1(c), B2 and B8 use classes. To meet the policy requirements and to improve the likelihood of industrial occupiers leasing the units, it is recommended that following conditions are included:

- Restriction of land use to B1(c) and B2/B8 in specific areas of the commercial floorspace. All commercial floorspace will be conditioned.
- the minimum spec of B1(c) internal fit out for the proposed commercial units would be secured through condition and a clause in the Section 106 Agreement.

Job creation

83. The existing FTE employment levels on the site come to around 25-30 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. (3716sqm). This implies that the development would be expected to create between 68-79 direct jobs (FTE) allowing for a mix of B1(c) and B2/B8 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 a 100% uplift of FTE jobs.

84. 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.
85. In addition to the direct operational employment, the retail, leisure and other expenditure of the residents of the proposed 181 units will support additional jobs in shops, restaurants and other services within the Old Kent Road area.
86. This development would be expected to deliver 42 sustained jobs to unemployed Southwark residents, 42 short courses, and take on 11 construction industry apprentices during the construction phase, or meet the Employment and Training financial contribution of a maximum of £203,400.

Business relocation and retention

87. The existing use of the application site is primarily distribution and industrial use, and is used by PSG Group Ltd who are stockists, distributors and converters of polyester film. Polyester film is used for industrial, packaging and printing and stationary purposes.
88. The applicant has provided a letter from the current tenant who states that they will be moving location to Leicestershire and do not need to be relocated.

Affordable workspace

89. The applicant has agreed to provide affordable workspace of 372sqm 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

90. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. The applicant has committed to secure a specialist workspace provider, the details of which are to be set out in a Commercial Units Management Plan (CUMP). The specialist workspace provider will also be tasked with marketing and managing the affordable workspace. The CUMP will be secured through a section 106 planning obligation.

Provision of housing, including affordable housing

91. The scheme would provide 181 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.

92. The draft New London Plan was further amended in August 2018 and in particular changes were made to policy H5 Delivering Affordable Housing and policy H6 Threshold Levels. Policy H5 4a states that “industrial land appropriate for residential use in accordance with Policy E delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.” Whilst paragraph 4.5.4C goes on to state that “The Mayor expects that residential proposals on industrial land should deliver at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.”
93. Policy H6 “Threshold approach to applications” identifies the threshold at which a viability assessment wouldn’t be required for development on industrial land as being 50% “where the scheme would result in a net loss of industrial capacity”.
94. Paragraph 4.6.6 then sets out that “Given the difference in values between industrial and residential development, all residential development proposals that would result in a net loss of industrial capacity on Strategic Industrial Locations, Local Significant Industrial Sites or Non Designated Industrial Sites are expected to provide at least 50 per cent affordable housing. If this is not possible, detailed viability evidence will be needed to justify a lower level of affordable housing.” This last sentence is important as otherwise these policies would be contrary to National Planning Policy guidance in respect of the tests of viability and wouldn’t be sound.
95. In this instance there is no net loss of industrial capacity and there is therefore no requirement to provide 50% affordable housing (albeit even if there was some loss that would be subject to viability testing as set out in paragraph 4.6.6). The scheme’s viability has in any case been independently assessed as required by Southwark’s plan policies and the 35% offer is considered to be the maximum that can be provided. Furthermore in drafting the OKRAAP LBS have evidence based a localised affordable threshold. It is noted that paragraph 4.6.13 of the draft NLP which referenced this approach has been deleted. Nonetheless it remains current guidance in the Mayors Housing SPG.

Impact of the proposed residential use

96. It is recognised that the introduction of residential units could restrict and prejudice the operation of existing businesses in the area. Given the existing mix of residential and commercial uses carried out within the area, it is not felt that these existing businesses would be prejudiced and they could continue to operate and co-exist with the introduction of further residential uses provided schemes are well designed for this mix.
97. In addition the developer will provide, through a S278 agreement, the proposed 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 the draft Area Action Plan and their provision is welcomed. Conditions are recommended in relation to noise and sound insulation within the building and in relation to servicing hours.

98. 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 are located on the southern side of Latona Road, immediately adjacent to the southern boundary of the site at 55 and 57 Glengall Road and the western side of Glengall Road Street at 66-80 Glengall Road and the Travellers site at Brideale Close.

Prematurity

99. 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 led 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.

Conclusion on land use

100. 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 use into the SPIL so would represent a departure from the adopted development plan.
101. This must therefore be weighed against the benefits of the scheme which include:
- the provision of 181 homes, of which 35% or 61 units would be affordable;
 - Substantial reprovision of 3716 sqm of B1(c) and B2/B8 commercial floorspace, which includes an increase of 156sqm
 - 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.
102. 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.
103. 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

104. 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

- 105. 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.
- 106. 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.
- 107. In total, 504 habitable rooms would be provided in the development. The development would provide a total of 177 affordable habitable rooms which would equate to an overall provision of 35%. The level of provision is therefore acceptable and policy compliant. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
- 108. The 177 affordable habitable rooms would be split to meet the 70/30 affordable tenure policy requirement for a 35% policy compliant scheme with 124 social rent habitable rooms and 53 Intermediate habitable rooms.
- 109. In light of this the proposed offer would:

Table 1: Affordable housing

Units	Social rent	Intermediate (shared ownership)	Total
1 bed	7	10	17
2 bed	22	9	31
3 bed	11	2	13
Total	40	21	61

- 110. Overall, the proposal would provide a total of 61 affordable units in a mix of unit sizes within the building, 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.

111. For clarity, the locations of the 61 affordable units that are proposed within the scheme are set out below:

Table 2. Unit locations and totals

Core within the scheme	Number of Private units	Number of Social Rent units	Number of Intermediate units	Total	Number of wheelchair units
1 (Glengall Road, South core)	0	19	0	19	1
2 (Glengall Road, North core)	0	21	5	26	11
3 (Bianca Road, North east corner core)	14	0	16	30	6
4 (Tower core)	106	0	0	106	0
Total	120	40	21	181	18

Density

112. Policy 3.4 (Optimising Housing Potential) of the London Plan 2016 states that development should optimise housing output for different types of location within the relevant density range. It also requires local context, design principles and public transport capacity to be taken into account. Strategic Policy 5 (Providing New Homes) of the Core Strategy 2011 sets out the density ranges that residential and mixed use developments are expected to meet. As the application site is located within the Urban Zone, the proposed development would be expected to fall within a density range of 200 to 700 habitable rooms per hectare. This policy also clearly states, however, that within opportunity areas and action area cores, the maximum densities may be exceeded when developments are of an exemplary standard of design. Criteria for exceptional design are set out in section 2.2 of the Residential Design Standards SPD (2015).
113. The site occupies an area of 0.44 hectares. The residential component of the proposed development would comprise 504 habitable rooms and the commercial component would deliver the equivalent of 138 habitable rooms. This results in a total density of 1,443 habitable rooms per hectare.

114. This is clearly significantly higher than the upper limit set by Strategic Policy 5 for the Urban Density Zone of 700 hab rooms per hectare, so it is necessary to assess the proposal against the exception made for Opportunity Areas. There is a pressing need to optimise the use of land in London, particularly in Opportunity Areas. The proposal would result in a good standard of accommodation, with many of the 'exemplary' requirements of the Southwark Residential Design Standards SPD met. This is summarised in the table below:

Table 3. Exemplary residential design standards

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	Each of the proposed apartments would have built-in storage broadly in compliance with the Residential Design Standards SPD. There would also be scope, through innovative/flexible design, for the cycle store rooms within each core to accommodate larger items such as pushchairs, the details of which will be resolved at the condition stage in collaboration with Southwark Council's Transport Planning team.
Exceed minimum privacy distances	Minimum privacy distances would be exceeded: 20m (Glengall Road), 12m+ (Bianca Road)
Good sunlight and daylight standards	Good sunlight and daylight standards would be achieved: acceptable within BRE guidelines for an urban context
Exceed minimum ceiling heights of 2.3 metres	All habitable rooms within all proposed dwellings would have floor-to-ceiling heights of 2.5 metres.
Exceed amenity space standards (both private and communal)	All 3-bed units have 10 sqm private balconies. Where there are deficits against 1 and 2 bed units, this is made up for in the communal amenity space. Overall, there is a 45 sqm over provision within the communal and child play space areas.
Secure by Design certification	The scheme would be capable of achieving Secure by Design accreditation. Conditions to require this are recommended.
No more than 5% studio flats	3% (6 in total) of the proposed units would be studio flats.
Maximise the potential of the	The potential of the site would be maximised.

site	delivering additional and improved commercial floorspace, new dwellings achieving an exemplary standard of design and including a large proportion of family-sized units, significant outdoor space and play space, all without compromising local visual or residential amenity.
Include a minimum 10% of units that are suitable for wheelchair users	10% of the proposed units would be suitable for wheelchair users.
Excellent accessibility within buildings	The accessibility within the buildings would be excellent and is Part M2 compliant as a minimum.
Exceptional environmental performance	The environmental performance would be fully policy compliant, taking into account a contribution to the Carbon Offset Fund
Minimised noise nuisance between flats through vertical stacking of similar room types	The proposed development achieves very high proportion of vertical stacking. Plant rooms have been located in the ground floor off the courtyard, 6m+ beneath the nearest residential units and thus sufficiently far away not to create undue noise disturbance.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and communities in terms of its quality of design (retaining key facades) and regeneration benefits including affordable housing, workspace, investment in local transport and public space.
Include a predominance of dual aspect units	54% (98 units) would be dual or corner aspect.
Have natural light and ventilation in all kitchens and bathrooms	This would not be achieved because almost all bathrooms would be internal. However, this is considered permissible in the interests of achieving a rational and efficient building layout. All kitchens would form part of larger open-plan kitchen/living/dining spaces which themselves would benefit from natural light and natural ventilation.
At least 60% of units contain two or more bedrooms	112 units (62%) of the total number of units across all tenures would have two or more bedrooms.
Significantly exceed the minimum floor space standards	All units would meet the space standards, and comply with the London Plan..

Minimise corridor lengths by having additional cores	The cores have been efficiently designed so that corridor lengths are minimised
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115. For the reasons detailed in the above table, the higher density proposed would not compromise the quality of accommodation and the impacts of the development would be acceptable. It is therefore considered that the exceedance of the density threshold would not warrant withholding permission.

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 4: Unit mix

	Total number units (number)	Total Units (%)
Studios	6	3
1 bed	63	35
2 bed	76	42
3 bed	36	20
Total units	181	100%

117. 62% 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. 6 studios are proposed. 18 wheelchair units (10%) would be provided, which are distributed between tenures and cores. This is considered broadly acceptable.
118. In summary the housing mix would be in accordance the relevant policy.

Wheelchair dwellings

119. Saved Policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users and London Plan Policy 3.8 requires 90% of new housing meets Building Regulations requirement M4 (2) 'accessible and adaptable' and 10% to meet Building Regulations requirement M4 (3) 'wheelchair user dwellings'. This is reiterated in emerging policy in the draft OKR AAP and the NSP.
120. 18 wheelchair units (10%) would be delivered. Wheelchair fit-out would be provided in the social and intermediate tenures across a range of units. The number of wheelchair dwellings meets the policy requirements and the spread across the two affordable tenures is considered acceptable. The units would be required to be fully fitted for first

occupation.

Quality of accommodation

121. 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

122. 54% of the proposed 181 units would be dual aspect. The majority of single aspect units would be west facing towards Glengall Road and Burgess Park or the internal courtyard. 10 north facing single aspect units are proposed facing Bianca Road and benefit from a dual aspect views onto the private balcony. All of the three bed units would be a dual aspect.

Unit sizes

123. All of the proposed units would satisfy the minimum floor areas set out in the London Plan, 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 policy compliant.

Internal daylight within the proposed residential units

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

Daylight

125. 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.
126. In terms of the average daylight factor, 90.7% of the rooms within the scheme obtain an ADF level higher than the British Standard requirements. Close analysis of the layout shows that there are a large number of dual aspect units. A large number of rooms that do not meet the average daylight factor level are bedrooms, and the vast majority of these are part of flats where the lounge/dining area is in itself fully compliant meaning in an overall sense a well-lit flat. There are very few lounge areas falling below the ADF level, however, these have been designed in such a way as to have good levels of daylighting distribution meaning that these too will appear well lit. Overall this means that there are two of 181 units only whereby daylighting might be

considered to be below standard. Internal levels of daylight are shown overall to be good.

Internal Overlooking

127. There would be some opportunities for overlooking between habitable windows of residential units that face onto the internal courtyard. However they would be separated by an 18.5m wide gap. This degree separation is considered acceptable in this instance, as although the Residential Design Standards recommend 22 metres, the internal courtyard is a desirable feature and it is not possible to make it wider so this is a reasonable compromise.

Amenity and play space

128. 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.

