

Item No. 6.1	Classification: Open	Date: 06 February 2019	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 17/AP/4088 for: Part Full Planning Permission/Part Outline Planning Permission Address: TOWER BRIDGE BUSINESS COMPLEX, 100 CLEMENTS ROAD AKA THE BISCUIT FACTORY & BERMONDSEY CAMPUS SITE, KEETONS ROAD LONDON, SE16 4DG Proposal: Full planning permission for demolition, alterations and extension of existing buildings and erection of new buildings comprising a mixed use scheme providing up to 1,217 residential units, up to 3,795 sqm GEA of flexible Class A1/A3/A4 floorspace, up to 12,023 sqm GEA of flexible Class B1/B2, up to 922 sqm GEA of flexible Class D1.D2 and up to 3,882 sqm GEA of multi-use floorspace (A1/A3/A4/D1) within building BF-F and a new secondary school, in buildings ranging from 4 to 28 storeys in height as well as the creation of a single storey basement. The development also includes communal amenity space, landscaping, children's playspace, car and cycle parking, installation of plant, new pedestrian, vehicular and servicing routes, the creation of two new pedestrian routes through the Railway Arches and associated works and Outline planning permission (with all matters reserved) for the part demolition and part retention of existing buildings and erection of two new buildings comprising a mixed use scheme providing up to 125 residential units and up to 781 sqm GEA of flexible Class A1/A3/A4/D1/Sui Generis Uses and other associated works.		
Ward(s) or groups affected:	North Bermondsey		
From:	Director of Planning		
Application Start Date 24.10.2017		Application Expiry Date 13.12.2018	
Earliest Decision Date 13.12.2017			

RECOMMENDATION

1. That planning permission is REFUSED for the following reasons.

Reason 1

2. The development fails to provide the maximum reasonable amount of affordable housing, and the affordable housing offered would be at a cost which would not be affordable to those in greatest housing need. As such, the development does not maximise the delivery of affordable housing as required by saved Southwark Plan policy 4.4 'Affordable housing', Core Strategy policy SP6 'Housing for people on different incomes' and London Plan policy 3.12 'Negotiating affordable housing on individual private residential developments', or the Mayors Affordable Housing and Viability SPD 2017. In addition, the development does not comply with the specific requirements for Private Rented Housing set out in the submission version (2018) of

the New Southwark Plan policy P4 'Private rented homes' in terms of the tenure split or the period for which the PRS housing is secured, or with the draft new London Plan 2017 policy H13 'Build to Rent' in terms of the type of DMR homes being offered. As such, the development would fail to offer genuinely affordable housing to meet a recognised and acute housing need.

Reason 2

3. The development is above the density range for an urban area set out in Saved Southwark Plan policy 4.1 'Density of residential development' and London Plan policy 3.4 'Optimising housing potential', but does not provide an exemplary quality of accommodation for its future residents to combat the potential negative impacts of high density living. Specifically, the development provides a high proportion of single aspect dwellings, including dwellings which have a northerly aspect, or a constrained outlook, and dwellings with the sole aspect towards a large railway viaduct so subject to noise and overheating. A significant proportion of flats also do not have access to private amenity space. The qualitative aspects of the housing design would not meet the expectations of the draft London Plan 2017 policies D4 'Housing Quality and Standards' and D6 'Optimising housing density' as well as the standards for amenity space and aspect contained in Saved Southwark Plan (2007) policy 4.2 'Residential Quality' and the Southwark Residential Design Standards SPD 2015. As such, the development would not provide a suitably high quality of residential amenity for future occupiers, and increase the likelihood of use of mechanical heating, cooling and ventilation due to the aspect and need to mitigate noise and overheating.

Reason 3

4. The 'blind spots', convoluted and illogical internal routes proposed for pedestrians/cyclists and motorised vehicles would exacerbate pedestrian-vehicle and vehicular conflict and subsequently create adverse impact on highway safety, contrary to the Saved Southwark Plan 2007 Policies 5.2 'Transport impacts' part ii and 5.3 'Walking and cycling' parts i and ii, Strategic Policy 2 'Sustainable transport' of the Core Strategy 2011 plus New Southwark Plan 2018 Policies P11 'Design of places' parts 1.5 and 1.7, P47 'Highways impacts' part 4 and P48 'Walking' part 3.

Reason 4

5. In the absence of a clear agreement with the owners of the arch spaces, the proposed development would not secure the delivery of the two pedestrian routes through the viaduct which are a requirement of site designation NSP10 of the Submission Version of the New Southwark Plan.

EXECUTIVE SUMMARY

Background

6. This hybrid application (part fully detailed, part in outline) has been submitted by Grosvenor to develop a 6.2ha site comprising the former Peek Frean biscuit factory and adjoining former Lewisham and Southwark College campus site close to Bermondsey underground station. The development would provide up to 1,342 private rented sector (PRS) flats, plus employment, retail and leisure space and a replacement secondary school, all in buildings up to 28 storeys high. The site, in conjunction with the adjacent railway arches, is designated in the submission version of the New Southwark Plan as NSP10 for business, housing, town centre uses, open space and a secondary school, and the proposed land uses conform with this designation. There are clear benefits arising from the development including more

efficient use of a redundant industrial site, a significant number of new homes, improved school facilities, new open spaces, and potential new routes through the railway viaduct to link to The Blue. However, these benefits are not outweighed by the failure to provide the maximum reasonable amount of affordable housing, the quality of some aspects of the residential accommodation, and the risk of conflicts between vehicles and pedestrians which arise from the service routes within the site. Despite very lengthy negotiations, it has not been possible to reach agreement on these critical issues, and therefore this report recommends that planning permission be refused.

Design

7. The site is not within a conservation area and there are no Listed buildings on or close to the site. The surrounding area is mainly low or medium rise housing, with some isolated examples of residential towers visible in the surrounding townscape. The Biscuit factory and Campus sites together are the largest redevelopment opportunity in this area, and have the potential to significantly influence the emerging character of the area.
8. The height and design of the proposed buildings has been the subject of many of the objections to the application. The scheme includes a number of buildings which would be defined as 'tall buildings' under saved Southwark Plan policy 3.20, including two significantly tall buildings, at 19 and 28 storeys, which sit at the centre of the site adjacent to the railway viaduct. The principle of including tall buildings at the centre of the site, at the point that new routes would converge, is supported, would provide a focus in wider views, and would have limited amenity impacts on existing occupiers. The buildings at the periphery of the site, for instance along Drummond Road, are of a lower order, but still noticeably taller than the existing buildings such as the Four Squares blocks. There are some daylight and sunlight impacts resulting from these buildings, beyond the levels recommended by the BRE. These issues have been carefully considered, and expert reports commissioned, and on balance it is concluded that in townscape terms the buildings could make a suitable contribution to the character of the area, their design is of a high quality, and the impacts on neighbours' amenity is not so harmful as to warrant refusal of permission on these grounds. It is noted that the GLA supported the scale and massing, considering that it provided an appropriate response to contextual sensitivities, and that the design review panel (DRP) in their series of reviews of the emerging design also gave positive comments.
9. The issues relating to height and design are covered in paragraphs 279 to 357 in the report.

Affordable Housing

10. Private rental sector (PRS) housing (referred to in the London Plan and in Grosvenor's documents as Build to Rent) is a relatively new form of housing tenure which is supported in the NPPF and the London Plan, and the emerging policies of the NSP and draft London Plan. In this case, the estate would be held and managed by Grosvenor for the long term, including the proposed Discount Market Rent units, which would be 'pepper-potted' through the estate in a tenure blind design. However, despite Grosvenor's assertion that this is a long term investment for their company, they have only been willing to offer a 15 year covenant on the PRS, rather than the minimum 30 years required by the NSP. Additionally, and of very significant weight, is the failure to provide what the Council's expert advisors consider to be the maximum amount of affordable housing. Grosvenor's affordable housing offer equates to 27.5% (more accurately 27.37%) of the habitable rooms, let at an average discount of 25% below market rents. This does not provide the 35% affordable housing to comply with

Southwark Plan or NSP. Grosvenor have not made a specific proposal for the mix of affordable unit tenures, but have said that different options could be agreed so long as the total subsidy did not exceed the value of an average 25% reduction. This would not realistically allow for any significant provision of social rent or London Living rent equivalent units, and would not comply with the tenure requirements of NSP policy P4.

11. Policies do allow for viability to be taken into account, and whilst the Council's and Grosvenor's specialist consultants have not been able to reach agreement, it is the opinion of the Council's appointed advisors (GVA) that Grosvenor's offer is not the maximum reasonable amount and tenure split of affordable housing that the development could viably support. It is recommended that permission is refused due to failure to maximise affordable housing delivery at appropriate rent levels. This is set out as reason for refusal number 1 on the attached draft decision notice.
12. The issues relating to affordable housing are set out at paragraphs 166 to 212 of the report.

Housing Quality

13. Whilst many aspects of the new housing are high quality, and all of the units meet the Council's space standards, a significant number of the units have no private amenity space, and 34% of units are single aspect with in some cases very constrained outlook. As a high density scheme, the development would be expected to provide an exemplary quality of accommodation, and there are no inherent site constraints which could justify failure to comply in full with the Residential Design Standards. As such it is recommended that permission be refused on the grounds that the scheme exceeds the density threshold for the area, but the design quality, in terms of the standard of accommodation, does not properly address the issues relating to high density living. This is set out as reason for refusal number 2 of the draft decision notice.
14. Issues relating to housing quality are set out in paragraphs 225 to 278 of the report

Commercial and retail uses

15. As well as the housing, the development includes a significant quantity of commercial space, both for business and retail use. Grosvenor have sought a large degree of flexibility about the future use of the commercial spaces, most of which are at ground floor levels lining the streets, routes and public spaces. There is no requirement to replace the current level of B Class floorspace under adopted policies, and the site allocation NSP10 policy states that redevelopment should include space for business and town centre uses, but does not require any specific amount. The level of retail floorspace which could be delivered has the potential to divert trade away from other designated shopping centres including, most critically, The Blue. Grosvenor have been working with the Bermondsey Business Improvement District team on initiatives to support the viability of that centre, and the BID team have acknowledged the value of this and have given support to the application. However, for the impacts to be managed, some controls would be needed to limit the type of retail which could be provided on the site, and also that the new routes under the viaducts are delivered, so that movement between the site and The Blue is made easier and more attractive. Whilst these routes are part of the application, the arches are not in Grosvenor's ownership, and officers have had no contact with the purchasers of the Network Rail property portfolio. Without any formal agreement between Grosvenor and the new owners there can be no certainty that the routes would be delivered, and this lack of certainty means that the benefits of the routes can be accorded less weight in determining the application. The routes were promoted as a key benefit of the application but Grosvenor can not offer any certainty that they would be able to secure

them. The impact on the Blue could be controlled by conditions or clauses in a s106 agreement, which is not currently in place. The report sets out that, in the event of the application being granted permission, either by the Planning Committee or through an appeal, these measures would need to be secured in an appropriate s106 agreement and suitably worded conditions.

16. The lack of a means to secure the two arch routes is set out as reason for refusal number 4 on the draft decision notice
17. The issues relating to the retail impacts are set out at paragraphs 96 to 119 of the report, and in relation to the arch routes at paragraphs 36 and 120 to 121.

Replacement school

18. The development provides a replacement 600 pupil secondary school for the Compass School. The existing school has been on the Campus site for several years, in buildings which were formerly part of Southwark College. The design of the new school has the support of the Headteacher, and has been designed to conform with the Department for Education standards. It would be funded by the Department for Education who would also pay a land cost. The provision of new schools is a very high priority within the NPPF, and given significant support within London and Southwark Policies. A letter has been received from Lord Agnew, Parliamentary Under Secretary of State for the School System urging the Council to approve the school. The delivery of the new school is therefore a matter which should be accorded very significant weight when determining this application. However, in reaching a decision on the application in its totality, the weight ascribed to the delivery of the school must be balanced against the other, less positive aspects of the proposal, including the failure to maximise affordable housing, and having assessed this officers have concluded that the delivery of the school should not outweigh the failure to comply with other key policies of the development plan.
19. The issues relating to the school are set out primarily at paras 123 to 134 and 297 to 299 of the report

Public realm

20. The development would provide new pedestrian and cycle routes through the site, including a new link to Bermondsey Underground station, and new public spaces including children's play and an elevated public garden. A substantial number of new trees would be planted, the value of which would outweigh the removal of a small number of existing mature trees, and the need for more active management of a number of street trees whose canopies would need to be pruned back.
21. The issues relating to the public realm are set of primarily at paragraphs 337 to 352 of the report.

Servicing and vehicle movement

22. The servicing for the commercial units would be through a combination of new on-street routes and loading bays and some on street service bays. The capacity for loading space is limited and the on-site regime would require active management to ensure vehicles do not block the loading bays. There is a limited level of car parking for the residential units in a basement carpark, and full provision for residents' and employees' cycle parking in locations across the site. Whilst the arrangement is generally supported, there are a limited number of instances where the servicing routes would lead to potential conflicts between vehicles and pedestrians or cyclists due to pinch-points which have poor sight lines. Alternative options which could have overcome these problems were discussed with Grosvenor, but not included in the

application. Therefore it is concluded that those potential safety concerns would justify refusal of the application, as set out in reason for refusal number 4 on the draft decision notice.

23. The issues relating to servicing and transport are set out in paragraphs 499 to 546 of the report.

Environmental Impact Assessment

24. The application is accompanied by an Environmental Statement (an EIA) which assesses the broad impacts of this scale of development on the local area, its environment and the local services. The ES was assessed by an expert on behalf of the Council who found its findings to be sound, and that both positive and negative impacts have been assessed and quantified. The impacts on neighbour amenity in terms of daylight sunlight and overshadowing in some case go beyond those recommended by the BRE, and this must be balanced against other benefits and dis-benefits of the application when a decision is made.
25. The issues relating to the EIA are set out primarily at paragraphs 141 to 165 and 596 to 602 of the report

S106 terms

26. S106 Heads of Terms were submitted with the application, and some limited progress was made on formulating a s106 agreement. In the event that Members were minded to grant permission, or if the application was called in by the Mayor or decided under Appeal to the Planning Inspectorate, then a s106 agreement would need to be negotiated and concluded. This would need to include provisions to secure affordable housing and public realm and transport improvements, limitations on the retail and commercial units including affordable workspace, employment and training provisions, and other contributions to mitigate impacts on the local area.
27. Issues relating to s106 are set out at paras 604 to 607 of the report

Consultation responses

28. Following two rounds of consultation, 148 responses objecting to the application, and 24 in support were received. In terms of the objections, 115 raised the issues of affordable housing, and 36 raised concerns about height and design. Other issues raised included daylight/overshadowing, pressure on local infrastructure, road congestion and pollution. The primary reasons for support included the new routes through the arches, the benefits for the Blue, employment opportunities and the new school. Grosvenor did extensive public consultation prior to submitting the application.
29. The issues relating to consultation are set out primarily at paras 621 to 760 of the report.

Referral to the Mayor

30. If the committee resolve to refuse planning permission, the application would then be referred to the Mayor for London for his 'Stage 2 Direction' through which he determines whether he is content for the Council to issue its decision, or whether he wishes to call the application in for his decision.

BACKGROUND INFORMATION

31. The name of the site as the Biscuit Factory refers to the historic use of the site. The

original Biscuit Factory occupied the part of the site which is south of Clements Road and was occupied by the Peek Frean Biscuit Factory, which employed a workforce which peaked at a maximum of 3,000 employees in a number of buildings throughout the site. The operations of Peek Frean changed during the latter quarter of the 20th century and the factory ceased operation in 1989.

32. A hybrid planning application for this part of the site was granted planning permission in 2013 for a residential-led mixed use redevelopment including up to 800 homes in buildings up to 9 storeys high (our reference 12/AP/2737, see Planning History Section below).
33. This site was acquired by Grosvenor (The Applicants) in 2013. A Certificate of Lawfulness (16/AP/5015) confirming that permission 12/AP/2737 has been implemented and could be built out was issued in February 2017. The Applicants also acquired the former Lewisham and Southwark College site which has frontages onto Webster Road, Drummond Road and Keeton's Road directly to the north of the Biscuit Factory site. This land is referred to in the application as the 'Campus Site'.
34. Following their purchase of both sites and the amalgamation of these to create a larger Masterplan site, the applicants entered into initial pre-application discussions with the Council in 2014. These discussions stalled in 2015 and a new design team were appointed in 2016 following a design competition. New pre-application discussions with the Council commenced at the end of 2016.
35. This application is a culmination of a lengthy pre-application process which has involved discussions with the Council as the Local Planning Authority, the Greater London Authority (GLA), Transport for London (TFL) as well as number of public consultation events with the local community. The pre-application discussions also included Network Rail, who at that time were the owners of the viaduct and the employment space within the railway arches. It was always assumed by both the applicants and Network Rail that the application for the Biscuit Factory would be accompanied by a concurrent application for the refurbishment and re-use of the neighbouring viaduct arches, and much of the submitted documentation for the Biscuit Factory pre-supposes that this is the case. The planning statement for the application states that there are 165 arches within the viaduct that could be refurbished and activated by such a proposal. To date no application has been received for the arches. The main reason for the delay in submission is that the arches form part of the commercial estate portfolio of Network Rail which has been up for sale and for which the terms have been agreed with Telereal Trillium and Blackstone Property Partners. Officers have had no contact to date with the prospective new owners regarding the Arches.

Site location and description

36. The site has an area of approximately 6.2ha and has a natural ground level between 2m and 3m Above Ordnance Datum (AOD). It is bounded by Drummond Road to the east, the railway line to the south, St James Road and Keeton's Road to the west and existing residential properties on Tranton Road and Clements Road to the north. The surrounding area is predominantly residential, although there are religious, industrial and retail uses in close proximity to the site. Bermondsey Underground station is situated approximately 250m north of the site while the Blue shopping centre is approximately 150m to the south west beyond the existing railway line. Public Transport Accessibility Levels (PTAL) for the site are predominantly level 3 (moderate) and 4 (good).

Image 1 - Existing Site Layout

**for illustrative purposes only*



37. Image 2 – Aerial Photograph of site



38. The overall site is made up of two parts. The Biscuit Factory site is bounded by St Clements Road to the north, Drummond Road to the east, the railway viaduct to the south and St James Road to the west. On this site there are 13 existing buildings ranging in height from one to seven storeys. The existing buildings are all 20th century buildings and are in use as a variety of business/commercial units. Eight of these buildings are operated by Workspace and two of these are currently subject to redevelopment as part of the implementation of the Plot 5 planning permission (15/AP/3279). The Workspace buildings will be retained and integrated into the wider masterplan however they are outside of the ownership of the applicant and do not form part of the proposed development. The surrounding public realm is predominantly hardstanding although there are some mature trees located in the central car parking/courtyard area formed by buildings E, F, H and N.
39. The Campus site is situated to the north of St Clements Road and is predominantly surrounded by low rise residential development. This site contains eight existing buildings, of which four are currently occupied by the Compass School. The other buildings are occupied by temporary alternative uses. Under the application, these buildings would all be demolished and the site redeveloped.
40. The site is situated within a predominantly residential area containing a mix of terraced properties and housing estates. To the north and west lies predominantly two and three storey housing with a mix of Victorian properties and more recent 1980s and 1990s low rise developments. To the east lies the Four Squares Estate, which are a series of municipal residential blocks characterised by four part 4 storey/part 7 storey perimeter blocks each situated around their own communal courtyard, dating from 1970s. Further to the east lies Southwark Park. On the opposite side of the railway viaduct area further residential blocks of mixed character and beyond that is the Blue town centre which is designated as a local shopping centre in Southwark's Core Strategy and provides local shops and services. The nearest underground station is Bermondsey on the Jubilee Line, located to the north around 250m from the closest point to the site.
41. The site is not within a Conservation Area nor are there any listed buildings on the site. However it is situated within the wider setting of the following listed buildings,

listed park and conservation area:

Grade II* Listed Church of St James, Thurland Road
Grade II Listed St Crispin with Christchurch, Southwark Park Road
Grade II Listed Southwark Park School, Southwark Park Road
Grade II Listed Group of buildings Nos. 124-130 Jamaica Road
Grade II Listed Southwark Park

Wilson Grove Conservation Area

42. There are no Tree Preservation Orders in place on or around the site however the streets surrounding the site do have mature street trees which make an important contribution towards the character of the area. There are also 5 mature London Plane trees within the Biscuit Factory Site. The quality of the existing trees is highlighted in Image 3 below.

Image 3 – View looking north from roof of retained building BF-F



43. There are a number of existing uses occurring at the site within the existing buildings. Many of these are temporary uses which are occupying buildings on short term lets prior to the redevelopment of the site. A breakdown of the floor space for the existing uses on site is set out in Table 1 below:

Table 1 – Existing Uses

Use Class	Floor Area (SQM) (GIA)
B1	2,169
B1/B2/B8	26,055
D1	6,353
Sui Generis	7,654
A3	288
Total	42,518

44. The New Southwark Plan (NSP) vision for Bermondsey identifies the area as an inner London neighbourhood characterised by modest worker houses associated with the historic Rotherhithe docks and local manufacturing industries such as biscuits, jam, vinegar and pickles. It is an area notable for its employment clusters as well as having good public transport links.
45. The site, along with the neighbouring railway viaduct and Workspace buildings, is covered by the Site Specific Allocation NSP10 in the NSP. The site vision states that the redevelopment of the site must:
- Deliver a comprehensive mixed use development including at least 1500 homes;
 - Support new and replacement business floor space, including space for small and medium enterprises (B1);
 - Provide a replacement school;
 - Provide two new links to the Blue under the railway viaduct;
 - Provide active frontages with town centre uses (A1, A2, A3, A4, D1, D3) at ground floor level, enhancing the adjacent Low Line walking route;
 - Provide a new link between Bermondsey underground station and the Biscuit Factory site down Keeton's Road
 - Enhance the adjacent Low Line walking route to the railway viaduct.
46. The extent to which the application complies with this designation is set out in paragraph 140 below.