129. 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

130. In this case, a total of 1810sqm of private amenity space would need to be provided between the 181 units. In this instance 2018sqm of private amenity space is proposed, with all flats have been provided with private amenity space in the form of balconies and terraces. This is a positive benefit of the scheme. The schedule of private amenity space is:

- 36 x 3 bed units provide 10sqm;
- 76 x 2 bed units provide 7sqm;
- 69 x 1 units provide 5sqm.

Communal amenity space

131. A total of 50sqm communal amenity space is required to be provided within the scheme. A total of 1046sqm of communal amenity and child play space is proposed in two roof level gardens which will be conditioned for detailed design. The proposed

private amenity space (2018sqm) combined with the proposed communal amenity space (1046sqm) would deliver a total amenity space of 3064sqm. This would exceed the total requirement (1860sqm) of amenity space and is therefore acceptable. Details are set out below:

Table 5: Communal Amenity Space

Communal Amenity Space	Location	Size
Communal Space 1	Above Glengall Road block, 5 th floor	380.27sqm
Communal Space 2	Above Bianca Road block, 7 th floor	666.47sqm

132. The detailed design and layout of each of these spaces in conjunction with the overall child play space will be secured by condition.
133. Residents in the tower do not have direct access to the communal amenity space. However, these residents will have 'fob' access to the communal amenity space and child play space.

Children's amenity space

134. Based on the draft New Southwark Plan child play space yield, the development would be required to provide 566sqm of children's play space on site. This will be completely provided on site within the communal amenity space of 1046sqm. An excess of 45sqm is provided over and above the required child space and total amenity space, as detailed in the table below.

Table 6: Amenity and child play space schedule

Type of space	Area
Total private amenity space proposed	2018sqm
Total communal amenity space + child play space required	616sqm
Total private and communal amenity space + child play space required	2426sqm
Total amenity space + child space proposed	3064sqm
Excess	638sqm

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 908sqm for the scheme. 851sqm of public open space is proposed in the proposed Latona Yard and access route from Bianca Road. As such, there is a shortfall of 54sqm 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 £11,070 based on the 181dwellings proposed (at a cost of £205 per sqm as set out in the section 106 SPD) which could go towards off site delivery of open space such as the proposed linear park or Burgess Park, 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 use schemes. 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.

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

139. 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

140. A daylight and sunlight impact assessment was submitted with the planning application to assess the impact on nearby existing residential properties.
141. The neighbouring residential units that have the potential to be impacted in terms of daylight and sunlight are located at:
- 66-80 Glengall Road;
 - 55 Glengall Road;
 - 57 Glengall Road;

- 2-20 Latona Road;
- 36-82 Latona Road;
- Space Studios Haymerle Street.

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



Figure 18: Neighbouring residential properties assessed

66-80 Glengall Road

143. This run of property is a set of four storey terraced houses which are divided into flats. The applicant did not have specific information on the layouts of these flats. The front elevations of these buildings are directly opposite the front elevation of the scheme on Glengall Road. The results show that reductions in excess of 20% will occur to the Vertical Sky Component (VSC) values as a result of the scheme. Contextually however this is somewhat misleading as in daylight terms the existing site is low rise and provides little obstruction to light. Light levels in all floors of these houses are extremely high. In this case it is more informative to review retained levels of light and it can be seen that VSC levels remain from 18%-25% in the basement, 21%-28% to the ground floor, 23%-29% on the first and 26%-31% on the second. This means that the rooms will maintain significantly high levels of daylight and will maintain in excess of a normal level of daylight for an urban area. Sunlight amenity to the property will remain very good after the proposed scheme is implemented.

2-20 and 36-82 Latona Road

144. These are maisonettes within a four storey block on the southern side of Latona Road, and, are removed from the site by the light industrial buildings that border the south of the application site. However, these have still been assessed. Where reductions do occur in excess of 20% these are due to the presence of balcony overhangs serving the entrances to these maisonettes and the impacts restricted to the kitchen areas located on the Latona Road façade. It is considered that these would be fully daylight, as with the floors below, if there were no balconies in place and thus the impact, under BRE guidance is compliant.

55 Glengall Road

145. This flat sits directly adjacent to the proposed scheme and is over three floors above ground. The main windows of this flat do not face directly at the site and consequently our analysis shows that there is minimal impact on the internal distribution of light despite reductions of VSC in excess of 20%.

57 Glengall Road

146. This property sits directly opposite the south elevation of the scheme site and is located on an upper floor of this previously industrial building. An objection was received from the applicant/owner of this property in relation to the potential impact on daylight and sunlight to existing and *proposed* north facing habitable rooms. As such, further testing was undertaken by the applicant to assess the retained levels of daylight based on available information regarding layouts.
147. 17/AP/2744 – temporary permission for the current and continued use of the 1st floor as a residential apartment for 2-years (expires in September 2019) – Existing context.

Vertical Sky Component

148. The bedroom window currently sees around 30% VSC, whereas the two windows serving the family room currently see 28.30% VSC and 22.21% VSC respectively. These existing VSC results are considered relatively high for a dense urban environment. However, all three windows are self-obstructed by the existing building arrangements so that they receive all of their VSC from a “canyon” looking directly outwards. The BRE discusses such types of situation, stating at paragraph 2.2.12: *“A larger relative reduction in VSC may also be unavoidable if the existing window has projecting wings on one or both sides of it...”* Post development, the bedroom window would record 15.82%VSC, whereas the two windows serving the family room would record 14.42% VSC and 10.89%VSC. When compared with the high baseline figures, inevitably these changes would be noticeable. VSC values in the mid-teens (and a smaller proportion below) have been considered by the GLA/London Mayor and Planning Inspectorate on several occasions as acceptable in a dense urban environment such as this, and particularly in regeneration areas such as the OKR Opportunity Area.

No-Sky Line

149. The applicant has also considered the Daylight Distribution (“DD”) contour, as BRE consider that the DD contour should be considered along with the VSC result, where

layouts are known. This was assessed using a layout supplied by the owner of 57 Glengall Road. The DD study effectively divides the areas of the space between those that can see a direct view of the sky at desktop level (i.e. in front of it) and those that cannot (i.e. behind it). In conclusion, there would be minimal impact to the family room and adjacent bedroom, indicated by the small areas of crosshatching. These generally occur at the very extremes of the rooms, i.e. at the back and in the corners. When considering the "proposed" DD results as percentages of the two rooms, the family room would retain over 80% DD contour and the bedroom around 70%. The Building Research Establishment ("BRE") guidance would consider these to be excellent results, particularly in an urban context such as the Old Kent Road Opportunity Area.

Average Daylight Factor

150. The ADF assessment is predominantly for application with new build; however it can provide a useful additional means of considering quality of natural light within rooms where layouts are known. It should be noted that there are other variables such as surface finishes and window transmittance which cannot be accurately measured without undertaking an internal inspection; however reasonable assumptions can be applied. The default recommended ADF targets for new build dwellings are 1% ADF for bedrooms, 1.5% for living areas and 2% for kitchens. As can be seen, at present the bedroom achieves 1.12% ADF, which is in excess of the British Standard minimum ADF target recommendation of at least 1%. The family room achieves 1.76% ADF against a default recommended BS target of at least 1.5% ADF for living areas, or 2% ADF where these include kitchens. 1.5% ADF has been considered by Inspectors as an acceptable alternative target for these types of combined space. Post development, the bedroom would retain 0.72% ADF and the family room 1.09% ADF. Both of these would be below the British Standard ADF target recommendations, but again not considered unusual in a dense urban environment and especially so given the relationship between the two sites. For the same reasons as previously, these results are considered predominantly due to the funnel/canyon effect of the existing context and outlook from these rooms.
151. 16/AP/4451 – extant consent for alterations to the existing roof, the use of the 2nd floor for residential accommodation, and the conversion of the 1st floor back to B1 (expires in January 2020).

Vertical Sky Component

152. A total of four windows were assessed, one of which is a rooflight. The four windows serve two rooms i.e. two windows serving each. The existing values range from 31.11% VSC to 32.89% VSC for the vertical windows, with the rooflight recording 94.45% VSC. These are all considered high for a dense urban environment. The retained VSC value for the three vertical windows are all in excess of 17% post development, which is considered good for a dense urban environment, by reference to GLA/London Mayor and Planning Inspectorate decisions. The change from the high baseline would inevitably be noticeable. The fourth window is a rooflight, which would retain 88.13% VSC, which is excellent.

No-Sky Line

153. The analysis showed that there would be a noticeable no-sky line difference in the family room, given its depth and over-reliance on daylight from the direction of the

proposed development. However, it would retain 45.46% of its area with a direct view of sky, which is not considered unusual for a dense urban environment such as this. This retained value could be significantly increased if the room were to make use of the central lightwell in addition to the windows, as suggested by the consented layouts. The adjacent sitting room, which more clearly makes use of the central lightwell, would be unaffected in terms of no-sky line, thereby demonstrating its significant contribution.

Average Daylight Factor

154. The retained value for the sitting room would be greatly in excess of the default BRE recommendation of 1.5%ADF. The retained result for the family room (1.49%ADF) is considered to be nearly identical to the value of 1.5%ADF found to be an acceptable alternative target where living areas also feature kitchens. The retained results for both rooms would therefore be considered to remain adequate.
155. 17/AP/2952 – proposed scheme for the refurbishment of the existing building and the addition of two extra storeys to provide five commercial units and nine residential flats (pending).
156. This scheme was assessed using the proposed drawings. It should be noted that the applicant/owner of 57 Glengall Road has revised the proposal so the reduction in daylight to the affected north facing windows to the third floor habitable spaces has been mitigated with the removal of a fourth floor balcony.

Vertical Sky Component

157. At second floor, five windows were assessed. Three of the five are understood to serve a proposed dining room and the remaining two a proposed living room. In the existing scenario, these windows record between 29.48%VSC and 33.21%VSC. Post-development, two of the three windows serving a proposed dining room would retain in excess of the BRE default minimum recommendation of at least 27% VSC, with the third retaining close to 18% VSC.
158. The two windows serving the living room would retain 16.54%VSC and 17.80%VSC. As such, there would be noticeable differences to 3 of the 5 windows assessed. In all cases the retained (i.e. post-development) values would either exceed the default BRE recommendations or be considered adequate for a dense urban environment such as the opportunity area by reference to by reference to GLA/London Mayor and Planning Inspectorate decisions.
159. At third floor two windows were assessed, which are understood to serve a proposed kitchen/dining room and a living room. In the existing scenario these would record 35.80%VSC and 37.30%VSC, considered high for a dense urban environment. Post-development, both would retain 21% VSC which is considered very good for a dense urban environment such as the opportunity area. The interim difference may be noticeable to occupants given the high baseline.

No-Sky Line

160. This analysis shows that there would be no noticeable no-sky line differences within the proposed rooms at second floor level. At third floor, there would be no difference in

no-sky line within the proposed living room. In respect of the kitchen/dining room the analysis indicated a slightly noticeable difference, given it records a 25.44% difference. This room would retain 70.08% of its area with a direct view of sky, considered excellent for a dense urban environment.

Average Daylight Factor

161. At second floor both rooms would retain values in excess of the default British Standard recommendation for their assumed use. At third floor, the living room would also retain an ADF value in excess of the default British Standard recommendation. In respect of the adjacent kitchen/dining room, the existing results show that this has a significantly lower ADF results, considered to be mainly due to its much smaller window size when compared to the other proposed rooms. The room would experience a similar reduction to the others adjacent; however this lowered baseline due to the small window size means the room would fall further below the default recommendation post-development. A larger window size, more comparable to the rooms adjacent, should alleviate the lower existing and proposed results.
162. In overall terms, whilst a degree of impact on 57 Glengall Road is inevitable, the various tests outlined above all demonstrate that the residual natural lighting conditions will remain acceptable in all scenarios, and particularly within an urban regeneration context such as this where an efficient use of land is a policy requirement. There will however be noticeable differences, something the BRE would consider unavoidable in these situations. These potential impacts were carefully considered during the design process, as demonstrated by the range of assessments/reporting and level of discussion which has taken place. It is also important to highlight that the lowest retained VSC values, albeit still acceptable in planning terms, relate to a temporary consent which is due to expire in less than a year.

Space Studios, Heymerle Road

163. These units are artists' studios and as such not normally the subject of daylighting analysis. However, recognising that there is the potential for impact, they have been included for assessment. There is no discernable impact to these units either in light available to the windows or in terms of internal distribution.

Conclusion on daylight and sunlight impacts to existing residential units

164. 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.
165. 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.
166. 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 and consistent with all the

neighbours for an urban area. The presence of the proposed tower element does eliminate a relatively large proportion of the available sky, however, its slender nature allows significant levels of daylight to penetrate around it to all the relevant neighbours.

167. In addition, analysis has been undertaken in a cumulative sense for the potential redevelopments adjacent to the application site; the analysis shows that any cumulative issues are not caused by the application site whose impacts are within guidelines where cumulative analysis is required. The application scheme will allow good daylighting to be available to the cumulative schemes and will not hinder the design of these potential schemes.