Details of proposal

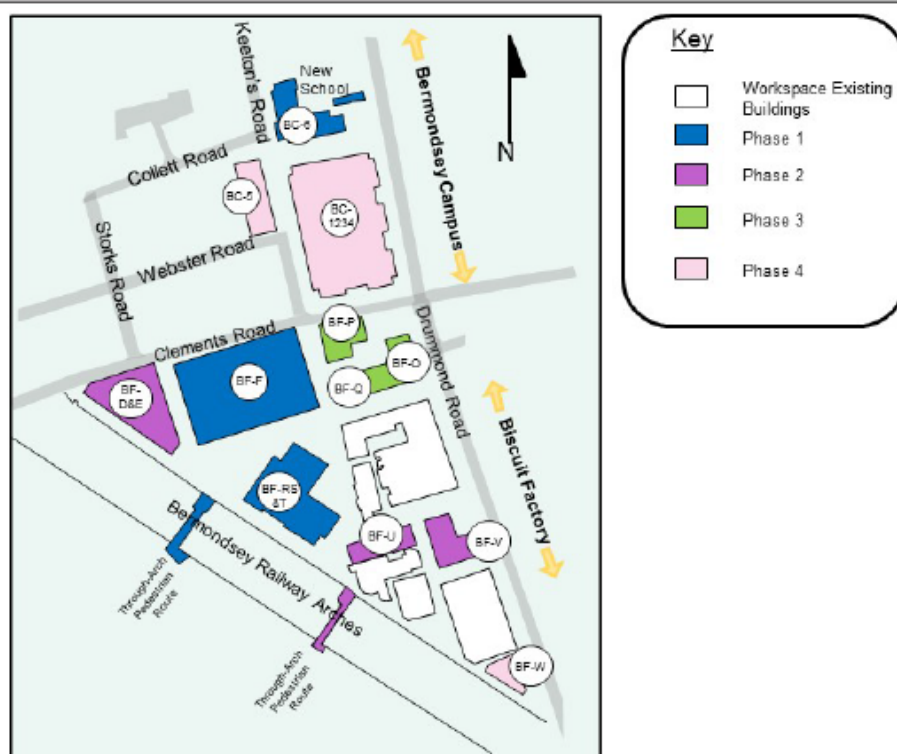
47. The applicants have applied for permission for the demolition of most the buildings on their site to allow for construction of 1,342 new dwellings, 24,516 sqm of non-residential floor space as well as the provision of new areas of public realm and two new pedestrian routes through the viaduct towards 'The Blue' local shopping centre and other areas south of the railway viaduct. The proposed development would be accommodated within 9 plots across the Masterplan site in buildings ranging from 4storeys in height up to 28 storeys, including the retained and extended building BF-F on Clement's Road.
48. The residential accommodation proposed would all be provided as Private Rental Sector (PRS). This includes the affordable accommodation which would be provided as Discounted Market Rent (DMR) accommodation. Grosvenor proposed to retain interest in the proposed development and would professionally manage the accommodation following its completion.
49. The application is in a 'hybrid' form, with Full permission sought for the majority of the development and the remaining aspects provided in Outline only. The two parts of the application are described below. The development would comprise the demolition of a total of 11 buildings and the comprehensive development of Site. Existing Building BF-F in the Detailed component and existing Building F-D in the Outline Component are to be retained, altered and extended.
50. The detailed component involves the erection of 16 buildings, some of which are linked structures, as well as extending Building F-F, to provide:
- 1,217 residential units;
 - 600 pupil replacement secondary school;
 - 3,795sqm (GEA) of Class A1/A3/A4 floor space
 - 12,023sqm (GEA) flexible business/employment floor space (Class B1)

- 922sqm (GEA) of flexible class D1/D2 floorspace; and
 - 3,882sqm (GEA) of Class A1/A3/A4/D1 multi-use floorspace in Building BF-F
51. The outline component would comprise the part demolition and part retention of one existing building (BF-D) and the erection of two proposed buildings providing:
- up to 125 residential units; and
 - up to 781sqm (GEA) of flexible Class A1/A3/A4/D1/Sui Generis uses.
52. The proposed development would be constructed in 4 phases as set out in table 1 below:

Table 2 – Phasing

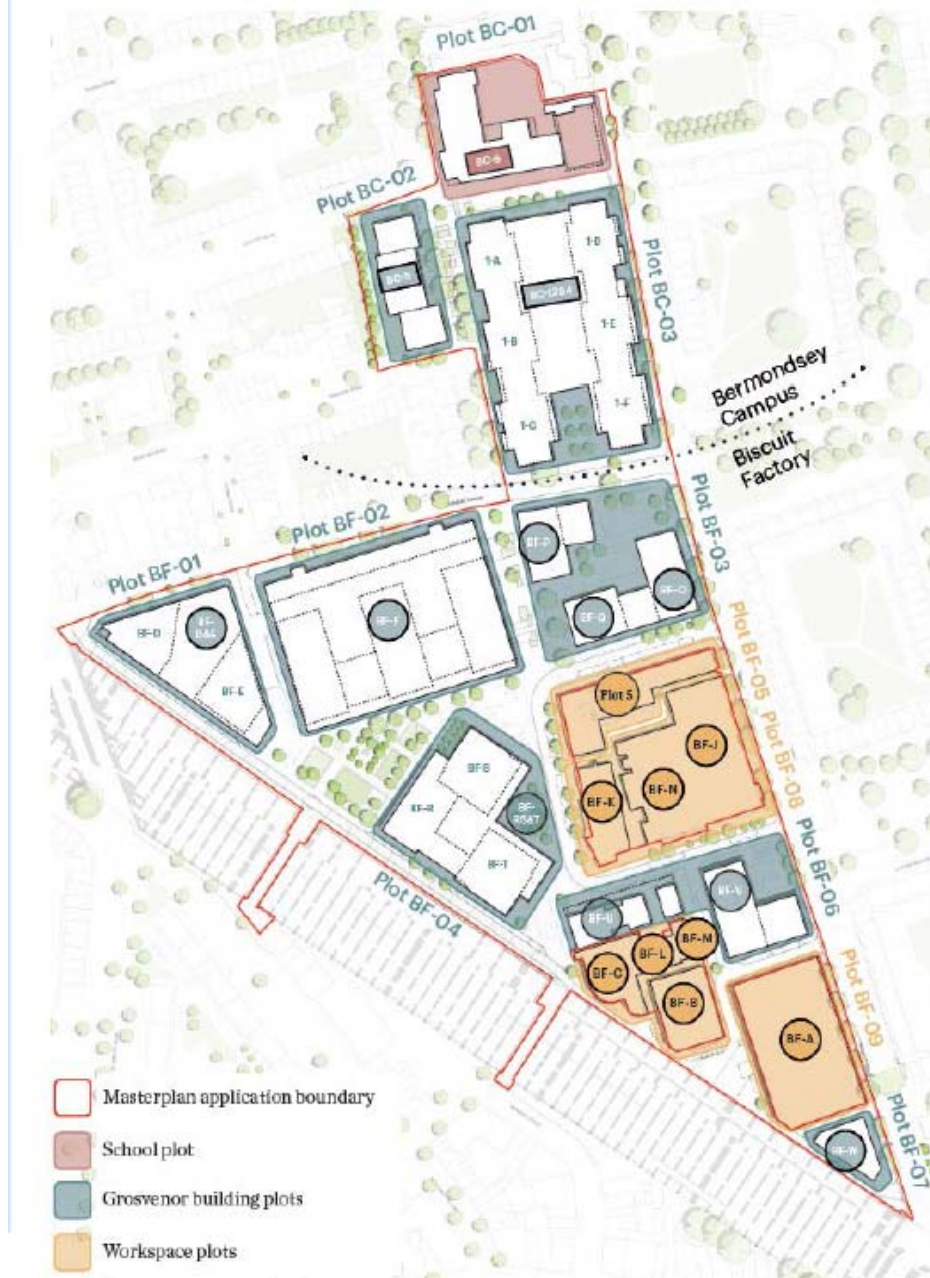
Phase	Buildings to be Demolished	Buildings to be Constructed
1	BF-D (part), BF-E, BC-A, BC-B, BC-F, BF-F (part)	BF-F, BF-RST, BC-6, N Rail Arch
2		BF-D&E, BF-U, BF-V, S Rail Arch
3	BF-G, BF-H	BF-O, BF-P, BF-Q
4	BC-C, BC-D, BC-E, BC-G, BC-H	BF-W, BC-1234, BC-5

Image 4 – Indicative Phasing Plan



53. Details of how the development is laid out across the masterplan site is set out in Image 5 below:

Image 5– Proposed Masterplan layout with Workspace Buildings



54. The applicant's vision for the site is to create a residential-led mixed use development which revitalises an existing underutilised brownfield site and connects it into the surrounding local area. This includes the provision of prominent areas of new public realm, significantly improved permeability through the site by providing new connections through the site and to surrounding areas including the provision of a new pedestrianised section of Keaton's Road improving links with Bermondsey underground station, securing the provision of two new pedestrian routes through the Railway Viaduct, and enhancing the Low-Line route beside the viaduct.
55. The 'Low Line' is a series of pedestrian/cycling routes that are proposed throughout the borough alongside railway arches and viaducts and their associated spaces and streets. The aspiration for the Low Line would be delivered incrementally over the long term with new sections provided as and when development opportunities arise on neighbouring site. The current application site would allow for the provision of a

significant section of the Low Line linking more central areas with areas to the south and east. However the full delivery of this section of the Low Line would be reliant on the agreement of the new owners of the arches.

56. During the course of the application the applicants have submitted revised documents to make the following amendments:

- Reduction in the number of units from 1343 to 1342
- Reduction in height of proposed building BF-Q by one storey (3.125m) from 14 to 13 storeys
- Additional balconies to proposed buildings BF-D&E, BF-OPQ, BF-RST,
- Alterations to elevations of proposed buildings BF D&E, BF-OPQ, BF-RST, BF-W, BC-1234, BC-6
- Alterations to the layouts of proposed buildings BF-D&E, BF-F, BF-OPQ, BF-RST, BC-1234
- Alterations to the mix of residential accommodation
- Minor increase in retail floorspace
- Minor decrease in commercial and community and leisure floorspace
- Alterations to the public realm including the retention of more street trees and amendments to playspace provision
- Amendments to the transport strategy

The application is accompanied by an Environmental Statement (EIA) which has been available on the Council's website throughout the application process.

57. Planning history

<p>11/AP/3749 Application type: Scoping Opinion (EIA) (SCP) Scoping Opinion relating to the retention of approximately 24,500 sqm of business floorspace, demolition of existing buildings totalling approximately 29,000 sqm, and the erection of new buildings providing 7,500sqm of commercial floorspace and approximately 1100 new dwellings in buildings up to 36 storeys in height. Decision date 09/01/2012 Decision: Scoping Opinion - EIA Regs (SCP)</p>
<p>11/AP/3584 Application type: Full Planning Application (FUL) Retention of use as an Arts and Performance Exhibition Centre (Use Class D2). Decision date 24/02/2012 Decision: Granted (GRA)</p>
<p>11/AP/4232 Application type: Full Planning Application (FUL) Change of use of Unit E01B (1045 sq. m) from Storage (Use Class B8) to Indoor Climbing Centre (Use Class D2); installation of a ground floor entrance and a ventilation fan on the roof of the building. Decision date 05/04/2012 Decision: Granted (GRA)</p>
<p>12/AP/2737 Application type: Full Planning Application (FUL) Hybrid planning application comprising:</p> <ol style="list-style-type: none"> 1. Application for full planning permission for the demolition of existing buildings and the erection of a new part 5, part 7 and part 9 storey building (max height 32.125m AOD) fronting Clements Road providing 119 residential units, plus associated highway works, vehicle access, car and cycle parking and landscaping, including all related ancillary facilities (storage, management facilities and plant). 2. Application for outline planning permission (with all matters reserved) for the demolition of existing buildings and the development of a mixed use scheme

<p>providing a number of buildings ranging from 14.08m (AOD) to 32.45m (AOD) in height (approximately 4 to 9 storeys) providing up to 73,000sqm of residential floorspace (up to 681units) and up to 8,240sqm of new commercial floorspace (Use Classes A1, A2, A3, B1, B8, D1 and D2), plus associated highway and public realm works, landscaping, car and cycle parking, and related infrastructure works.</p> <p>Decision date 24/10/2013 Decision: Granted with Legal Agreement (GWLA)</p>
<p>16/AP/0813 Application type: Variation: non-material changes (VNMC) Non-material amendments to planning permission 12-AP-2737 for: 'Hybrid planning application comprising:</p> <p>1. Application for full planning permission for the demolition of existing buildings and the erection of a new part 5, part 7 and part 9 storey building (max height 32.125m AOD) fronting Clements Road providing 119 residential units, plus associated highway works, vehicle access, car and cycle parking and landscaping, including all related ancillary facilities (storage, management facilities and plant).</p> <p>2.Application for outline planning permission (with all matters reserved) for the demolition of existing buildings and the development of a mixed use scheme providing a number of buildings ranging from 14.08m (AOD) to 32.45m (AOD) in height (approximately 4 to 9 storeys) providing up to 73,000sqm of residential floorspace (up to 681units) and up to 8,240sqm of new commercial floorspace (Use Classes A1, A2, A3, B1, B8, D1 and D2), plus associated highway and public realm works, landscaping, car and cycle parking, and related infrastructure works'.</p> <p>Amendments to wording of Conditions 5 (tree protection), 7 (construction management), 9 (landscaping) and 53 (drainage) to allow for the excavation of trenches before the details are required for submission.</p> <p>Decision date 07/04/2016 Decision: Agreed - for app types VLA & VNMC (AGR)</p>
<p>16/AP/5015 Application type: Cert. of Lawfulness - existing (CLE) Certificate of Lawfulness (Existing) to certify that LBS Planning Permission 12/AP/2737 has been lawfully implemented. Decision date 08/02/2017 Decision: Granted (GRA)</p>
<p>17/AP/2884. Application type: Scoping Opinion Scoping Opinion for the redevelopment of the site known as the Biscuit Factory and Campus on Clements Road and Drummond Road, SE16 Decision Date 27/09/2017 Decision: Scoping Opinion Issued (SCP)</p>

Planning history of adjoining sites

Network Rail Arches

58. During the pre-application discussions the applicants advised that the main application for the Biscuit Factory would be submitted concurrently with an application to develop the railway arches and this was confirmed by Network Rail. However on submission of the current application there was no concurrent submission for the Network Rail Arches. Throughout the timescale of the current application officers have been advised that the application for the Arches was imminent but to date it has yet to be submitted. The main reason given for the delay is that Network Rail were not able to submit an application for the Arches as they formed part of their commercial estate portfolio, which has been in the process of being sold over the past 18 months.

59. As confirmed in paragraph 35 above the terms for the sale of Network Rail's property portfolio to Telereal Terillium and Blackstone, have now been agreed. There has been no contact from the new owners regarding the application and it is not clear whether they support the development proposals or whether they would take a different approach to the development of the arches. This also creates some uncertainty with regards to the delivery of the two pedestrian routes through the arches and the enhancements to the Low Line.

Workspace 'Building F'

60. 15/AP/3729. Application type: Full Planning Permission (FUL)
Full planning permission sought for 'Demolition of existing buildings and the erection of a six storey building providing 5576sqm (GIA) of Class B1 office floorspace plus associated highway works, vehicle access, cycle parking and landscaping including all related ancillary facilities (storage, plant and connection to SELCHP).'

Decision Date: 22/03/2016
0203 8715959

Decision: Granted with Legal Agreement (GWLA)

61. 17/AP/4283. Application type: Full Planning Permission (FUL)
Full planning permission sought for 'Part demolition of existing building and erection of a six storey extension with basement, comprising 4,344sqm of office floorspace (Use Class B1) and ancillary cafe; part replacement facade and minor elevational changes to existing building and other associated development including landscape/surfacing alterations.'

Decision Date: 08/06/2018 Decision: Granted with Legal Agreement (GWLA)

KEY ISSUES FOR CONSIDERATION

Summary of main issues

62. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use and conformity with site designation.
 - Environmental impact assessment
 - Affordable housing
 - Mix of dwellings
 - Wheelchair accessible housing
 - Density
 - Design, heritage assets and tall buildings including views
 - Quality of accommodation
 - Trees and landscaping
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area
 - Noise and vibration including impact of railway line
 - Transport and servicing
 - Equality implications
 - Air quality
 - Ground conditions and contamination
 - Water resources and flood risk
 - Sustainable development implications
 - Archaeology
 - Wind microclimate

- Health Impact Assessment
 - Ecology
 - Socio-economic impacts
 - Planning obligations (S.106 undertaking or agreement)
 - Mayoral and Borough community infrastructure levy (CIL)
 - Statement of community involvement
 - Other matters
63. An overall assessment of the merits of the proposal appears at the end of the report.

Legal context

64. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan, the Core Strategy, and the Saved Southwark Plan. The New Southwark Plan and the draft new London Plan 2018 are in the process of preparation, and the report sets out the weight to be attached to these draft plans, as relevant.
65. There are also specific statutory duties in respect of equalities and heritage assets which are highlighted in the relevant sections below and in the overall assessment at the conclusions.

Planning policy

National Planning Policy Framework (the Framework)

66. 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'
67. 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 NSP 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 the relevant paragraphs of this report.

Section 5 - Delivering a sufficient supply of homes

Section 6 - Building a strong, competitive economy

Section 8 - Promoting healthy and safe communities

Section 9 - Promoting sustainable transport

Section 11 - Making effective use of land

Section 12 - Achieving well-designed places

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Section 15 - Conserving and enhancing the natural environment

Section 16 - Conserving and enhancing the historic environment

National Planning Policy Guidance (2014)

The London Plan 2016

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

Policy 2.15 - Town Centres
Policy 2.18 – Green infrastructure: The multifunctional network of green and open spaces
Policy 3.1 - Ensuring equal life chances for all
Policy 3.2 – Improving health and addressing health inequalities
Policy 3.3 - Increasing housing supply
Policy 3.4 – Optimising housing potential
Policy 3.5 - Quality and design of housing developments
Policy 3.6 - Children and young people's play and informal recreation facilities
Policy 3.7 - Large residential developments
Policy 3.8 - Housing choice
Policy 3.9 - Mixed and balanced communities
Policy 3.12 -Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.16 -Protection and enhancement of social infrastructure
Policy 3.18 – Education facilities
Policy 3.19 – Sports facilities
Policy 4.2 - Offices
Policy 4.3 - Mixed use development and offices
Policy 4.4 - Managing industrial land and premises
Policy 4.6 - Support for and enhancement of arts, culture, sport and entertainment provision
Policy 4.7 - Retail and Town Centre Development
Policy 4.8 - Supporting a Successful and Diverse Retail Sector
Policy 4.9 – Small shops
Policy 4.12 - Improving Opportunities for All
Policy 5.1 - Climate Change Mitigation
Policy 5.2 - Minimising Carbon Dioxide Emissions
Policy 5.3 - Sustainable Design and Construction
Policy 5.4A - Electricity and gas supply
Policy 5.5 - Decentralised energy networks
Policy 5.6 - Decentralised energy in development proposals
Policy 5.7 – Renewable energy
Policy 5.9 - Overheating and cooling
Policy 5.10 - Urban greening
Policy 5.1 - Green roofs and development site environs
Policy 5.12 - Flood risk management
Policy 5.13 - Sustainable drainage
Policy 5.17 – Waste capacity
Policy 5.21 - Contaminated land
Policy 6.3 – Assessing the effects of development on transport capacity
Policy 6.9 - Cycling
Policy 6.10 - Walking
Policy 6.13 - Parking
Policy 7.1 - Building London's Neighbourhoods and Communities
Policy 7.2 - An inclusive environment
Policy 7.3 - Designing out crime
Policy 7.4 - Local character
Policy 7.5 - Public Realm
Policy 7.6 - Architecture
Policy 7.7 - Location and design of tall and large buildings
Policy 7.8 - Heritage assets and archaeology
Policy 7.11 – London view management framework
Policy 7.12 – Implementing the London view management framework
Policy 7.14 – Improving Air Quality
Policy 7.19 – Biodiversity and Access to Nature

Policy 7.21 - Trees and woodlands
Policy 8.2 - Planning obligations
Policy 8.3 - Community infrastructure levy

Core Strategy 2011

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

Southwark Plan 2007 (July) - saved policies

70. 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.
71. The Council's cabinet on 19 March 2013, as required by para 215 of the original 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 original 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 original NPPF.