Overlooking

168. 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.
169. In relation to adjoining sites the proposed scheme is approximately 20 metres away from 66-80 Glengall Road and approximately 46m (southern elevation of the Bianca Road block) minimum of metres away from north elevation of 57 Glengall Road. These degrees of separation when considered with the orientation of the flats are considered to avoid any harmful overlooking.

Outlook

170. It is considered that the proposed development will provide an improved outlook for nearby residential properties as the scheme would enhance the street townscape with a high quality well designed mixed use building. New public realm and wider footways would enhance the existing poor quality of public realm. While the ground floor would be replaced with active frontages that encourage, increased footfall and use of the site. The impact of the proposal on long views and panoramas from Galleria Court is not considered material enough to warrant refusal as these views are not protected.

Air quality

171. 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. The proposed development seeks to achieve these aims by:
- Keeping all workspaces on ground and mezzanine levels;
 - Using passive and mechanical ventilation systems where appropriate;
 - Incorporating “urban greening” in the form of landscaping and planting;
 - Being “car free” and within a restricted parking zone;
 - Using high efficiency condensing boilers; and
 - Providing future connection to the decentralised energy network.
172. 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 with a Construction Management Plan. Such a plan

should provide details of continuous monitoring for dust and noise. It is recommended that this plan be requested by condition.

173. 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.

Conclusion on quality of residential accommodation

174. 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 new open space offsite since it is not possible to provide all of this on site.

Design issues

175. 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.
176. 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.

Height, Scale and Massing

177. The height of the buildings proposed marks a step change in the scale of development in the area, although not as tall as the tower recently approved at Nye's Wharf at circa 18 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 53.5m high within the centre of the site where the proposed building reaches 15 storeys.
178. The form and massing approach is broadly supported by the GLA.
179. 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.

180. 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 stepped residential blocks break up the perception of massing along in longer views and allows for the courtyard to be well naturally lit from the south.
181. The character of the area would not be adversely affected by the scale, mass or bulk of the 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 new homes and more jobs within a mixed use development.
182. In terms of microclimate impacts, the results of the wind assessment for the proposed development indicate that no significant adverse effects are anticipated.

Design Quality

183. 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 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
184. 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.
185. The 'base' of the building, that includes the retained elevational elements and the ground and first floors is defined by a horizontal banding and vertical columns that splits the change in function from commercial use to residential uses above. A double height central corridor provides access to the commercial floorspace and through to the proposed yard. The high floor to floor ceiling heights create legible commercial frontages along the three public facing elevations of the building to Glengall Road, Bianca Road and the new Latona Yard.
186. The 'middle' would feature a clear rhythm of windows and balconies, with predominant vertical columns of red brickwork interlaced with recessed elements to reduce the perceived height and mass of the buildings and accentuate articulation in plan by contrast with the red brick.

187. The 'top' would be expressed with a mix of brick detailing. Lift overruns and rooftop access would be expanded Stainless Steel to promote transparency but appear as new machined additions to the roofscape.

Detailed design, fenestration and materiality

188. A brick and metal cladding language is proposed for the building in response to the character of the surrounding area. This would consist predominantly of red brick and a secondary material of dark grey metal cladding for recessed elements.
189. Openable commercial glazed units, dark grey powder coated crittall style metal frames are proposed for the commercial floors and similar are proposed for the residential floors. The recessed and protruding balconies would be enclosed by metal frames and flashings to the glass balustrades.
190. 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.

Public realm and open space

Glengall Road

191. The footways to Glengall Road would be slightly widened to create a comfortable setting for the proposal and improve the walking environment.

Latona Yard

192. A key aspiration of the OKR AAP is to deliver a series of public working yards within the opportunity area, similar to existing yards elsewhere in Southwark such as Pullens Yard at Elephant and Castle.
193. The Latona Road, Glengall Road, Bianca Road and Heymerle Road block offers an excellent opportunity for a new versatile, creative yard space, and this proposal would deliver a significant proportion, with the remainder being provided by two or more further landowners including, at this time, the council, as adjoining sites came forward for development on the eastern and southern side of the block. The southern entrance to the yard would be delivered on a site owned by the council on Latona Road and Heymerle Road.
194. The proposed yard would provide activity and spill-out space for light industrial and creative workspaces that each building fronting the yard would provide. There is the opportunity for the yard to become a destination for markets and exhibitions. It would also provide a north/south walking link from Bianca Road or the proposed Linear Park to Latona Road once complete to ensure better permeability and encouraging walking within the area and to Burgess Park.

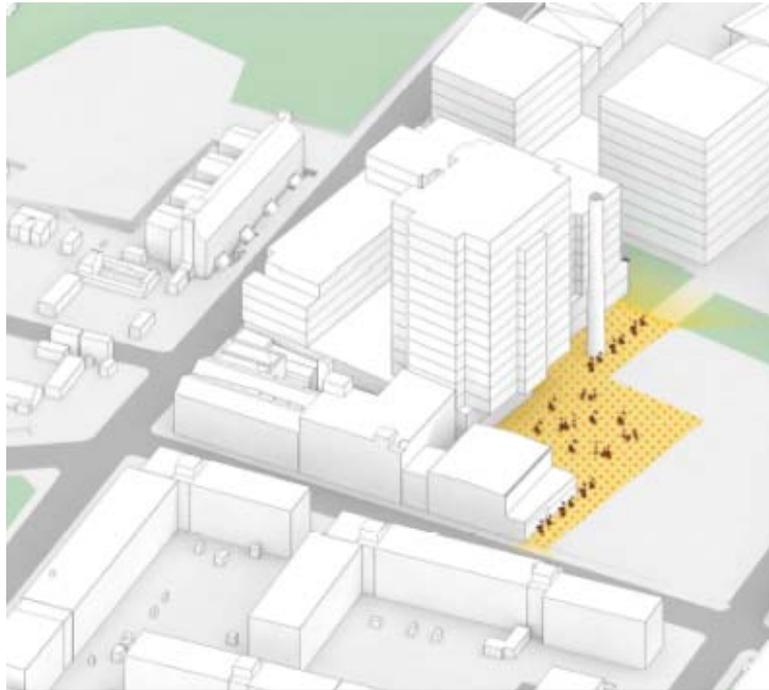


Figure 19. Illustrative image of the proposed route through Latona Yard from Latona Road to Road and to Bianca Road.

195. The retained chimney would provide a unique historical reference point and the yard would well defined on all sides by the elevations of new and existing the buildings to create an intimate and vibrant place. Further options are being explored to either fully or part cover the yard or to keep it open to the elements. Any future options or structures would be agreed with the respective landowners and would likely require further planning permission.



Figure 20. Illustrative image of a completed Latona Yard prepared by Patel Taylor architects. This is one option of for the yard space that is being explored.

196. Further work has also been undertaken to explore the materiality of the Yard, with cobbled paving a likely choice of materials.

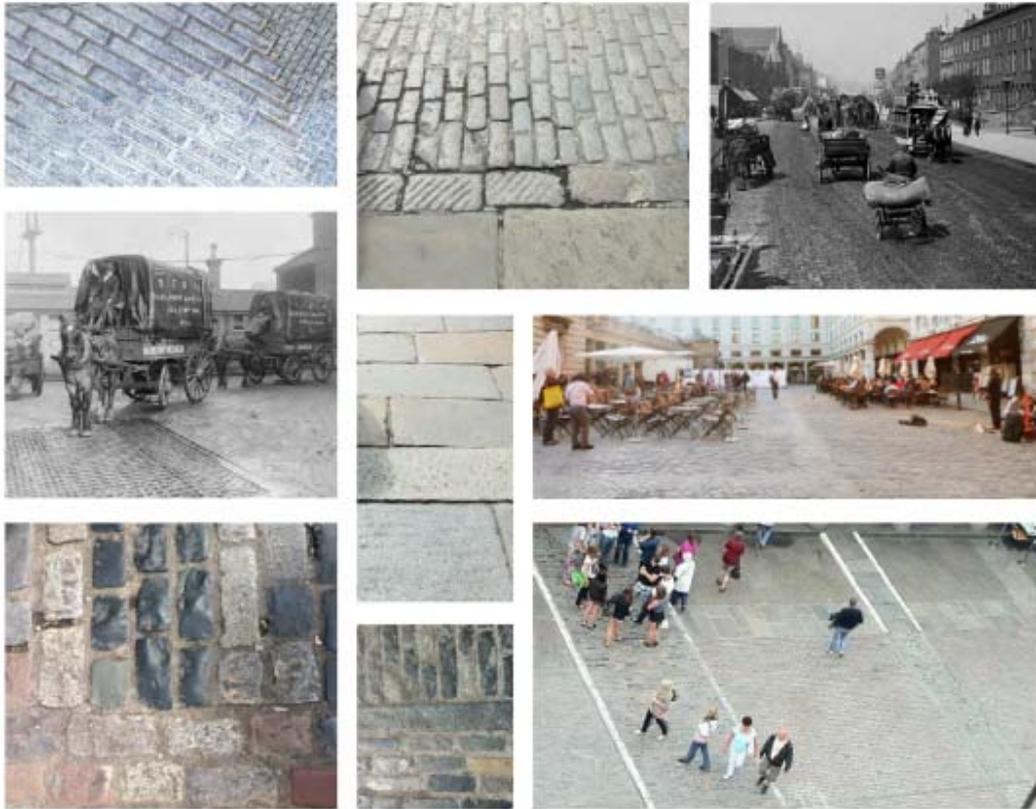


Figure 21: Illustrative materials for the yard.



Figure 22: Illustrative photograph of the type of yard space.



Figure 23. CGI image of the proposed Latona Yard. Detailed design to be conditioned.

197. Detailed design and management of the Latona Yard would be secured by condition and s106 legal agreement through the respective landowners. A joint management board or company would ensure.
198. As noted above, Policy AAP10 of the emerging OKR AAP requires the provision of 5sqm of public open space per dwelling which equates to 908sqm for the scheme. A 851sqm of public open space is proposed in the proposed Latona Yard and access route from Bianca Road. As such, there is a shortfall of 54sqm that cannot be provided on site which will be secured by a financial contribution. Although this policy currently has limited weight, the applicant has agreed to make the contribution of £11,070 based on the 181dwellings proposed (at a cost of £205 per sqm as set out in the section 106 SPD) which could go towards off site delivery of open space such as the proposed linear park or Burgess Park, and can be secured by the legal agreement.

Surrey Canal Linear Park

199. The retained northern elevation of the site would front onto Bianca Road which is currently the proposed location and route for the new Surrey Canal Linear Park that is set out in the draft OKR AAP. The application site would not provide any land for the park as it would be delivered through the conversion of the existing public highway. However, the financial open space contribution secured through s106 could be pooled with adjoining s106 contributions to part-fund the delivery.
200. The retained northern elevation would provide a historic, active frontage with interesting views into the commercial workspace from the park.

Design Review Panel

201. The Design Review Panel's role in planning process is advisory. They reviewed the scheme on 14 May 2018 and provided detailed comments in their report.
202. It should be noted that the scheme has been revised in response to the panel's suggestions and through further discussions with officers.

Open space

203. A concern was raised regarding the scale and quality 'Latona Yard' and the quality of the communal space proposed at roof level and within the internal courtyard.
204. Officer response: Officers note that the proposed Latona Yard space would be constrained and not fully delivered until all the adjoining sites delivering space for the yard came forward. However, the space offered is significant and the leading driver for the delivery of the yard. Officers recognise that the successful delivery of new joined-up public realm within the OKR Opportunity Area will rely on the multiple landowners each providing land and this will take place at different times and should not fall to individual landowners to provide all public realm. Since the DRP report, further work has been undertaken by the council and adjoining landowners regarding the type of place the Yard would be. Figures 19-23 illustrate some of these emerging ideas for a meaningful public yard.
205. In terms of roof terraces, the proposal would provide significant communal amenity and play space on site as required by policy. The large regular shaped roof areas provide the opportunity to deliver a high standard of space with the detailed design of space secured by condition. Natural play will be incorporated into the design of the terraces. Using mostly timber elements, this form of play encourages children to explore and create their own play. Boulders, stepping stones, tree logs and stumps will be dispersed through the landscape, whilst larger lawn areas will enable more informal play space. The first floor communal space is has been reviewed and will now only be used for private amenity space. This does not reduce the level of the communal amenity space to a non-policy compliant level.

Façade retention, security and chimney

206. Whilst the Panel supported the façade retention and chimney in principle, it did not consider that the incorporation of these features had been adequately reconciled with the relationship between the new and existing fabric, that there was potential anti-social-behaviour issues between the retained elevation and residential entrances, and there was insufficient investigation into the relationship between the retained chimney, the new development and the new open space.
207. Officer response: Officers recognise the challenges of historic façade retention in relation to the new building and there are a number of ways to achieve this. It is officers' view that the proposal successfully incorporates the retained elevational features as a result of the consistent materiality and satisfactory relationship within the massing that allows the scheme to also deliver an uplift in workspace and optimises the number of new homes on the site. In relation to security, the Met Police have not objected to the development but would seek to have a planning condition attached where this development must achieve Secured by Design accreditation. This is condition is proposed.

Height and massing

208. Although the panel accepted that the site could accommodate a taller element, the panel were not convinced by the justification for positioning of the tall building in the centre of the block and the potential impact it would have on adjoining sites.
209. Officer response: It is officers' view that the massing and location of the tallest element is appropriate for the site. The tallest element is located within the centre of the wider block and would mark the location of the proposed Latona Yard. The proposal has been amended so that the lower floors of the southern elevation of the tower would not have windows to ensure that the adjoining site at 3-5 Latona Road could be redeveloped.

Architectural design

210. The Panel felt that the proposal to extend the materiality of the existing industrial building to the new buildings was generic and unconvincing and that the quality of this proposal will rely to a large degree on the quality of the detailing so that the quality of design should be embedded into a permission, if granted. The Panel felt that the tower could be a different but complimentary architectural language to the linear blocks.
211. Officer response: There are a number of design options when combining retained features and new build. It is officers' view that this proposal reads successfully as a single development in terms of architectural expression and materiality. The urban block that the site comprises part of would demonstrate a range of industrial-led architectural styles within mixed use typologies, and this scheme would deliver that typology. Officers agree that securing the detailing is important and conditions to achieve this are proposed.

Land-use and legibility

212. The Panel recognised the efforts that had been made to create a coherent proposition for the commercial space at ground floor, but were concerned that this had not been successfully reconciled with the residential development above. There was a lack of clarity regarding the location and character of the commercial and residential entrances, the internal central space would not work operationally, the south facing residential units in the tower would be compromised by future development to the south. Concerns were also raised about the north facing single aspect units.
213. Officer response: It is officers' view that the residential layouts are efficient and the entrances and character of the scheme are legible and well located to ensure the scheme optimises the opportunities on the site, and the proposal does not impinge on adjoining sites to the south coming forward for development or vice versa. The limited number of north facing units are considered acceptable and would enjoy views towards Burgess Park and the proposed linear park once delivered. They would receive good daylight levels.

Conclusion on design

214. The building would be of an appropriate height and scale and accordingly is 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

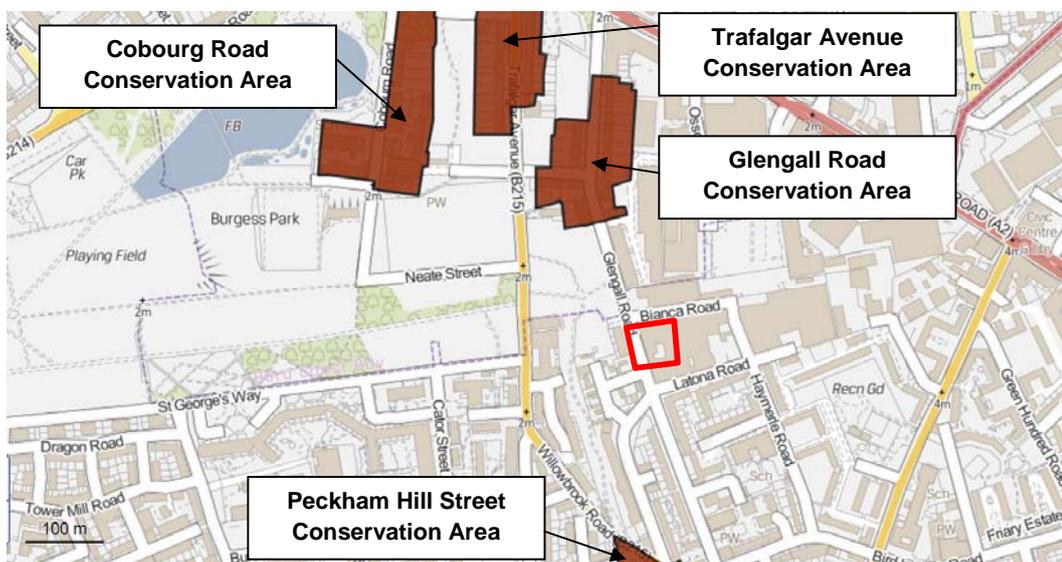
detailed design and material samples.

Heritage

215. Conservation Areas and listed buildings

216. It is important to note that the application site is not located within a Conservation Area.

217. It is recognised that the proposal may have an impact as the application site is located close to following four conservation areas to the north and south of the application site, and an assessment of the potential impact on the setting of these conservation areas is required. The four conservation areas are:



- Glengall Road Conservation Area located to the north and is closest to the application site. It is predominantly experienced in a north/south linear view:



Figure 24. Glengall Road, south facing view



Figure 25. Glengall Terrace, east facing view

- Cobourg Road Conservation Area is located to the north east of the site:



Figure 26. Coburg Road, south facing view

- Trafalgar Avenue Conservation Area located to the north east of the site
- Peckham Hill Street Conservation Area located to the south of the application site.

218. The following Grade II listed buildings are located within the nearby neighbourhood to the application site, but do not adjoin the site:

- 1-9 Glengall Terrace – 190m to north west off Glengall Road
- Listed villas on 5-31 Glengall Road and 24-34 Glengall Road – 190m-320m to north below:



Figure 27. Listed villas on 5-31 Glengall Road and 24-34 Glengall Road

- Celestial church of Christ and attached wall and railings, Glengall Road, is located 180m to the south of the application site below:



Figure 28. Celestial Church of Christ

- New Peckham mosque (former church of St Mark), Cobourg Road, is located 330m to the north west across Burgess Park below:



Figure 29. New Peckham mosque (former church of St Mark)

219. The existing industrial building fronting Bianca Road and the industrial chimney on the application site have been identified as a 'Building or features of townscape merit' and is considered worthy of retention.



Figure 30: View of northern and western elevations and chimney of application site to be retained fronting Bianca Road.

220. In relation to the impact on Conservation Areas, officers have received a representation from Historic England that states that the proposed 15 storey tower would break the picturesque skyline comprising of the Cobourg Primary School and Georgian and Victorian houses that make up the Cobourg Road Conservation Area. This is illustrated in Figure 31 below.
221. Historic England notes that whilst this impact would be relatively modest when compared to other emerging schemes in the wider area, they conclude that this impact would cause 'some harm' to the setting of the Conservation Area and its component listed buildings.



Figure 31. View from Burgess Park across the Cobourg Road Conservation Area.

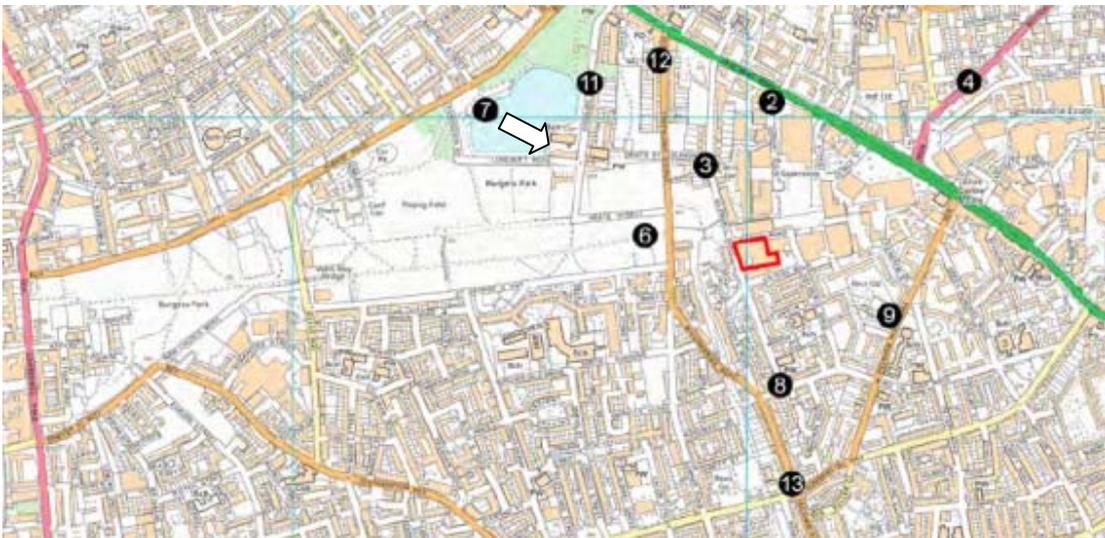


Figure 32: Map of tested viewpoints in Townscape Visual Impact Assessment closest to the application site. Viewpoint 7 is the viewpoint in Figure 31 above.

222. Paragraph 190 of the NPPF requires Local Planning Authorities to identify the architectural or historic significance of a designated heritage asset and to record the effect of any proposal on that architectural or historic significance.
223. Any harm should require clear and convincing justification and can arise from the loss of historic fabric or features of significance as well as impact on the setting of a

heritage asset. In accordance with paragraph 194 of the NPPF, both 'substantial' or 'less than substantial', any harm should be avoided and should be exceptional in the case of Grade II listed buildings and wholly exceptional in the case assets of highest significance.

224. Paragraphs 195 and 196 of the NPPF also require Local Planning Authorities to weigh any that harm against the public benefits of the development proposed, including securing the optimal viable use of the heritage asset.
225. Officers have also received a late objection from the Southwark Conservation Areas Advisory Group (CAAG) regarding this application. The representation stated that the proposal would overwhelm the scale of the Glengall Road Conservation Area by means of its height and density.
226. It is officers' view that the introduction of this proposal would either cause no or less than substantial harm to the significance of the conservation areas and listed buildings and their urban settings, and this would not warrant refusal of the application. In the longer views, the proposed building will appear layered behind the historic foreground. The tower is of an appropriate mid-height scale so as not to appear overly dominant or harmful. Any harm to a heritage asset should be avoided but the NPPF outlines in paragraph 196 that any harm should be weighed against the public benefits of the proposal including securing an optimal viable use. In this case it is considered that that limited harm caused by the proposed development is outweighed by the public benefits of the development including the new Latona Yard.
227. GLA officers consider that the proposed buildings do not harm the setting of the neighbouring heritage assets.

Loss of historic fabric

228. The representation from CAAG also objected to the loss of the existing industrial buildings, particularly the internal fabric, but acknowledged the retention of the chimney and the northern and western facades.
229. In response, the site is not listed or subject to an article 4 designation that would provide further protection from demolition. As such, the existing buildings have limited value and their retention of the internal layouts would not provide an opportunity for the significant regeneration benefits the scheme would provide. The height and the massing of the proposal has been reduced through negotiation to better reveal the chimney and the retention of the facades, as required by officers, would successfully reference the former use of the site alongside the retained and enhanced industrial uses on site. The loss of the majority of these non-designated industrial buildings is therefore considered acceptable in this instance.

Views

Draft Borough View: St Paul's Cathedral from Nunhead cemetery

230. The draft borough view of St Paul's Cathedral from Nunhead cemetery is a linear view that provides a tight, focussed view of St Paul's Cathedral from one of Southwark's most historic locations. The view is fully-framed by a 'window' of mature trees. St Paul's Cathedral is set prominently in the centre of the view. The lantern, dome, drum

and peristyle are all clearly visible, alongside the Western front and towers. Guy's Cancer Centre sits adjacent to the Drum of the Cathedral in the mid ground.

231. The immediate foreground of the view consists of the mature wooded area of the Cemetery. The view extends northward to the lower residential and industrial areas of the Old Kent Road, where the industrial chimney at Latona Road provides a distinct landmark. Beyond is the predominantly low rise area of Borough and Bankside.
232. This draft borough view is currently unadopted and its designation can only be given limited weight. However, the applicant has positively responded to its draft designation by reducing the proposed height of the building to beneath the threshold plane. The view will be taken forward to examination within the New Southwark Plan.