Policy 1.1 - Access to employment opportunities
Policy 1.4 – Employment sites outside of preferred office locations and preferred industrial locations.
Policy 1.5 - Small business Units
Policy 1.7 – Development within town and local centres
Policy 2.2 - Provision of new community facilities
Policy 2.4 – Educational deficiency – provision of new educational establishments.
Policy 2.5 - Planning obligations
Policy 3.1 - Environmental effects
Policy 3.2 - Protection of amenity
Policy 3.3 - Sustainability assessment
Policy 3.4 - Energy efficiency
Policy 3.6 - Air quality
Policy 3.7 - Waste reduction
Policy 3.8 – Waste management
Policy 3.9 - Water
Policy 3.11 - Efficient use of land
Policy 3.12 - Quality in design
Policy 3.13 - Urban design
Policy 3.14 - Designing out crime
Policy 3.15 - Conservation of the historic environment
Policy 3.18 - Setting of listed buildings, conservation areas and world heritage sites
Policy 3.19 - Archaeology
Policy 3.20 - Tall buildings
Policy 3.28 – Biodiversity

- Policy 4.2 - Quality of residential accommodation
- Policy 4.3 – Mix of dwellings
- Policy 4.4 - Affordable housing
- Policy 4.5 - Wheelchair affordable housing
- Policy 5.1 - Locating developments
- Policy 5.2 - Transport impacts
- Policy 5.3 - Walking and cycling
- Policy 5.6 - Car parking
- Policy 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents

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

Greater London Authority Supplementary Guidance

- 73. Housing SPG (2016)
- London View Management Framework (2012)
- London's World Heritage Sites SPG (2012)
- Play and Informal Recreation (2012)
- Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy (2013)
- Affordable Housing and Viability SPG (2017)

Emerging Policy

Draft New London Plan

- 74. 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 Examination in Public commenced on 15th January 2019 and at this stage of preparation it can only be attributed limited weight. However, the emerging policies are referenced by the Mayor in all responses to applications. The Stage 1 report from the Mayor on this application placed weight on the draft London Plan policies in its conclusion on the merits of the case. The following is not a comprehensive list of all policies which are relevant to this application, but an indication of key policies which are referenced in the suggested reasons for refusal, or where they are significant to some of the key considerations in the report.
- 75. GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- SD6 Town centres and high streets
- SD7 Town centres: development principles and Development Plan Documents
- D1 London's form and characteristics
- D4 Housing quality and standards
- D6 Optimising density
- D8 Tall buildings
- H1 Increasing housing supply
- H5 Delivering affordable housing
- H12 Housing size mix

H13 Build to rent
S3 Education and childcare facilities
E3 Affordable workspace

The New Southwark Plan

76. 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. A report amending some of the policies was agreed by the Cabinet on 22 January 2019, and will now be referred to the Council's Assembly, with consultation taking place until 17 May. It is anticipated that the plan will be adopted in late 2019 following an Examination in Public (EIP). As the New Southwark Plan is not yet an adopted plan, it has limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework. The following emerging policy is relevant to this application

Policy SP1 – Quality affordable homes
Policy SP2 – Regeneration that works for all
Policy SP3 – Best start in life
Policy SP4 – Strong local economy
Policy SP5 – Healthy active lives
Policy SP6 – Cleaner, greener, safer
Policy P1 – Social rented and intermediate homes
Policy P4 – Private rented homes
Policy P9 – Optimising delivery of new homes
Policy P12 – Design quality
Policy P13 – Residential design
Policy P14 – Tall buildings
Policy P15 – Efficient use of land
Policy P23 – Education places
Policy P26 – Office and business development
Policy P27 – Railway arches
Policy P30 – Town and local centres.
Policy P31 – Development outside of town centres
Policy P42 – Healthy developments
Policy P44 – Community uses
Policy P47 – Highways impacts
Policy P48 – Walking
Policy P49 – Low line routes
Policy P52 – Car parking
Policy P53 – Parking standards for disabled people and the mobility impaired
Policy P54 – Protection of amenity
Policy P55 – Designing out crime
Policy P60 – Trees

77. Draft proposal site designation NSP10 within the NSP encompasses the entire development site as well as the all of the railway arches between St James Road and Drummond Road. Under the site vision, redevelopment is required to:
- Support new and replacement business space including space for small and medium enterprises (B1);
 - Provide a replacement school (D1);
 - Deliver a mixed use development including at least 1500 homes;

- Provide active frontages with Town Centre Uses (A1, A2, A3, A4, D1, D2);
 - Provide two new routes through viaduct;
 - Provide a new link between Bermondsey underground station and the Biscuit Factory site down Keatons Road;
 - Enhance the Low Line walking route adjacent to the railway viaduct.
78. The guidance states that mixed use redevelopment could include taller buildings subject to considerations of impacts on character, heritage and townscape. It also notes that a retail impact assessment would be required to ensure that proposals would not adversely impact the retail function of The Blue.

Principle of development

79. The redevelopment of an industrial site which has fallen into decline, to provide a new mixed use development with residential, employment and retail uses is welcomed and has previously been accepted in principle when granting the earlier 'Hybrid' planning permission (Ref 12/AP/2737). The land uses proposed are broadly compliant with the site specific designation and would support the NSP vision for Bermondsey.
80. The National Planning Policy Framework (NPPF). The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development to deliver homes, business, industrial units, infrastructure and thriving local places. Paragraph 118 states that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.
81. The site is situated within Inner London and as such the strategic principles of London Plan Policy 2.9 apply. This states that boroughs and other stakeholders should work to realise the potential of inner London in ways that sustain and enhances its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, ensuring the availability of appropriate workspaces for the area's changing economy and improving quality of life and health for those living, working, studying or visiting.
82. The New Southwark Plan vision for Bermondsey states that development should:
- Provide as many homes as possible while respecting the local character, There may be opportunities for taller buildings on key development sites;
 - Improve cycling and walking routes
 - Contribute towards the development of the Low Line, a new public realm corridor adjacent to historic railway arches, with lively accessible spaces for creativity, new jobs and retail;
 - Improve existing and create new cycle and walking routes;
 - Provide flexible workspaces for small and medium enterprises, particularly creative industries to strengthen Bermondsey's reputation as an exciting, vibrant and creative place to work.
83. As such, the redevelopment of this site is consistent with the direction of the NPPF, and the policies of the London Plan and the various adopted and draft documents of the Southwark development plan.

Jobs and businesses

84. Under the Southwark Plan 2007, the site was designated as part of a strategic Preferred Industrial Location (PIL). The council's Employment Land Review (2010)

(ELR) however, recognised that the site includes low grade warehousing space (as well as the higher quality workshop and studio units) which was largely vacant and suffered from insufficient and declining demand. It identified a significant decline in Class B2 industrial uses within the borough and a decline in B8 warehousing floorspace. On this basis, the ELR recommended that the site should be released from its PIL designation. This would enable a mixed use redevelopment to provide residential accommodation and compatible B1 uses. The ELR also recognised the benefits of releasing the site from the PIL cluster in terms of its role as a driver and catalyst in the regeneration of The Blue and the wider surrounding area.

85. The ELR's recommendation for de-designation of the site to enable its mixed use regeneration was reflected in the Core Strategy 2011. The site would not be protected under Southwark Plan Saved policy 1.4 'Employment sites outside the Preferred Office Locations and Preferred Industrial Locations' since it does not lie within any of the areas specifically protected under that policy. Therefore, there are no site or policy designations at the site under the adopted policies which protect the employment uses. In line with national, London and local policies, the need for housing should be accorded significant weight where suitable sites come forward for development.
86. The provision of new business floor space on site is supported in Strategic Policy 10 of Southwark's Core Strategy and the strategic policies of the London Plan and New Southwark Plan, which seek to increase the number of jobs within Southwark. These would usually be directed to the Central Activities Zone (CAZ) or Preferred Industrial Land (PIL) sites, which this site would not fall within. The supporting text for Strategic Policy 10 of the Core Strategy notes that in releasing Tower Bridge Business Complex from PIL the site will be allocated in the emerging development plan documents, for mixed use development, ensuring the retention of business uses on site.
87. The emerging New Southwark Plan Site Specific Allocation NSP10 for the Biscuit Factory and Campus identifies the site as an opportunity site that must deliver a comprehensive mixed use development including at least 1,500 homes as well as supporting new and replacement business floorspace, including space for small and medium enterprises.
88. The proposed development would provide up to circa 12,000sqm of new business floor space within the detailed component. This would predominantly be provided as office workspace within plots BF-D&E and BF-F (11,029sqm GIA) however smaller workspace units will also be provided within plots BF-W and BC-1234.
89. The overall reduction in Class B floorspace is not contrary to any adopted or draft policy at Southwark or at the London level and the proposed development would provide over 12,000sqm of new B1 floorspace. Nevertheless the loss of approximately 15,000 sqm of employment floorspace. would have to be mitigated through the provision of a financial contribution secured in a s106 agreement in the event that planning permission was granted.

Job Creation

90. The submission advises that there are currently 270 employees working on the site. This reflects that level of floorspace which is currently vacant or under-used. Based on HCA Employment Density Guidelines (2015), the proposed development would create 1290 full time jobs (once constructed). This is a net gain of approximately 1020 jobs which is a significant positive aspect of the scheme and is supported by the Councils Local Economy Team (LET) officers.
91. The LET officers have also set out further requirements in order to ensure that this

development delivers employment and training for local people. These would be secured through the Section 106 agreement, if the application were to be approved. . During the construction phase, the development would be expected to deliver sustained jobs to unemployed Southwark residents, short courses, and take on construction industry apprentices. Once the development is constructed, it would be expected to provide sustained jobs for unemployed Southwark residents. If any of these expectations were not to be achieved, a financial contribution would be sought in accordance with the Council's Planning Obligations and CIL SPD. An Employment, Skills and Business Support Plan (construction phase) and a Skills and Employment Plan (operational phase) would also be secured through the Section 106 Agreement, in the event that permission were granted

The Nature of the Workspace Proposed

92. As set out above the workspace proposed is predominantly open plan office floor plates provided on the first and second floors of Blocks F and D&E. A further 3 light industrial work space units are proposed within Plots BC-1234 and BF –W. These units are identified as having mixed use B1/B2. The Council's EPT officers have raised concerns with the proximity of proposed B2 uses in relation to residential uses situated above on each of the plots. Should the application be approved specific conditions would have to be used to restrict the types of uses and control noise levels from these employment uses to ensure that amenity of prospective residents above was protected.
93. The Site Specific Allocation NSP10 requires the provision of new and replacement business floorspace, including space for small and medium businesses. A small business is defined in the NSP as a business with 50 employees or less. The proposed employment floor space is provided as 11,029sqm (GIA) of office floorspace on floors 1 and 2 of plots BF-F and BF-D&E. This office floor space is shown as single office floor plates but the applicants have confirmed that it could also be subdivided to provide a range of unit sizes. Nevertheless its flexible layout means that it could be used as a single large scale office space for one occupant and therefore may not be classed as small business workspace. Thus the proposed development would provide just 608sqm (GIA) of small business workspace in units situated on the ground floor of Plots BC-1234 and BF-W.
94. However the level of provision may be considered acceptable as the site specific designation includes the proposed Workspace buildings and also all of the Railway Arches to the south of the current application site. It is anticipated therefore that additional small business workspace that amounts to over 5292sqm could be provided throughout the rest of the site. The Railway Arches as existing are currently designated as Strategic Industrial Land (SIL) and although many of the arches are unused due to their poor state of repair they have the potential to provide significant employment floor space; this was illustrated in the draft proposals for the Railway Arches drawn up by Network Rail ahead of the proposed sale. Whilst there is currently no certainty about the future of the arch spaces, given this provision and the flexibility of the office floorspace discussed above it is considered that an appropriate level of small business work space could be provided across the wider designated site NSP 10

Affordable Workspace

95. On large scale developments, the Council would normally seek 10% of proposed employment space as affordable workspace. Whilst there is no policy in the Core Strategy or Southwark Plan to support this, the amended Submission version of the NSP at policy P28 requires 10% affordable workspace in major developments

delivering employment space. Grosvenor made no specific proposals to how affordable workspace would be delivered. Initial section 106 discussions did commence with the applicants however in light of wider concerns about the application, these have not progressed towards detailed wording and there has yet to be agreement on specific clauses related to workspace provision. In the event that the Committee was minded to grant permission, clauses to secure affordable workspace should be included in a s106 agreement.