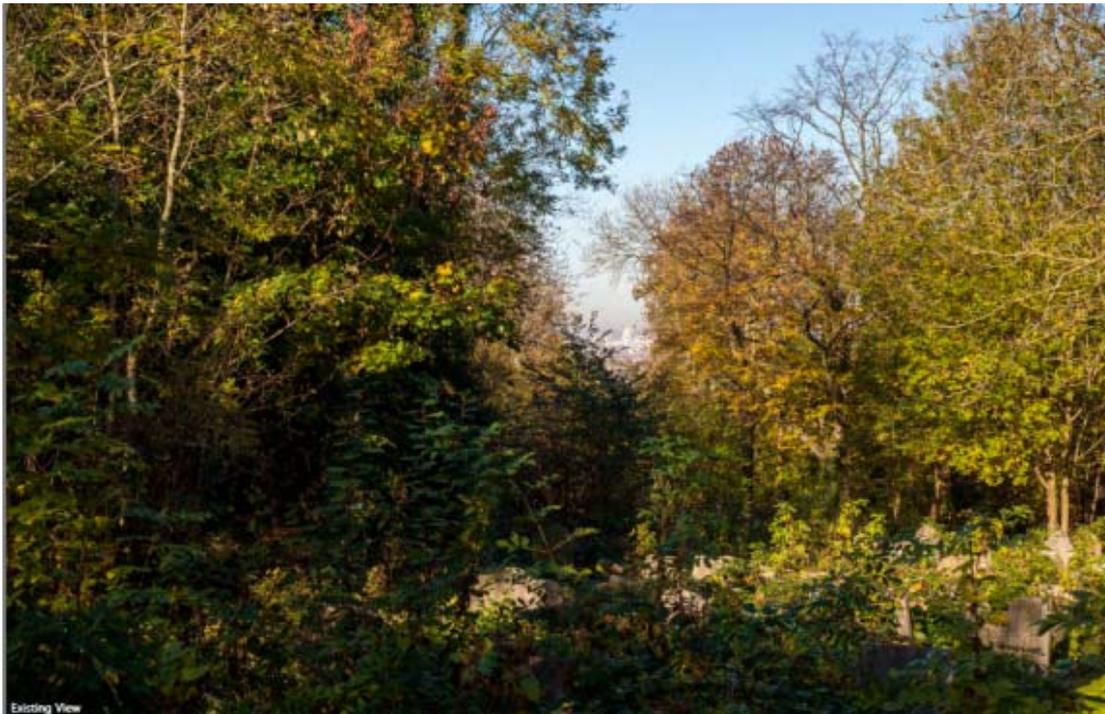


Figure 3.: Existing view from Nunhead Cemetery



Figure 34. Existing view with proposed development located beneath the threshold plane of the proposed landmark viewing corridor.

233. Historic England have made a representation regarding the potential impact of the proposed development on this view and note that, at a maximum of 15 storeys, the proposal would not appear to have the same wide-ranging setting implications on the historic environment as other emerging schemes that are taller than this scheme.
234. However, Historic England contend that the visual impact of the proposed development in the draft borough view from Nunhead Cemetery is concerning as, while the proposed development would not appear to block the view of St Paul's Cathedral, much of the middle ground of the view – the area of Southwark between the Cathedral and Nunhead - would be obscured, including the 'landmark' industrial chimney on the application site.
235. In light of this blocked middle ground, Historic England contend that this would reduce the viewer's ability to appreciate the Cathedral's landmark status within a wider London context from the viewpoint and in their opinion, cause harm to the setting of St Paul's Cathedral. This would be exacerbated by the bulk, massing, and tonality of the proposed development.
236. Historic England also highlighted the advice set out in Annex 4: Borough Views of the Proposed Submission of the New Southwark Plan, that states that "new development proposals should form attractive features in their own right, (and that) development in the foreground and middle ground that is overly intrusive, unsightly or prominent, to the detriment of the view as a whole, will likely be refused" (p14).
237. Officers are of the view that although the proposed scheme would be a well designed,

if prominent feature located within a central position in the middle ground of the draft borough view, it would not cause significant harm setting of the Cathedral or limit the ability of the viewer to appreciate the landmark status of the Cathedral and its position in a London-wide setting, to an extent that warrants refusal of the application.

238. The threshold plane of the draft view is clearly not breached by the proposed scheme and the Cathedral is clearly recognisable within a London-wide setting. As such the impact of the proposal to the middle ground of the view is the primary concern, and Officers are of the view that the proposal would result in less than substantial harm to the setting of St Paul's Cathedral, however in line with the NPPF this is outweighed by the regeneration benefits of the scheme. The 'landmark' industrial chimney would still be visible from the viewpoint.
239. It is for members to balance these different planning impacts and benefits in making their decision.

London View Management Framework views

240. Although the proposal is considered a tall building, it is not considered that this proposal would result in any harm to designated London wide protected views as the proposal does not fall within a background assessment area.

Trees and biodiversity

Trees

241. Saved policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
242. A condition is recommended requiring details of the proposed tree planting in the public realm to be submitted to and approved by the Local Planning Authority at a later time to replace the loss of two street trees. However, whether tree planting will in fact be feasible as part of the future highways works in this location will be dependent on the Section 278 works, which are agreed and entered into between the applicant and the Highways department as part as an entirely separate process to this planning application. There is, therefore, a possibility that the Highways Authority may decide against the incorporation of street trees on the Glengall Road footway.

Landscaping

243. The landscaping of the outdoor communal amenity spaces with planting and trees is only shown indicatively in the proposed Landscaping Statement. As such, a condition requiring hard and soft landscaping plans to be submitted to and approved by the Local Planning Authority at a later time is recommended.

Biodiversity

244. The habitats to be lost as a result of the proposed development (buildings and hardstanding) are of negligible ecological importance and no specific mitigation is required. New landscaping is proposed to be secured by condition. The Council's Ecologist has recommended a condition for boxes for Sparrow, Swifts and general birds to be included.

Transport and highway matters, including cycle and refuse storage

245. Saved Policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions. Saved Policy 5.3 requires the needs of pedestrians and cyclists to be considered. Saved Policy 5.6 establishes maximum parking standards. The site has a PTAL (public transport accessibility level) of 3 (poor), although there is a relatively good bus service available. The council's Transport Planning and Highways teams have been consulted. Their responses have informed the following paragraphs of this Committee Report.

Walking

246. The proposal has considered pedestrian and cycle connectivity, as well as permeability in relation to the emerging developments at nearby sites. The proposal includes multiple convenient pedestrian access points into the development. In addition the proposal includes a new public yard space that will enable new links to be created within the block, linking Latona Road and Bianca Road when future developments come forward on adjoining sites.
247. The nearest bus stops are located between 250m and 450m to the north-west of the site on Trafalgar Avenue (B215) and the Old Kent Road (A2). These services and their proximity to the site will encourage residents to adopt sustainable modes of travel.

Cycling and cycle parking

248. Three year membership to dockless cycle hire or a 'Brompton Locker' scheme with a lockers delivered to a minimum of 10% of the total units numbers (18 lockers) will be available to all future residents, and will be secured through the Section 106 Agreement. This will offer residents access to cycling without requiring them to own a bike.
249. The proposal includes four cycle stores at ground floor level for residential and commercial use. The residential stores would be located adjacent to the lift of each core and from the central corridor. The indicative details of these stores show that 311 residential spaces (which is compliant with the London Plan standards) could be provided in a stacked format. A store accommodating a further 32 cycle spaces would be provided at ground floor level for the exclusive use of the commercial staff. The Council's Transport Team considers that there may be scope for a more flexible storage format, to allow for the storage of bulkier items as well as prams and, as such, the detailed design of the storage is to be reserved by condition.

Car parking

250. The proposal is to be car free with the exception of on-street provision for two disabled bays. No on site disabled bays have been proposed. LBS do not allocate kerbside to disabled parking however if a future resident of a wheelchair unit has a blue badge they can apply for on street disabled parking. Although not ideal, this has been acceptable in other developments.
251. Through a clause in the Section 106 Agreement, all new residents will be exempted from parking permit eligibility.

252. Future residents will be granted 3-year membership of a car club, which will be secured through the Section 106 Agreement.

Trip generation

253. 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. This analysis demonstrated that circa 91 two-way vehicle trips per day would result from the proposed development.

Servicing and DSP bond

254. The Council's Transport Planning Team considers that the Glengall Road bays would adequately accommodate the needs of this development such that there would be no detrimental highway impact. Notwithstanding this, as a precautionary measure to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the applicant has agreed to enter into a Delivery Service Plan Bond (DSP Bond) against their baseline figures for daily servicing and delivery trips. This approach has been adopted on all other sites of a similar scale across the Old Kent AAP area. These bonds are calculated on the basis of £100 per residential unit, plus £100 per 500 square metres or part thereof of 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.

255. The DSP Bond is entered into with the council against the applicant's own baseline of daily trips for the servicing and delivery of the development. It is based on the daily vehicular activity of the site (both commercial and residential), quarterly for a period of 2 years. The monitoring period commences once the development reaches 75% occupancy. If the site meets or betters its own baseline target, the monies 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 reinvested by the council in sustainable transport projects in the ward of the development. The council will retain £1,600 for assessing the quarterly monitoring.

256. For the proposed development, the DSP Bond sum breaks down as follows:

Type of floorspace and chargeable rate	Quantity	Sum
Residential (£100 per unit)	181	£18,100
Non-residential floorspace (£100 per 500 square metres or part thereof)	3855	£771
Total (of which £1600 is non-refundable)		£18,871
Daily servicing/delivery motorised vehicles baseline	91	N/A

257. This mechanism, to be secured through Section 106 Agreement, would ensure the servicing activity associated with the development can be monitored and any impact to the highway network can be mitigated in the unlikely event that such impact arises.

Construction management

258. 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.

Waste storage and collection arrangements

259. Refuse stores associated with the residential component of the development are to be provided at ground floor level close to the residential cores. These stores would have double-doors opening directly onto the building frontage to enable kerbside collection on Glengall Road. A separate refuse store is provided for the commercial uses within the central corridor with quick access to Glengall Road. All stores would be of an adequate size to accommodate the anticipated volumes of residual waste and recycling that the residential and commercial components would generate. As the stores have been located close to the residential stores, they would be managed to ensure bins are collected directly from the stores and wheeled to the vehicles on Glengall Road. The arrangements are, therefore, considered acceptable.

Environmental matters

Land contamination

260. The application was accompanied by a preliminary Land Contamination Risk Assessment, which the Council's Environmental Protection Team has assessed and deemed acceptable. A condition is to be imposed requiring a Phase 2 investigation to be conducted and the results submitted to the Council for approval, with further remediation measures to apply if contamination is found to be present.

Flood risk, flood resilience and sustainable urban drainage

261. The site is located within Flood Zone 1 on the Environment Agency's Flood Map for Planning, which consists of land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). The site is assessed to be at low risk from groundwater flooding, and the site has a low to negligible risk of flooding from all other sources. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable, subject to standard conditions. The council's flood team have requested further detail including a drainage strategy to be secured by condition to meet climate change allocation for site drainage for the 100 year design life has been set at 40%.

Archaeology

262. The site is not currently in an Archaeological Priority Area (APA) but will be when the New Southwark Plan is adopted.
263. The applicants have submitted a desk based assessment (DBA) with this application

by BRB and dated February 2018. The DBA shows that the site was undeveloped until the late 19th century when extensive development was undertaken in the form of a mix of low-rise light industrial and manufacturing units, which now cover the site. The results of nearby archaeological investigations show that there is potential for archaeological remains, particularly of prehistoric and Roman date to exist within the site. As such, the Archaeologist has recommended the imposition of five conditions should planning permission be granted.

Energy and sustainability

Carbon emissions and renewable technologies

264. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 40% reduction against Part L of the Building Regulations. An Energy Statement and Sustainability Assessment based on the Mayor's hierarchy have been submitted.
265. The Energy Statement demonstrates how the targets for carbon dioxide emissions reduction are to be met. Reductions in emissions for the site have been demonstrated via 'Lean', 'Clean', 'Green' measures, in line with the GLA guidance on preparing energy statements, the Southwark Core Strategy (2011) and the Southwark Sustainable Design and Construction SPD.
266. Overall, the Energy Assessment asserts that the development would achieve a carbon saving of 45%. This has been achieved by proposing:
- 'Lean' measures such as energy efficiency measures included in the strategy are high efficiency glazing and energy efficient lighting utilizing LED lamp technology, and reduced air permeability rate.
 - 'Clean' measures such as provision for the connection to a future district heating system has been provided within the scheme;
 - 'Green' measures such as photovoltaic panels
267. As such, a financial contribution is required for the required shortfall as follows:
268. Residential: This is based on the overall carbon emission for the new residential development being 16.4kgCO₂/m²/annum. The proposed low energy and renewable technologies result in an overall reduction in CO₂ emissions of 54% equating to an overall predicted Carbon emission is 122,050 kg CO₂. The residential component of the development must achieve zero carbon i.e.100%. Therefore the assessed Carbon Offset Fund contribution for the residential component, based on 122,050 tonnes CO₂ (100%) at £1,800 per tonne, is £219,700.
269. Non-Residential: The overall carbon emission has been assessed for new non-residential component of the development to be 15.8kgCO₂/m²/annum. The low energy and renewable technologies proposed would result in an overall reduction in CO₂ emissions of 20%. The overall predicted Carbon emission is 55,030 kg CO₂. In terms of the Carbon Offset Fund calculation, the non-Residential component of the

Development needs to achieve a 40% reduction against Part L, which would result in a total carbon emission of 40,960 kgCO₂. Therefore the difference of 14,070 kgCO₂ is the basis for assessing the Carbon Offset Fund contribution for the non-residential. This equates to 14.0 tonnes CO₂, which at £1,800 per tonne, provides a Carbon Offset Fund contribution for the non-Residential component of the Development of £25,328.