Provision of new retail floor space

96. The proposed development provides 3,975sqm (GEA) of Classes A1, A3 and A4 space specifically identified for retail use across the development site and a further 3,822sqm of flexible space (Use Class A1, A3, A4 and D1) at the ground floor of Building BF-F. The proposed retail would be provided across the development sites with units specified within all plots. These units would have a variety of sizes and would include 10% of the retail floorspace in units of 80sqm or less, in an attempt to provide units attractive to smaller retail businesses. This retail space would have a flexible use class which would give the applicants a high degree of flexibility in terms of the types of uses for which the units could be used. Given that the final mix of uses would not be finalised this has implications for assessing the impact of the proposed development on other retail centres within the borough. This is considered further in the following section.

Retail impact and scale

97. In order to provide the applicant's vision for a mixed use place, the proposals under consideration would incorporate a mix of residential, commercial and community uses as specified above. The non-residential uses would be concentrated on the lower floors of the proposed buildings, where they would contribute to the creation of a vibrant and animated street scene. The breakdown of non residential land uses proposed is set out in paragraph 50 of this report, but to summarise it consists of 24,516sqm (GIA) of non residential floor space, including 7,163sqm (GIA) of A class retail uses, 848 sqm (GIA) leisure uses and 11,637sqm (GIA) of B1 class business uses. As such, a maximum potential 19,266 sqm town centre uses is proposed.
98. In developing their proposals for the site the applicants have engaged with local residents and businesses since they acquired the site in 2013. This has included working with retailers within the Blue shopping centre as well as having an active role in the Bermondsey Business Improvement District (BID) as a board member since 2018. They have also worked in partnership with the BID on a number of initiatives and projects in the local area.
99. A representative of the BID has responded to the consultation confirming their work with Grosvenor. They also provide the following comments:

There are concerns that the addition of a considerable amount of new retail space may have an adverse effect on the Blue and its retail shops but a belief that with Blue Bermondsey BID continuing to work closely with Grosvenor over the ongoing process of the development, it can be ensured that the new commercial and retail uses being proposed will complement rather than compete with existing business in the BID area...

The Blue has long been in need of major investment to combat the growth in neighbouring areas such as Surrey Quays and Old Kent Rd to offer a better visitor experience and enhance the strong community spirit which the area is renowned for. If the ongoing partnerships that have been established continue to function, with the

support of the council and the considerable concerns of local residents addressed and managed, long term benefits on an unprecedented scale can be realised, bringing greater prosperity and a greater sense of community for its businesses, incoming and lifelong local residents.

100. It is the stated intention of Grosvenor that the proposed development would complement the existing retail offer in the local area as the associated increase in residential/worker populations post development and improved connections through the Railway Arches, would bring spin-off benefits for the Blue. The applicants are also proposing a Retail Letting Strategy that would control the types of retail occupants for the site such that they deliver a complementary offer to the Blue. They also consider that the ground floor use for Building BF-F has the potential to attract more people into the local area benefitting other businesses in the local area.
101. The site allocation NSP10 allows for the provision of town centre uses (Use Classes A1, A2, A3, A4, D1, D2) stating that these should be provided at ground floor level enhancing the Low Line route. The Blue is the nearest shopping centre to the site and the Site Specific Allocation is clear that proposals for the site should not adversely impact the core retail function of this shopping centre.
102. The proposed ground floor uses would all fit within the NPPF (2018) definition of Main Town Centre Uses. The NPPF advises that local planning authorities should promote competitive town centres. In addition to this paragraph 86 of the NPPF states that “Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan”. Paragraph 89 of the NPPF states that local authorities should require a retail and leisure impact assessment if the proposed development is not in accordance with an up-to-date plan and where the quantum of retail and leisure uses proposed would be over a proportionate, locally set floor space threshold (if there is no locally set threshold, the default threshold is 2,500 sqm). Paragraph 90 goes on to state that where an application fails to satisfy the sequential test or is likely to have a significant adverse impact, it should be refused. The London Plan (2016) is consistent with the policy guidance of the NPPF.
103. Strategic Policy 3 of the Southwark Core Strategy relates specifically to shopping, leisure and entertainment and aims to maintain Southwark’s network of successful designated town centres. As part of this, the policy identifies a hierarchy of town and local centres, reflecting their size and role in the borough. In the adopted Core Strategy, the Biscuit Factory site is not identified as one of these designated town centres. The Policy then goes on to identify the tests set out in national planning policy and the London Plan for new shopping and leisure space which are proposed outside designated town and local centres.
104. Southwark Plan Saved Policy 1.7 relates to development within town centres, and states that most new development for town centre uses should be accommodated within existing town centres and local centres. Policy 1.8 (Location of retail outside town centres) was not found to be in conformity with the NPPF and was accordingly not saved when the plan was revised in 2013.
105. The applicant’s are proposing that the ground floor commercial units would be situated on all plots across the Masterplan area and would have full flexibility in terms of the uses for which they are seeking consent. These are Use classes A1 (Retail), A3 (Food and drink) and A4 (Drinking establishments). The large ground floor space within Block BF-F would also include Use Class D1 (non-residential institutions) as part of the range of flexible uses sought. As noted above the retention of this building and the scale of the ground floor could result in this space acting as a destination

bringing people into the area.

106. The applicants have submitted a Retail and Leisure Assessment prepared by Quod Consultants. Their assessment has considered a range of scenarios taking into account the different unit sizes proposed and different mix of uses that could occur as a result of the flexible consent sought. The scenario also includes two assessments of which make assumptions regarding the potential redevelopment of the Railway Arches adjacent to the development site. The following scenarios were considered:
- 1 Realistic Case: 3,621 sq.m GIA of A1 retail and 3,844 sq.m GIA of A3/A4 F&B
 - 2 Realistic Case + Bermondsey Arches
 - 3 Maximum Parameters (retail): 5,929sq.m GIA of A1 retail
 - 4 Maximum Parameters (F&B): 6,129sq.m GIA of A3/A4 F&B
 - 5 Maximum Parameters (retail) + Railway Arches Maximum Parameters
 - 6 Maximum Parameters (F&B) + Railway Arches Maximum Parameters
107. The realistic case assumes an even split of the commercial units between Class A1 (retail) and Class A3/A4 (Food and Beverage) uses. The maximum parameters scenarios assume the maximum area is used by the specified use, either retail or food and beverage. Scenarios 5 and 6 also consider the impact of the specified parameters with a notional scheme for the Railway Arches which also includes similar maximum parameters.
108. They have not undertaken a sequential test but their retail impact analysis considers the impact on existing, Major, District and Local shopping centres within Southwark. The conclusion of the assessment is that both the realistic case and the worse case scenarios would only result in minor reductions in trade and investment in the identified retail centres in Southwark. Given the specialist knowledge associated with this topic this assessment has been reviewed externally on behalf of the Council by retail consultants at Lichfields Associates
109. Lichfields have undertaken a sequential test considering whether there were any preferable sites in local town centres or edge of town centre locations. They note that there would not be any sites within The Blue that could accommodate the proposed development. Canada Water is a location where there could be sites given the wider masterplan proposals for the centre. However given the long term nature of the Canada Water masterplan (15-20 years), and that British Land are also proposing large scale retail uses here, it would appear that sites would not be available within the same time period as the current application proposals. Lichfields therefore conclude that there are no sequentially preferable sites for the retail proposed.
110. Lichfields undertook a review of the Retail and Leisure Assessment prepared by Quod, and in doing so have also prepared their own retail impact assessment. Their analysis differs from that of Quod as Lichfield assume that the proposed development would have a greater potential turnover and have considered the impact of outstanding commitments (consented new retail space in the catchment area) when assessing the cumulative impact on neighbouring shopping centres. Nevertheless the conclusion of the report is agreed with the applicants that subject to appropriately worded conditions, which the applicants agree to, the proposed development should have an acceptable impact on neighbouring centres including the Blue.
111. Lichfield's prepared their own impact assessment based on the draft Southwark Retail Study Update and tested a number of scenarios based on the level and types of retail which may emerge given the flexible nature of the uses sought. The assessment also compared the impact of the proposed development in conjunction with the potential impact of a notional planning application for the Railway Arches. Officers have seen

draft application information for the proposed Railway Arches, however this application has yet to be submitted). Lichfield's assessment looked at the impact of the various scenarios on the six main shopping centres within Southwark. These are:

Elephant and Castle/ Walworth Road
Bankside/Borough/London Bridge
Surrey Quays/Canada Water
The Blue
Old Kent Road
Peckham

112. Lichfield's retail impact assessment confirmed that some of the scenarios tested would result in trade diversion from the town centres of Surrey Quays/Canada Water, Elephant and Castle/Walworth Road and the Local Centre at The Blue. The impacts on Surrey Quays/Canada Water and Elephant and Castle/Walworth Road are not considered to be significant as Lichfield's cumulative impact estimates that this will be offset by expenditure growth between 2017 and 2022. In relation to Surrey Quays/Canada Water it is noted that based on the information available and likely timetable and phasing and development at Canada Water, the short term impacts of the Biscuit Factory proposals are unlikely to jeopardise or significantly delay planned investment at Canada Water.
113. Lichfields considered the impact on The Blue in detail. The Blue is the shopping centre closest to the proposed application site. The base year (2017) turnover is £38.24 million which is split as follows for the different retail sectors:
 - Convenience goods £16.19 million (42%)
 - Comparison goods £10.54 million (28%)
 - Food/beverage £11.51 million (30%)
114. This breakdown suggests convenience goods shopping and food/beverage outlets are the most important elements of the centre's offer and vitality and viability. The turnover of The Blue is projected to increase from £38.24million in 2017 to £46.73 million in 2022, due to population and expenditure growth, but planned commitments (i.e consented new retail space in the catchment area), not including the proposed development will reduce this turnover growth to £43.52 million. Thus even with taking into account planned commitments there would be growth in turnover.
115. Lichfields then assess the impact of six different scenarios on the Blue similar to the scenarios tested by Quod. Lichfields highlight that the scenarios with the biggest impact on the Blue would be the realistic case with Railway Arches and maximum retail (assuming all commercial space occupied as retail) with the railway arches redevelopment. The greatest impact is likely to be on the provision of convenience goods sector.
116. There is agreement between the consultants that the proposed development would provide some spin off benefits with the increase in residents and employees on the site and an increase in visitor numbers to the site generating additional turnover for businesses in the Blue through linked visits. However this is very much predicated on the pedestrian tunnel links through the arches being secured and delivered as part of the planning application.
117. As such Lichfields recommend that the parameters proposed by the applicant be imposed to ensure that there is no detrimental impact on the Blue. These parameters are:
 - Class A1 to A4 floorspace should not exceed 6,838 sq.m GIA;

- Class A1 floorspace should not exceed 5,929 sq.m GIA;
- No Class A1 unit outside Building F to exceed 500 sq.m GIA;
- Class A3 to A4 food and beverage floorspace should not 6,129 sq.m GIA;
- Building [F] not to be used as a single A1 shop unit or a national multiple food store;
- No multiple food store should be provided.
- No poaching of retailers from the Blue unless there is a commitment to retain presence in the Blue.

118. The level of retail proposed within the development is significant in a location which is not within a defined shopping centre and this in conjunction with the potential redevelopment of the railway arches could have a detrimental impact on the vitality and viability of The Blue local shopping centre. Officers suggested reducing the quantum of retail development and increasing B classes to reduce retail impact but this was not agreed with the applicant, who consider the proposed retail offer to be an important part of the place making effect of the proposal.
119. The applicants have agreed to the proposed parameters for the conditions or s106 clauses, although these have not been worked up in detail. In their absence the development would have a detrimental impact on the vitality and viability of The Blue Local Centre, and so in the event an application was to be approved, this should be subject to a s106 agreement and conditions to secure the required limitations and projects.

Links to The Blue local centre

120. As set out above the proposed development is situated close to but outside of The Blue Local Centre in terms of actual distance from the site. However the existing pedestrian routes from the site to The Blue are not direct and pass under tunnels through the existing viaduct and adjacent to the busy vehicular routes of Drummond Road and St James Road.
121. One of the key requirements of the Site Specific Allocation is the provision of two new links to the Blue under the railway viaduct. The proposed development would allow for the creation of two new links to The Blue, which would link to the proposed areas of public realm within the application site. However there is some uncertainty with regards to the delivery of these links. The applicant has stated that they have a deed in place for the southern arch and have detailed agreed heads of terms in place with Network Rail for the second arch. They have also stated that they have been in contact with the preferred bidder to talk through the proposals. These links would need to be delivered to ensure that The Blue would receive suitable spin off effects from the proposed development; at present the applicant cannot guarantee that the routes can be delivered as part of this scheme, and this uncertainty underlies the suggested reason for refusal number 4.

Provision of Replacement School

122. A key aspect of the development is the replacement of the existing Compass Secondary School. This will be re-located from the existing facilities on the Campus Site and a new purpose built school building will be re-provided on the northern most part of the site with frontages onto Keeton's Road, Drummond Road and a new pedestrian link route between these roads. The school has been designed in response to the specific needs of the Compass School, which has a house based teaching structure providing four form entry secondary education, including sixth form, for up to 600 pupils. The Headteacher of the school has been involved in discussions

with the Council, and the Design Review Panel included a representative with extensive experience of designing new school buildings. In addition to this the Parliamentary Under Secretary of State for the School System, Lord Agnew, has written to the Council expressing his strong support for the school element of this development and to highlight the impact of a delay and/or refusal of the application on the school.

123. Paragraph 94 of the NPPF states that the Government attaches great weight to ensuring a sufficient choice of school places and states that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement. It advises that great weight should be attached to the need to create, expand or alter schools.
124. Policy 3.18 Education facilities of the London Plan 2016 confirms the Mayor would strongly support the provision of new schools. Strategic policy 4 – ‘Places to learn and enjoy’ of the Core Strategy, supports the building of new schools and improving of existing schools to provide improved education opportunities, and states that schools will be protected where there is a long-term need. Saved policies 2.2 ‘Provision of new community facilities’ and 2.4 ‘Educational deficiency – provision of new educational establishments’ of the Southwark Plan 2007 support the provision of new and improved educational and community facilities. It should also be noted that there is a policy requirement to re-provide the school as part of the development.
125. The Compass School opened in 2013 and currently occupies buildings which were previously used by the Lewisham and Southwark College. However the buildings are in a poor existing condition and the configuration does not support the teaching aspirations of the school. The school are concerned that the current condition is deterring prospective parents from selecting this school for their children. The Department for Education (DFE) considered the existing buildings housing the Compass School always as a temporary solution. Therefore the DFE agreed to fund the replacement school even though the proposed replacement school would be on a smaller site.
126. The new school building is located around the boundaries of the site, creating a secure edge that maximises the provision of safe recreational space as well as an active, secure frontage to Keeton’s Road and Drummond Road. The heights range up to 6 storeys. An elevated sports hall, rooftop MUGA and other external amenity spaces for students, including a ground level playground, are proposed totalling 3,800m² of amenity space in a variety of locations. The main entrance for staff and visitors is located on Keeton’s Road and a new east west link from Keeton’s Road to Drummond Road is proposed for use by the school and to allow pupils to arrive from the east and west.
127. The new school would work on a “vertical house” system which assumes that pupils would stay in one location for most lessons and teachers move, to allow for a more efficient layout and maximise teaching time. The redevelopment of this existing school site for continued educational purposes, to provide a new purpose built facility for Compass School is therefore strongly supported in principle by local, regional and national planning policy.
128. The replacement school has been designed to ensure that the school would meet teaching requirements and space standards set out by the DFE guidance (Building Bulletin 103). Although the Local Planning Authority does not have minimum space standards for schools it was confirmed by the DFE and Southwark’s Design Review Panel that the replacement school would provide a good quality of accommodation for current and future users of the premises. This was confirmed by Lord Agnew in his

letter of support for the school. In addition to this the GLA, in their Stage 1 comments, noted that the proposal to deliver a high quality educational facility for the Compass School is strongly supported.

129. Sport England have objected to the development on the grounds that the school Sports hall would be too small to cater for the need that arises from the projected increase in local population. The applicants have responded to this objection, and officers are of the view that the proposal includes an increase in sports facilities within the school, for which public access could be secured, and the constraints of the site are such that accommodating a larger sports hall could result in harm to the amenity of neighbouring residents.
130. In relation to the school design, Southwark's Design Review Panel raised issues that:
 - the cladding to the staircases appeared solid and, due to their orientation, were visually prominent;
 - the cladding of the six-storey block would be too prominent;
 - the railings to the rooftop MUGA would be too prominent; and
 - the landscaping required further development.
131. The applicant has responded to these concerns through revisions to the proposed development. The revised design is discussed in full within the design section of this report.
132. In line with saved policy 2.2 of the Southwark Plan, which requires that provision is made to enable new facilities to be used by all members of the community, the school has indicated that the sports facilities will be made available for community uses outside the hours of the school's operation. Further details of this operation would usually be sought by condition.
133. The new purpose built school constitutes a very positive aspect of the overall proposal, which should be accorded significant weight when determining the application. If received as a separate 'stand alone' application it is likely that the school proposals would have been strongly supported. However as part of a single application these benefits must be weighed against other impacts of the wider scheme.

Provision of housing

134. The scheme would provide 1342 new residential units. There is a pressing need for housing in the borough. The adopted London Plan (2016) requires the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. Strategic Policy 5 of the Core Strategy 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. This is echoed by emerging policy in the draft new London Plan and NSP. The proposal would make a sizeable contribution to the borough's housing stock although there are concerns with the level of affordable housing proposed.
135. The proposed residential accommodation would all be provided as Private Rental Sector accommodation to be built, let and managed by the applicants, this type of accommodation is also referred to as Build to Rent within the NPPF and defined as:
136. *Purpose build housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer*

longer tenancy agreements and will typically be professionally managed stock in single ownership and management control

137. This model of development differs from a traditional for sale scheme and is noted in the New London Plan that it has the potential for accelerating the delivery of new housing as they are less concerns with market saturation of new homes and they are considered to be less impacted by house price downturns. The applicants have confirmed that the homes provided would be integrated across the neighbourhood under unified ownership and management and unified by Grosvenor's intention to own and professionally manage the development for the long term. This would include the affordable housing which would be delivered as Discounted Market Rent (DMR) accommodation.
138. The number of residential units proposed is significant and would make a sizable contribution towards achieving the Council's housing target over the plan period. It is lower than the 1500 homes expected under the site designation NSP10, but the massing on the site would mean that this number would not be achievable unless other employment or retail uses were reduced. The assessment of the affordable housing offer is set out in paragraphs 166 to 205 below.

Other D class uses

139. 922sqm of flexible D1/D2 floorspace would be provided on plots BC-1234 and BF-OPQ. These units are situated close to the proposed large play space on plot BF-OPQ and are intended to provide uses which could include community/multi-arts performance space. These uses are welcomed and supported within NSP10 and would be secured with a community use agreement within the section 106 if the application were to be granted.

Summary on land use

140. The proposed development would deliver a number of key development plan objectives for the area in accordance with NSP10 and the vision for Bermondsey. This includes the provision of a mixed use residential led development that also includes flexible employment space, retail and community uses. The provision of new employment space and a significant number of housing units would be particularly welcomed, and the provision of less than the required 1500 homes is justified given the constraints preventing additional height or massing. The residential accommodation would be provided as PRS, which would also be welcomed subject to a policy compliant affordable housing contribution and the housing providing a high quality of accommodation. The replacement school is welcomed and the phasing plan proposed would ensure that education provision would be sustained throughout the construction process. The level of retail provision proposed is high outside of a designated town centre and in the absence of specific conditions and section 106 obligations to limit the size and types of retailer and a no-poaching clause for existing businesses within The Blue, the development could have a detrimental impact on the vitality of neighbouring town centre particularly the local centre at 'The Blue'.

Environmental impact assessment

141. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether they constitute Schedule 1 (mandatory) or Schedule 2 (discretionary) development in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. In this case the proposed development falls under Schedule 2, Category 10b 'urban development project' of the EIA Regulations where the threshold for these projects is development

including one hectare or more of urban development which is not dwellinghouse development, development including more than 150 dwellings, and development where the overall area of the development exceeds 5 hectares. The development would provide more than 1 hectare of development which is not dwellinghouse development, and would provide more than 150 dwellings. Notwithstanding this, an EIA is only required if it is likely to generate significant environmental effects having regard to the criteria set out in Schedule 3 of the Regulations, which include:

- the characteristics of the development;
- the environmental sensitivity of the location; and
- the characteristics of the potential impact.

142. It is considered that the proposed development would generate significant environmental effects based upon a review of Schedule 3, and therefore an EIA is required.

143. Prior to the submission of the application the applicant requested a formal 'Scoping Opinion' under Part 4 Regulation 15 of the EIA Regulations 2017, to ascertain what scope and level of detail of information the Local Planning Authority would require to be provided in the Environmental Statement (ES) (application reference 17/AP/2884). Part 5 Regulation 18 of the same regulations requires the ES to be based on the most recent scoping opinion issued.

144. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES including any further information, together with any representations made by consultation bodies and any other person about the environmental effects of the development.

145. The ES must assess the likely environmental impacts at each stage of the development programme, and consider impacts arising from the demolition and construction phases as well as the impacts arising from the completed and operational development.