270. The overall Carbon Offset Fund contribution for the overall development for both the residential, and non-residential, is £245,028 over the 30 year period.

BREEAM

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

Air Quality

272. The submitted Air Quality Assessment considers the impacts that the proposed development would have both during construction and post-completion. The proposed development has been shown to be air quality neutral with regard to buildings. During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be 'not significant', as confirmed by the council's EPT officer.

Development viability

273. This application was accompanied by a viability report on submission. Following discussions, the application was amended to confirm that the proposed affordable rented units would be 'social rent' tenure and that the affordable housing offer was 35% with a 70%/30% social rent/intermediate split to be secured through s106.. The applicant has committed to achieving 35% affordable housing by habitable room for three reasons:

- The applicant is taking a view that the proposed development will outperform present day market assumptions;
- The applicant is intending to be the end operator of the proposed workspaces which will provide long-term income to off-set some of the viability issues; and
- The applicant is looking to develop a number of sites within Southwark and the old Kent Road area, with this scheme being an initial flagship project, and so is willing to accept a reduced level of profit to ensure its success as an exemplar scheme.

Community engagement

274. The applicant's statement of community involvement details the consultation undertaken before the full application was submitted. These community engagement efforts included:

- The pre-application consultation and promotion methods used were:

- A letter delivered to approximately 1,800 homes;
 - Emails to political representatives;
 - A two day public consultation exhibition on two consecutive weekdays;
 - A consultation feedback form handed out at the exhibition events;
 - A dedicated telephone number and email address for further enquiries.
275. The applicant has also met local businesses to understand local demand and type and of commercial fit out.
276. Notwithstanding that there are no statutory requirements in relation to Community Involvement, this is considered to be an adequate effort to engage with those affected by the proposals. As part of its statutory requirements, The Local Planning Authority, sent letters to all residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. The responses received are summarised later in this report.

Planning obligations and Community Infrastructure Levy

Mayoral and Southwark CIL

277. 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.
278. The Mayoral and Southwark Community Infrastructure Levies are to be confirmed in the addendum to this report as the ground floor of the scheme has recently been revised to provide an uplift in commercial floorspace. The figures will be pre-relief and subject to indexation. The draft liability notice will be attached to the Decision Notice.

Section 106

279. Saved Policy 2.5 'Planning Obligations' advises that planning obligations should be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 is reinforced by the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD, which sets out in detail the type of development that qualifies for planning obligations.
280. In accordance with Southwark's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD, the following contributions have been agreed with the applicant, in order to mitigate the impacts of the development:

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
<p>LOCAL ECONOMY: CONSTRUCTION PHASE JOB/CONTRIBUTIONS</p>	<p>The maximum Employment and Training Contribution is £203,400(£180,600 against sustained jobs, £6300 against short courses, and £16,500 against construction industry apprenticeships)</p> <p>This development would be expected to deliver 42 sustained jobs to unemployed Southwark residents, 42 short courses, and take on 11 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.</p>	To be agreed
<p>LOCAL ECONOMY: CONSTRUCTION PHASE EMPLOYMENT, SKILLS AND BUSINESS SUPPORT PLAN</p>	<p>The Plan would be expected to detail:</p> <ul style="list-style-type: none"> • Methodology of training, skills, support etc. • Targets for construction skills and employment outputs • Methodology for delivering apprenticeships • Local supply chain activity methodology 	Agreed
<p>AFFORDABLE WORKSPACE</p>	<p>10% of the total commercial floorspace is to be for affordable workspace at a rate of £12 per square foot over a 15-year period.</p>	Agreed
<p>COMMERCIAL UNITS MANAGEMENT PLAN</p>	<p>Strategy to be submitted to and approved by the Council setting out:</p> <ul style="list-style-type: none"> • how a Specialist Workspace Provider will be appointed; • the methodology for supporting SMEs; • the marketing strategy, and; • the strategy for managing the units. 	To be agreed

Housing, Viability and Amenity Space		
AFFORDABLE (SOCIAL RENT AND INTERMEDIATE) HOUSING PROVISION	<p>Provision and retention in perpetuity (except where viability is reviewed) of 61 affordable units on the site, comprising the following mix:</p> <ul style="list-style-type: none"> • 40 units (7 x one-bedroom flats, 22 x two-bedroom flats, 11 x three-bedroom flats) to be social rent tenure • 21 units (10 x one-bedroom flats, 9 x two-bedroom flats, 2 x three-bedroom units) to be intermediate shared ownership tenure units. <p>The payment of £8,073 towards the costs of an Affordable Housing monitoring.</p>	Agreed
VIABILITY	<p>Viability Review Update to be submitted should the agreed affordable housing offer not be complied with.</p> <p>Standard paragraphs pertaining to validation of the Viability Review Update and its subsequent review: (receipt of Review Update within 10 days; provision of additional info within 10 days; Review to be carried out by external agents on behalf of the council, with costs to be met by the developer; confirmation to be given by Council within 3 months; referral to specialist if Update not accepted etc.)</p> <p>Provisions in respect of the payment of the Deferred Affordable Housing Payment, the expiry of the Viability Review Update, and the Viability Actual Value Review.</p> <p>Restriction on occupation of 50% if a Viability Review Update is</p>	Agreed

	required.	
WHEELCHAIR HOUSING PROVISION	<p>Provision of 18 housing units as wheelchair housing units.</p> <p>Suitable marketing of the Housing Units designated as Wheelchair Accessible Units for the duration of the Marketing Period for Wheelchair Accessible Dwellings where applicable.</p> <p>No disposal of any of the Intermediate Housing Units designated as a Wheelchair Accessible Unit to those not in need of wheelchair housing until marketing exercise at end of marketing period.</p>	Agreed
OUTDOOR AMENITY SPACE	<p>Not to occupy the development or any part of it until the communal amenity space has been completed to satisfaction of Council.</p> <p>To maintain the communal amenity space and provide residents with free access to it throughout the year for the duration of the development.</p>	Agreed
PUBLIC OPEN SPACE	<p>Payment of £11,070 (indexed) to secure improvements to existing parks and open spaces within the Old Kent Road Opportunity Area. This figure is the remainder required following the delivery of the Latona Yard public space.</p>	Agreed
Transport and Highways		
HIGHWAY WORKS	<p>Prior to implementation, the Developer is to submit for approval the s278 specification and estimated costs.</p> <p>Prior to commencement of highway works, the Developer is to enter into a Highway Agreement for the purposes authorising the works etc.</p> <p>The works, as listed below, are to be completed in accordance with</p>	To be agreed

	<p>the Highway agreement:</p> <ul style="list-style-type: none"> • Repave the footway including new kerbing fronting the development on Glengall Road and Bianca Road using materials in accordance with Southwark's Streetscape Design Manual. • Construct an inset bay using materials in accordance with Southwark's Streetscape Design Manual. • Provide access arrangements for refuse collection such as a dropped kerb construction to SSDM standards. 	
<p>DELIVERY SERVICE PLAN BOND</p>	<p>For a period of two years from 75% occupancy the daily vehicular activity of the site (for both the commercial and residential elements of the development) are to be monitored and returns made on a quarterly basis. 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.</p> <p>The Delivery Service Plan Bond will be £18,871, which breaks down as follows:</p> <ul style="list-style-type: none"> • Resi units (£100/unit): £18100 • Non-resi floorspace (£100 per each 500 square metres or part thereof): £771 	<p>Agreed</p>

	<p>The Bond is to be paid to the Council prior to occupation of any part of the development.</p> <p>The council will retain £1,600 of the £18,871 Bond for assessing the quarterly monitoring.</p>	
CYCLE CLUB SCHEME	<p>Membership of a dockless cycle hire scheme licenced by the highway authority or 'Brompton lockers' hire scheme for 10% of total units, for a period of 3 years from the date of first occupation will be available for free to all residents.</p>	Agreed
CAR CLUB SCHEME	<p>Membership of a Car Club Operator scheme (to be one of the Council's approved car club partners) for a period of 3 years from the date of first occupation will be available to all eligible residents.</p>	Agreed
PARKING PERMIT RESTRICTION	<p>All future residents, with the exception of blue badge holders, are to be exempted from parking permit eligibility in local Controlled Parking Zones.</p>	To be agreed
Energy, Sustainability and the Environment		
FUTUREPROOFING FOR CONNECTION TO DISTRICT CHP	<p>Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.</p>	Agreed
CARBON OFFSET FUND	<p>Payment on or before implementation of £245,028 (indexed) based on the shortfall tonnes of carbon per year over a 30 year period, which breaks down as follows:</p> <ul style="list-style-type: none"> • Resi element: £219,700 • Non-domestic element: £25,328. <p>Development as built is to achieve a 54% carbon reduction for the residential element and 20%% carbon reduction for the non-residential element.</p>	Agreed

ARCHAEOLOGY	Payment of £11,171 (indexed) to cover the costs of archaeology monitoring/supervising.	Agreed
Transport for London		
CYCLE HIRE SCHEME CONTRIBUTION	£36,200	Not agreed
BUS CONTRIBUTION	To be confirmed	Not agreed
HEALTHY STREETS	£181,000	Funded through CIL
LEGIBLE LONDON SIGNS X 2	£12,000	Funded through CIL
Administration fee	Payment to cover the costs of monitoring these necessary planning obligations calculated as 2% of total sum.	Agreed
Indicative total	£497,613	

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

- Latona Yard Management Plan and access arrangements
- Ancillary flexible community space management and access arrangements
- Affordable housing provisions
- Wheelchair housing provisions
- Appointment of workspace co-ordinator
- Affordable workspace – 10% of floorspace – Location to be agreed

282. These obligations are necessary to make the development acceptable in planning terms, mitigating for its adverse impacts. In the event that a satisfactory legal agreement has not been entered into by 14 June 2019 it is recommended that the director of planning refuses planning 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).

Consultation responses: Members of the public

283. 22 representations were received in respect of this planning application, of which 20 were in objection and 2 in support. In summary, the material planning considerations raised by these representations are as follows:

Support

- 284.
- Mixed use development is necessary and worthwhile
 - The height of the proposed buildings are fine

Objections

Prematurity

285. • OKR AAP still in consultation phase and the application is premature
Officer response: This is addressed in the main body of the report.

Commercial floorspace

286. • Loss of industrial floorspace
 • Poor quality commercial floorspace
Officer response: The scheme has been revised to ensure a net gain of commercial floorspace. A condition will secure a minimum of B1(c) fit out for the B1(c) and B2/B8 floorspace. Improved commercial lifts are also now proposed.

Community/affordability

287. • The proposed homes would be unaffordable;
 • No benefit to community.
Officer response: The scheme will provide 181 new homes with 61 affordable homes, new jobs and public open spaces for new and existing residents.

Amenity

288. • Loss of light to existing residents;
 • Sense of enclosure;
 • Loss of amenity;
 • Potential overlooking;
 • Loss of view from existing flats.
Officer response: It is noted that the proposal will have an impact on the amenity of some existing residents. However, it is considered that the impacts would not cause a degree of harm that would warrant refusal of the application.

Design and heritage

289. • Excessive building heights are proposed;
 • Inappropriate density;
 • Impact on local services;
 • Poor design;
 • Loss of historic buildings and impact on conservation areas;
 • Under sized residential units.
Officer response: The scheme is dense, but secures exemplary residential design and regeneration benefits. The heights are considered acceptable within the opportunity area and optimise the site while delivering public benefits. Residential layouts are good and unit sizes meet and in places exceed space standards. The scheme seeks to retain elevations of the existing non-listed industrial buildings which is seen a positive outcome.

Transport

290.
 - Negative local transport impacts;
 - The negative impact on transport as a result of construction.Officer response: Transport impacts will be mitigated through improved services funded by financial contributions and through construction management plans secured by condition.

Consultation responses: Internal and external consultees

291. Set out below are the responses received from external consultees in respect of this planning application. The views of internal consultees are summarised within the main body of this Committee Report. Appendix 1 provides further details.

London Fire and Emergency Planning Authority

292. No objection.

Environment Agency

293. No objection subject to suggested conditions.

Historic England

294. As discussed in main report.

London Underground

295. No comment.

Thames Water

296. No concerns following further detail being provided by the applicant to Thames Water.

Transport for London

297. Concerns raised regarding the pedestrian environment fronting Glengall Road and Bianca Road.

298. Officer Response: The council agrees that the footways should be as wide as feasible taking into account the retention of historic features.

299. The proposed cycle parking is substandard.

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

301. A financial contribution for cycle hire was requested.

302. 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.

303. Financial contributions for highways infrastructure was requested for Healthy Streets and Legible London signage.
304. 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.
305. Detailed Construction Traffic Management Plan (CTMP) and Delivery and Servicing Management Plans are required by condition
306. Officer response: Agreed.
307. Car-free development supported. No disabled parking onsite or expansion.
308. Officer response: Due to site constraints and wider regeneration benefits of new open space and other policy requirements this is not possible.
309. A financial contribution of £1,095,000 has been requested for improvements to bus services.
310. 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.

Natural England

311. No comment.

Metropolitan Police

312. No objections. This consultee requested that Secured by Design accreditation be required by conditions.

GLA

313. 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.

314. 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.
315. 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.
316. Following revisions to the design of the proposal, it is considered that a condition securing B1(c) and B2/B8 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 and the required floorspace mix.
317. 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.
318. Officer Response: The proposed offer of 35% 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).
319. 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.
320. Officer Response: The applicant is confirming the commercial carbon emission figures. A financial contribution is proposed to offset any shortfall.

321. The GLA requested a Servicing and Delivery Plan.
322. Officer Response: This would be secured by condition.
323. GLA officers raised concerns regarding the level of daylight penetration into main living spaces of the units on the northern frontage of the lower block and the location of a residential core accessed only from the proposed courtyard, and the nature of the courtyard with little natural surveillance, gives rise to concerns over personal security.
324. Officer Response: The scheme has good levels of daylight with only 2 of 181 units receiving daylight below BRE standards. The GLA has specifically mentioned "the level of daylight penetration into main living spaces of the units on the northern frontage of the lower block. Using the detailed figures at Appendix V of the daylight/sunlight assessment, these are shown as rooms R7/202-207, R8/206-207, R9/202 -205, R10/202-207, R11/202-207, R12/202-205 and R13/202-205 - all of which comprise Living Diners, Bedrooms or Living Kitchen Diners. As demonstrated in the assessment tables, all of these rooms achieve well above the BRE guidance (1% for bedrooms; 1.5% for living diners and 2% for living kitchen diners). The Met Police have not objected to the scheme, subject to condition to secure secured by design.
325. The development should be car free in line with the draft London Plan and emerging OKR AAP and Blue Badge Parking does not meet London Plan targets. 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.
326. Officer Response: Relevant conditions and S106 agreement proposed. It is not considered feasible to provide parking on site in light of the requirement to reprovide commercial floorspace and new public open space.
327. 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.
328. Officer Response: Cycle parking design will be secured by condition. Further amendments to the internal layout have been secured.
329. **Community impact statement / Equalities Assessment**
330. 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 connected to that characteristic

- Take steps to meet 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
- c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
331. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
332. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
333. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. It is not considered that this proposal would give rise to any equalities issues in respect of persons sharing the relevant characteristics set out above.
- 334. Human rights implications**
335. 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.
336. This application has the legitimate aim of providing a mixed use (Classes B1 and C3) redevelopment of an existing but vacant commercial (Class B1) building. 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.

Conclusion

337. The proposed development would deliver new high-quality and flexible B1(c) and B2/B8 class floorspace representing uplift on the existing quantum, in so doing increasing the number of jobs for local people, and would include an affordable element. Although the proposal would also introduce residential floorspace within the SPIL, thereby representing a departure from the adopted development plan, the draft New Southwark Plan and Old Kent Road Area Action Plan provide an indication of the direction of travel for planning policy in this location, including an intention to release this site from its SPIL designation. This emerging policy content also set outs a vision for developing mixed-use neighbourhoods and delivering significant levels of new housing.
338. The proposal would deliver 181 new units that would meet the exemplary residential design standards adopted by the council. The provision of affordable housing, measured at 35% of habitable rooms would be policy compliant and is a positive aspect of the proposals. 61 new affordable homes are proposed.

339. The introduction of this proposal would either cause no or less than substantial harm to the significance of the conservation areas, listed buildings and their urban settings and would not warrant refusal of the application. The proposal would be visible in the midground of the draft borough view of St Paul's Cathedral from Nunhead Cemetery, but would not obscure the view of the Cathedral itself. It is considered that that limited harm caused by the proposed development is outweighed by the public benefits of the development including new homes, jobs and the new Latona Yard.
340. 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 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. Conditions are also recommended to ensure the future occupiers of the proposed residential units are protected against undue noise disturbance from the nearby existing and proposed commercial premises, the double benefit of which is that the continued successful functioning of these businesses will be safeguarded.
341. The height and massing of the proposed buildings 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.
342. The trip generation, servicing and refuse arrangements are all acceptable, while detailed cycle storage design and construction management impacts will be resolved at the conditions stage.
343. Other conditions are imposed in respect of matters such as archaeology, ecology and energy. Additionally, mitigation will be sought through a Section 106 Agreement, the terms of which have been agreed with the developer, and upon the successful resolution of which planning permission will be dependent.
344. In line with the requirements of the NPPF, the Council has applied the presumption in favour of sustainable development. The proposed development would accord with sustainable principles and would make efficient use of the land to deliver a high quality development that is in accordance with the Council's aspirations for the area. It is therefore recommended that Members grant permission, subject to conditions as set out in the attached draft decision notice and the applicant entering into a Section 106 agreement.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2364-A	Place and Wellbeing Department	Planning enquiries telephone: 020 7525 5403
Application file: 17/AP/4612	160 Tooley Street	Planning enquiries email:

Southwark Local Development Framework and Development Plan Documents	London SE1 2QH	planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5604 Council website: www.southwark.gov.uk
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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	3 January 2019	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team	4 January 2019	

APPENDIX 1

Consultation undertaken

Site notice date: 30/01/2018

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
Waste Management

Statutory and non-statutory organisations consulted:

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

Neighbour and local groups consulted:

79 Haymerle Road London SE15 6SQ	Flat A 70 Glengall Road SE15 6NH
77 Haymerle Road London SE15 6SQ	Flat 4 41 Glengall Road SE15 6NF
83 Haymerle Road London SE15 6SQ	Basement Flat 72 Glengall Road SE15 6NH
81 Haymerle Road London SE15 6SQ	Flat B 70 Glengall Road SE15 6NH
71 Haymerle Road London SE15 6SQ	85 Galleria Court Sumner Road SE15 6PW
69 Haymerle Road London SE15 6SQ	72 Galleria Court Sumner Road SE15 6PW
75 Haymerle Road London SE15 6SQ	4 Galleria Court Sumner Road SE15 6PW
73 Haymerle Road London SE15 6SQ	74 Galleria Court Sumner Road SE15 6PW
35a Glengall Road London SE15 6NJ	64 Galleria Court Sumner Road SE15 6PW
80b Glengall Road London SE15 6NH	61 Galleria Court Sumner Road SE15 6PW
Flat 1 Denstone House Friary Estate SE15 6SG	69 Galleria Court Sumner Road SE15 6PW
18a Latona Road London SE15 6RX	65 Galleria Court Sumner Road SE15 6PW
76b Glengall Road London SE15 6NH	53 Galleria Court Sumner Road SE15 6PW
76a Glengall Road London SE15 6NH	70 Galleria Court Sumner Road SE15 6PW

80a Glengall Road London SE15 6NH
76c Glengall Road London SE15 6NH
74 Latona Road London SE15 6RY
72 Latona Road London SE15 6RY
78 Latona Road London SE15 6RY
76 Latona Road London SE15 6RY
66 Latona Road London SE15 6RY
64 Latona Road London SE15 6RY
70 Latona Road London SE15 6RY
68 Latona Road London SE15 6RY
80 Latona Road London SE15 6RY
92 Latona Road London SE15 6RY
90 Latona Road London SE15 6RY
67 Haymerle Road London SE15 6SQ
65 Haymerle Road London SE15 6SQ
84 Latona Road London SE15 6RY
82 Latona Road London SE15 6RY
88 Latona Road London SE15 6RY
86 Latona Road London SE15 6RY
Flat 10 Denstone House Friary Estate SE15 6SG
1 Unwin Close London SE15 6SH
Flat 9 Denstone House Friary Estate SE15 6SG
11 Unwin Close London SE15 6SH
10 Unwin Close London SE15 6SH
Flat 6 Denstone House Friary Estate SE15 6SG
Flat 5 Denstone House Friary Estate SE15 6SG
Flat 8 Denstone House Friary Estate SE15 6SG
Flat 7 Denstone House Friary Estate SE15 6SG
12 Unwin Close London SE15 6SH
18 Unwin Close London SE15 6SH
17 Unwin Close London SE15 6SH
2 Unwin Close London SE15 6SH
19 Unwin Close London SE15 6SH
14 Unwin Close London SE15 6SH
13 Unwin Close London SE15 6SH
16 Unwin Close London SE15 6SH
15 Unwin Close London SE15 6SH
Flat 16 Denstone House Friary Estate SE15 6SG
Flat 15 Denstone House Friary Estate SE15 6SG
Flat 18 Denstone House Friary Estate SE15 6SG
Flat 17 Denstone House Friary Estate SE15 6SG
Flat 12 Denstone House Friary Estate SE15 6SG
Flat 11 Denstone House Friary Estate SE15 6SG
Flat 14 Denstone House Friary Estate SE15 6SG
Flat 13 Denstone House Friary Estate SE15 6SG
Flat 19 Denstone House Friary Estate SE15 6SG
Flat 24 Denstone House Friary Estate SE15 6SG
Flat 23 Denstone House Friary Estate SE15 6SG
Flat 4 Denstone House Friary Estate SE15 6SG
Flat 3 Denstone House Friary Estate SE15 6SG
Flat 20 Denstone House Friary Estate SE15 6SG
Flat 2 Denstone House Friary Estate SE15 6SG
Flat 22 Denstone House Friary Estate SE15 6SG
Flat 21 Denstone House Friary Estate SE15 6SG
67 Glengall Road London SE15 6RU
65 Glengall Road London SE15 6RU
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69 Glengall Road London SE15 6RU
59 Glengall Road London SE15 6RU
117 Glengall Road London SE15 6RU
63 Glengall Road London SE15 6RU
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79 Glengall Road London SE15 6RU
108 Glengall Road London SE15 6RR
68 Galleria Court Sumner Road SE15 6PW
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31 Galleria Court Sumner Road SE15 6PW
52 Galleria Court Sumner Road SE15 6PW
47 Galleria Court Sumner Road SE15 6PW
86 Galleria Court Sumner Road SE15 6PW
54 Galleria Court Sumner Road SE15 6PW
78 Galleria Court Sumner Road SE15 6PW
Unit 2 Glengall Business Centre SE15 6NF
Unit 1 Glengall Business Centre SE15 6NF
Unit 4 Glengall Business Centre SE15 6NF
Unit 3 Glengall Business Centre SE15 6NF
43 Galleria Court Sumner Road SE15 6PW
33 Galleria Court Sumner Road SE15 6PW
55 Galleria Court Sumner Road SE15 6PW
20 Galleria Court Sumner Road SE15 6PW
Unit 5 Glengall Business Centre SE15 6NF
Units 10 To 13 Glengall Business Centre SE15 6NF
153 Galleria Court Pennack Road SE15 6PY
7 Galleria Court Sumner Road SE15 6PW
Unit 7 Glengall Business Centre SE15 6NF
Unit 6 Glengall Business Centre SE15 6NF
Unit 9 Glengall Business Centre SE15 6NF
Unit 8 Glengall Business Centre SE15 6NF
67 Galleria Court Sumner Road SE15 6PW
75 Galleria Court Sumner Road SE15 6PW
82 Galleria Court Sumner Road SE15 6PW
77 Galleria Court Sumner Road SE15 6PW
80 Galleria Court Sumner Road SE15 6PW
79 Galleria Court Sumner Road SE15 6PW
84 Galleria Court Sumner Road SE15 6PW
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42 Galleria Court Sumner Road SE15 6PW
9 Galleria Court Sumner Road SE15 6PW
93 Galleria Court Pennack Road SE15 6PY
87 Galleria Court Pennack Road SE15 6PY
Flat 7 77 Trafalgar Avenue SE15 6NZ
Flat 6 77 Trafalgar Avenue SE15 6NZ
Flat 9 77 Trafalgar Avenue SE15 6NZ
Flat 8 77 Trafalgar Avenue SE15 6NZ
Flat 3 77 Trafalgar Avenue SE15 6NZ
Flat 2 77 Trafalgar Avenue SE15 6NZ
Flat 5 77 Trafalgar Avenue SE15 6NZ
Flat 4 77 Trafalgar Avenue SE15 6NZ
Flat 6 53 Colegrove Road SE15 6NU
Flat 5 53 Colegrove Road SE15 6NU
Flat 8 53 Colegrove Road SE15 6NU
Flat 7 53 Colegrove Road SE15 6NU
Flat 2 53 Colegrove Road SE15 6NU
Flat 1 53 Colegrove Road SE15 6NU

106 Glengall Road London SE15 6RR
112 Glengall Road London SE15 6RR
110 Glengall Road London SE15 6RR

100 Glengall Road London SE15 6RR
104 Glengall Road London SE15 6RR
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4 Latona Road London SE15 6RX
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33 Ednam House Friary Estate Latona Road SE15 6SE
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7 Ednam House Friary Estate Latona Road SE15 6SE
6 Ednam House Friary Estate Latona Road SE15 6SE

Flat 4 53 Colegrove Road SE15 6NU
Flat 3 53 Colegrove Road SE15 6NU
Inspiration House Second Floor 54-80 Ossory Road SE1 5AN
Surrey Wharf 30 Olmar Street SE1 5AY
74c Glengall Road London SE15 6NH
Unit 0z05 Ground Floor 54-80 Ossory Road SE1 5AN
Top Floor Flat 68 Glengall Road SE15 6NH
20 Latona Road London SE15 6RX
Room 4 78b Glengall Road SE15 6NH
66c Glengall Road London SE15 6NH
Flat 10 77 Trafalgar Avenue SE15 6NZ
Flat 1 77 Trafalgar Avenue SE15 6NZ
Flat 12 77 Trafalgar Avenue SE15 6NZ
Flat 11 77 Trafalgar Avenue SE15 6NZ
74a Glengall Road London SE15 6NH
66a Glengall Road London SE15 6NH
74b Glengall Road London SE15 6NH
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147 Galleria Court Pennack Road SE15 6PY
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Flat B 44 Glengall Road SE15 6NH
26 Galleria Court Sumner Road SE15 6PW
24-50 Ossory Road London SE1 5AN
Ground Floor And First Floor 54-80 Ossory Road SE1 5AN
Flat A 44 Glengall Road SE15 6NH
Asda 478-500 Old Kent Road SE1 5AS
45 Ossory Road London SE1 5AN
Rear Of 90 Latona Road SE15 6RY
52 Ossory Road London SE1 5AN
Part Ground Floor First Floor And Second Floor 3-5 Latona Road SE15 6RX
Part Ground Floor 3-5 Latona Road SE15 6RX
Ground Floor 55 Glengall Road SE15 6NF
First Floor Flat 57 Glengall Road SE15 6NF
Christ Apostolic Church Mount Zion International 1a Sumner Road SE15 6LA
19 Pennack Road London SE15 6DD
17 Pennack Road London SE15 6DD
23 Pennack Road London SE15 6DD
21 Pennack Road London SE15 6DD
11 Pennack Road London SE15 6DD
1 Pennack Road London SE15 6DD
15 Pennack Road London SE15 6DD
13 Pennack Road London SE15 6DD
Second Floor And Third Floor 55 Glengall Road SE15 6NF
Hand Car Wash Asda SE1 5AG
140 Galleria Court Pennack Road SE15 6PY

18 Ednam House Friary Estate Latona Road SE15 6SE
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51 Ednam House Friary Estate Latona Road SE15 6SF
3 Brideale Close London SE15 6NB
2 Brideale Close London SE15 6NB
7 Brideale Close London SE15 6NB
6-7 Brideale Close London SE15 6NB
Unit 1 Horizon Industrial Estate SE15 6SA
57 Glengall Road London SE15 6NF
1 Brideale Close London SE15 6NB
9 Brideale Close London SE15 6NB
15 Brideale Close London SE15 6NB
14 Brideale Close London SE15 6NB
16 Brideale Close London SE15 6NB
11 Brideale Close London SE15 6NB
10 Brideale Close London SE15 6NB
13 Brideale Close London SE15 6NB
12 Brideale Close London SE15 6NB
25 Unwin Close London SE15 6SH
24 Unwin Close London SE15 6SH
27 Unwin Close London SE15 6SH
26 Unwin Close London SE15 6SH
21 Unwin Close London SE15 6SH
20 Unwin Close London SE15 6SH
134 Galleria Court Pennack Road SE15 6PY
5 Galleria Court Sumner Road SE15 6PW
First Floor Flat 40a Glengall Road SE15 6NH
Studio 1 55 Glengall Road SE15 6NF
Flat 8 41 Glengall Road SE15 6NF
118 Galleria Court Pennack Road SE15 6PY
7-17 Latona Road London SE15 6RY
Flat 5 41 Glengall Road SE15 6NF
4-5 Brideale Close London SE15 6NB
Flat 7 41 Glengall Road SE15 6NF
Flat 6 41 Glengall Road SE15 6NF
25 Pennack Road London SE15 6DD
33 Glengall Road London SE15 6NJ
31 Glengall Road London SE15 6NJ
37 Glengall Road London SE15 6NJ
35 Glengall Road London SE15 6NJ
39 Glengall Road London SE15 6NJ
7 Glengall Terrace London SE15 6NW
6 Glengall Terrace London SE15 6NW
9 Glengall Terrace London SE15 6NW
8 Glengall Terrace London SE15 6NW
3 Glengall Terrace London SE15 6NW
1 Glengall Terrace London SE15 6NW
5 Glengall Terrace London SE15 6NW
4 Glengall Terrace London SE15 6NW
9 Pennack Road London SE15 6DD
5 Pennack Road London SE15 6DD
62 Colegrove Road London SE15 6ND
60 Colegrove Road London SE15 6ND
29 Pennack Road London SE15 6DD
27 Pennack Road London SE15 6DD
31 Pennack Road London SE15 6DD
3 Pennack Road London SE15 6DD
64 Colegrove Road London SE15 6ND
46 Glengall Road London SE15 6NH
40 Glengall Road London SE15 6NH
42 Glengall Road London SE15 6NH
101 Galleria Court Pennack Road SE15 6PY
100 Galleria Court Pennack Road SE15 6PY
105 Galleria Court Pennack Road SE15 6PY
104 Galleria Court Pennack Road SE15 6PY
71 Galleria Court Sumner Road SE15 6PW
46 Galleria Court Sumner Road SE15 6PW
88 Galleria Court Pennack Road SE15 6PY
83 Galleria Court Sumner Road SE15 6PW
107 Galleria Court Pennack Road SE15 6PY
95 Galleria Court Pennack Road SE15 6PY
92 Galleria Court Pennack Road SE15 6PY
97 Galleria Court Pennack Road SE15 6PY
96 Galleria Court Pennack Road SE15 6PY
89 Galleria Court Pennack Road SE15 6PY
124 Galleria Court Pennack Road SE15 6PY
91 Galleria Court Pennack Road SE15 6PY
90 Galleria Court Pennack Road SE15 6PY
13 Galleria Court Sumner Road SE15 6PW
12 Galleria Court Sumner Road SE15 6PW
103 Galleria Court Pennack Road SE15 6PY
8 Galleria Court Sumner Road SE15 6PW
First Floor Flat 50 Glengall Road SE15 6NH
6 Galleria Court Sumner Road SE15 6PW
Ground Floor Flat 50 Glengall Road SE15 6NH
Second Floor Flat 50 Glengall Road SE15 6NH
10 Galleria Court Sumner Road SE15 6PW
36 Galleria Court Sumner Road SE15 6PW
28 Galleria Court Sumner Road SE15 6PW
41 Galleria Court Sumner Road SE15 6PW
37 Galleria Court Sumner Road SE15 6PW
133 Galleria Court Pennack Road SE15 6PY
11 Galleria Court Sumner Road SE15 6PW
18 Galleria Court Sumner Road SE15 6PW
2 Galleria Court Sumner Road SE15 6PW
98 Galleria Court Pennack Road SE15 6PY

23 Unwin Close London SE15 6SH	131 Galleria Court Pennack Road SE15 6PY
22 Unwin Close London SE15 6SH	130 Galleria Court Pennack Road SE15 6PY
28 Unwin Close London SE15 6SH	136 Galleria Court Pennack Road SE15 6PY
8 Unwin Close London SE15 6SH	135 Galleria Court Pennack Road SE15 6PY
7 Unwin Close London SE15 6SH	127 Galleria Court Pennack Road SE15 6PY
Haymerle School Haymerle Road SE15 6SY	126 Galleria Court Pennack Road SE15 6PY
9 Unwin Close London SE15 6SH	129 Galleria Court Pennack Road SE15 6PY
4 Unwin Close London SE15 6SH	128 Galleria Court Pennack Road SE15 6PY
3 Unwin Close London SE15 6SH	137 Galleria Court Pennack Road SE15 6PY
6 Unwin Close London SE15 6SH	144 Galleria Court Pennack Road SE15 6PY
5 Unwin Close London SE15 6SH	143 Galleria Court Pennack Road SE15 6PY
Unit 3 To 4 Horizon Industrial Estate SE15 6SA	146 Galleria Court Pennack Road SE15 6PY
90 Haymerle Road London SE15 6SB	145 Galleria Court Pennack Road SE15 6PY
55 Glengall Road London SE15 6NF	139 Galleria Court Pennack Road SE15 6PY
Hygrade Meats Ltd Latona Road SE15 6RX	138 Galleria Court Pennack Road SE15 6PY
3-5 Latona Road London SE15 6RX	142 Galleria Court Pennack Road SE15 6PY
Ground Floor Flat 72 Glengall Road SE15 6NH	141 Galleria Court Pennack Road SE15 6PY
Ground Floor Flat 68 Glengall Road SE15 6NH	111 Galleria Court Pennack Road SE15 6PY
14 Frensham Street London SE15 6TH	110 Galleria Court Pennack Road SE15 6PY
66b Glengall Road London SE15 6NH	113 Galleria Court Pennack Road SE15 6PY
Third Floor Flat Surrey Wharf SE1 5AU	112 Galleria Court Pennack Road SE15 6PY
10 Ednam House Friary Estate Latona Road SE15 6SE	106 Galleria Court Pennack Road SE15 6PY
1 Ednam House Friary Estate Latona Road SE15 6SE	99 Galleria Court Pennack Road SE15 6PY
12 Ednam House Friary Estate Latona Road SE15 6SE	109 Galleria Court Pennack Road SE15 6PY
11 Ednam House Friary Estate Latona Road SE15 6SE	108 Galleria Court Pennack Road SE15 6PY
48b Glengall Road London SE15 6NH	114 Galleria Court Pennack Road SE15 6PY
48a Glengall Road London SE15 6NH	122 Galleria Court Pennack Road SE15 6PY
First Floor And Second Floor Flat 72 Glengall Road SE15 6NH	121 Galleria Court Pennack Road SE15 6PY
78b Glengall Road London SE15 6NH	125 Galleria Court Pennack Road SE15 6PY
Flat 2 41 Glengall Road SE15 6NF	123 Galleria Court Pennack Road SE15 6PY
Flat 1 41 Glengall Road SE15 6NF	116 Galleria Court Pennack Road SE15 6PY
Unit 2 Horizon Industrial Estate SE15 6SA	115 Galleria Court Pennack Road SE15 6PY
93 Haymerle Road London SE15 6SQ	120 Galleria Court Pennack Road SE15 6PY
78a Glengall Road London SE15 6NH	119 Galleria Court Pennack Road SE15 6PY
2 Glengall Terrace London SE15 6NW	36a Bird In Bush Rd Peckham se156rw
Flat 3 41 Glengall Road SE15 6NF	7a Manor Place London SE17 3BD
Flat C 70 Glengall Road SE15 6NH	Galleria Court, Sumner Rd London SE15 6PW
Basement Flat 68 Glengall Road SE15 6NH	Unit 21 Tower Workshops London SE2 3DG
Ground Floor Flat 40a Glengall Road SE15 6NH	17 Lulworth House Dorset Road SW8 1DR
Ground Floor And First Floor Flat 27 Glengall Road SE15 6NJ	C/O Benedict O'Looney, Riba 56 Pennethorne Road SE15 5TQ

Re-consultation: 11/06/2018

APPENDIX 2

Consultation responses received

Internal services

Economic Development Team

Statutory and non-statutory organisations

Environment Agency
Greater London Authority
Historic England
London Fire & Emergency Planning Authority
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Thames Water - Development Planning

Neighbours and local groups

C/O Benedict O'Looney, Riba 56 Pennethorne Road SE15 5TQ
Galleria Court, Sumner Rd London SE15 6PW
Unit 21 Tower Workshops London SE2 3DG
17 Galleria Court Sumner Road SE15 6PW
17 Lulworth House Dorset Road SW8 1DR
36a Bird In Bush Rd Peckham se156rw
5 Glengall Terrace London SE15 6NW
53 Galleria Court Sumner Road SE15 6PW
55 Glengall Road London SE15 6NF
57 Glengall Road London SE15 6NF
60 Galleria Court Sumner Road SE15 6PW
7a Manor Place London SE17 3BD
76c Glengall Road London SE15 6NH
83 Galleria Court Sumner Road SE15 6PW
83 Galleria Court Sumner Road SE15 6PW
84 Galleria Court Sumner Road SE15 6PW
85 Galleria Court Sumner Road SE15 6PW
86 Galleria Court Sumner Road SE15 6PW
88 Galleria Court Pennack Road SE15 6PY
88 Galleria Court Pennack Road SE15 6PY
90 Haymerle Road London SE15 6SB