146. The submitted ES comprises the Main Text and Figures, Technical Appendices, Townscape, Visual and Built Heritage Assessment, and a Non-Technical Summary. It details the results of the EIA and provides a detailed verification of the potential beneficial and adverse environmental impacts in relation to the proposed development, including the following areas of impact (in the order that they appear in the ES):

- Socio Economics
- Archaeology
- Transport and Accessibility
- Air Quality
- Noise and Vibration
- Daylight, Sunlight, Overshadowing and Solar Glare
- Wind
- Cumulative Effects
- Townscape, Visual and Built Heritage Assessment (ES Volume 2)

147. In assessing the likely environmental effects of a scheme, the ES must identify the existing (baseline) environmental conditions prevailing at the site, and the likely environmental impacts (including magnitude, duration, and significance) taking account of potential sensitive receptors. It further identifies measures to mitigate any adverse impacts, and a summary of potential positive and negative residual effects

remaining after mitigation measures included in the ES in order to assess their significance and acceptability.

148. The impacts of the proposed development are expressed as:

- Adverse – detrimental or negative; and
- Beneficial – advantageous or positive.

149. In terms of the significance of the effects, the ES describes these as:

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

150. Local effect means affecting neighbouring receptors and wider effects are considered on a district (borough) and regional (Greater London) level. Effects on other parts of the country or England as a whole are considered as national level, and abroad is considered as 'international' level.

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

152. To facilitate the assessment of this and in recognition of the specialist issues associated with the ES the Council instructed external consultants Land Use Consultancy (LUC) in association with a range of specialist consultants to provide a critical review of the ES and the addendum submitted by the Applicants. LUC's review has considered the original ES and the provision of additional information in response to queries and following the amendments to the proposal. They have concluded that the ES contains all the required information

Alternatives

153. Schedule 4 of the EIA Regulations sets out the information that is required for an ES, which includes an outline of the main alternatives considered. The ES considers two alternative options which are the 'no development' alternative and 'alternative designs'

154. The 'no development' alternative

155. This option would leave the site as it currently exists. This was not considered to be a preferable option by the applicant and the ES advises that without redevelopment, the site would be likely to remain under-used and would result in a number of missed opportunities for the site and the wider opportunity area including:

- No delivery of housing and employment opportunities in accordance with emerging planning policy objectives;
- No community facilities such as new purpose-built school;
- No improvement in neighbourhood connectivity and permeability;
- No improvement in public realm or creation of open space;
- No improvement in biodiversity;

- No improvement to contaminated ground conditions;
- No improvement in the sustainability of the on-site uses in respect of water use, carbon emissions, energy use, traffic emissions; and
- No improvement in neighbourhood security.

156. In light of this the 'No development' scenario has been discounted by the applicant.

Alternative designs

157. The ES advises that the current design approach was adopted by the applicants following design evolution processes which considered the extant planning permission and two other alternative design scenarios for the site. It was concluded that the extant planning permission was not a suitable option as:

- a more open residential environment aligned with the Applicant's aspiration of creating an integrated and inclusive neighbourhood could be created;
- closed courtyards and long façades that create large impenetrable urban blocks could be avoided;
- connectivity to the west and south-west could be improved;
- connectivity to Bermondsey Underground Station could be improved;
- a more varied building typology height could be achieved; and
- a more varied and modulated public realm could be possible.

158. Of the two alternative design scenarios considered scenario 1 proposed a layout that contrasted with the surrounding linear layouts of the housing blocks to the east of the site by providing a layout of angular blocks ranging in height from 4 to 30 storeys. In this scheme none of the existing buildings would have been retained. This option was excluded because it resulted in a pattern of public realm spaces and streets which would have been difficult to integrate into the surrounding context, while also resulting in a large proportion of homes adjacent to the railway. Scenario 2 proposed a layout that integrated more with the surrounding context and retained a substantial part of the Existing Building BF-F. This option was selected as the appropriate scenario to develop and an iterative design process was undertaken with input from Council Officers, the GLA, the local community, the Design Review Panel and Network Rail. A range of alternative options were considered which have led to the final detailed design proposals of the proposed development.

Cumulative developments

159. Chapter 13 of the ES considers the likely cumulative impacts of the development during the demolition and construction and completed and operational phases of the development. Two types of cumulative effect have been considered; inter-project effects are those that result a combination of effects from the proposed development and other developments in the surrounding area which when considered in isolation could be insignificant, but when considered together could result in a significant cumulative effect and intra-project effects which are the combination of individual effects from the proposed development on a particular receptor, such as noise, dust and visual impact.

160. The ES concludes that there is the potential for intra-project cumulative effects during the demolition and construction stage in relation to noise, vibration, air quality and transport. The combined cumulative effects have the potential to affect existing commercial residential and pedestrian receptors in close proximity to the demolition and construction works, as well as pedestrians and cyclists and occupants of early completed phases of the Proposed Development. However appropriate mitigation measures would reduce the potential for significant cumulative effects.

161. The overall conclusion of the ES is that for the majority of environmental impacts, the residual effects of the proposed development (demolition, construction, and operational phases) following mitigation would be insignificant. However, there are likely to be some adverse minor effects, particularly during the demolition and construction phases and traffic related long-term effects from the completed development. The impacts have been categorised as follows:

162. Significant Adverse effects would be likely in respect of:

- Daylight losses at 23 surrounding residential receptors;
- Sunlight losses at 12 surrounding residential receptors;
- Overshadowing of two surrounding private gardens; and
- Solar Glare at eight viewpoints.

The LUC's report on the ES states that no mitigation measures are proposed for the impacts on daylight, sunlight, overshadowing or light pollution on the basis that alternative scheme proposals were considered during the pre-application design development, with changes made to so as to reduce the potential effects. The solar glare effects that have been identified will be mitigated during detailed design of the facades, which could comprise use of non-reflective materials, fins or louvres, to reduce or obscure solar reflected glare.

163. Significant Beneficial effects would be likely in respect of:

- Housing delivery;
- Education provision;
- Employment generation;
- Additional spending by the new residential and employee population; and
- Improvement of pedestrian and cyclist delay, amenity, fear and intimidation.

Temporary, short to medium term beneficial effects

164. The creation of up to 1200 construction jobs over the approximate 8-year construction period.

165. Officers have taken into account the information in the ES, together with consultation responses received following public consultation on the application along with the review of the ES undertaken by LUC on behalf of the Council. It is recognised that there would be adverse impacts upon neighbouring properties in relation to daylight, sunlight and overshadowing. These adverse impacts must therefore be weighed in the balance with all of the other benefits and dis-benefits arising from the application, and Members are referred to the conclusion to this report which draws these issues together.

Affordable housing

Introduction

166. All housing within the development would be within the private rented sector (PRS), which is also sometimes referred to as Build to Rent (BTR), and owned and managed by Grosvenor for the long term. Grosvenor's offer of affordable housing is described by Grosvenor as 27.5% of the units (measured by habitable rooms) as affordable. More accurately, since the affordable offer is for 976 of the 3566 habitable room to be affordable, this equates to 27.37%. This was rounded up by Grosvenor in the submitted documentation. For the sake of accuracy, the figure of 27.37% is used throughout this report.

167. All of the affordable units would be delivered as Discount Market Rent (DMR), at an

average discount of 25% below market rates. In policy terms, this is an intermediate form of affordable housing. The application states that the depth of discount across the affordable units could vary, with greater discounts offered on some units, but this would require higher rents (up to 80% of market rents) on others to ensure that the overall level of discount does not exceed 25% overall. Grosvenor has described the sum equating to a 25% discount as the 'subsidy pot' and suggested whilst this could be distributed in a variety of ways, the impact of the DMR cannot exceed the financial value of that 'subsidy pot'. The impact of this is explained further at paragraph 207 below.

168. The level of affordable housing offered has not changed since the submission of the application on 23 October 2017.
169. In terms of the quality and management of the PRS housing, the development would comply with many, but not all, of the requirements of the relevant policies of the NSP and London Plan.
170. The application was accompanied by a full financial viability appraisal prepared by consultants DS2. The appraisal has been assessed on behalf of the Council by expert surveyors at GVA who have concluded, following lengthy and detailed negotiations, that the applicant's offer is not the maximum amount of affordable housing that the scheme could viably support. It is therefore recommended that planning permission be refused because the affordable housing provision does not accord with policies in the NPPF, the London Plan and Southwark's saved Southwark Plan and Core Strategy policies, which all require housing developments to maximise the provision of affordable housing. The mix of affordable housing also does not align with the tenure split for PRS housing set out in the amended Submission version NSP policy P4 'Private rented homes', or draft London Plan policy H13 'Build to Rent'.

Policy Summary

171. Private rented housing is a relatively new form of housing tenure, and adopted policies in the Southwark Plan and London Plan do not specifically reference this type of housing. In summary the NPPF and the various documents of the development plan set out the following requirements:
172. The NPPF requires Local Planning Authorities to boost the supply of homes, and to assess the size, type and tenure of housing need for different groups in the community, specifically referring to those who require affordable housing and people who rent their homes. Paragraph 64 states that planning decisions should expect at least 10% of homes to be affordable, but notes that exemptions to this 10% requirement should be made where the proposed development provides solely for Build to Rent homes
173. **London Plan 2016** at policy 3.8 sets out the requirement for developers to ensure a genuine choice of homes that are affordable and meet the requirement for different sizes and types of dwellings. In particular it states that boroughs should ensure that positive and practical support to sustain the contribution of the Private Rented Sector (PRS) is provided in addressing housing needs and increasing housing delivery. Policy 3.10 defines affordable housing by reference to Social Rented, Affordable rented and intermediate housing to eligible households whose needs are not met by the market. The supporting text to policy 3.10 states that 'Increased provision of intermediate housing is one of the ways in which the supply of affordable housing can be expanded'
174. The Mayor's Affordable Housing and Viability SPG provides additional guidance on

Build to Rent (PRS) developments recognising that they differ from the traditional Build for Sale model - the documents refer to this as the 'distinct economics' of the sector. The SPG recognises that Discount Market Rent is an appropriate tenure within PRS developments and considers that the rent level for DMR should be pegged at London Living Rent levels, for households with incomes up to £60,000. The guidance requires affordable housing to be secured in perpetuity, and in addition requires a clawback mechanism if the wider PRS homes are sold out of the Build to Rent sector within 15 years. The clawback is intended to respond to the different financial model applied to the PRS sector and to ensure the developer does not benefit financially if the homes are converted to market sale.

175. The draft new London Plan 2017 in policy H13 specifically recognises Build to Rent as a means to provide affordable housing, and requires boroughs to take a positive approach to the Build to Rent sector. It states that the policy on BTR has been developed in recognition of the financial implications of providing build to rent rather than housing for sale. The policy allows all of the affordable housing offer in BTR schemes to be solely Discount Market Rent at a genuinely affordable rent, with a stated preference for London Living Rent levels. To qualify as BTR/PRS the policy sets out a series of criteria relating to the quality and management of the development. These criteria are discussed further at paragraph 185. The new London Plan omits reference to DMR for households on incomes of £60-90,000, effectively signalling that the needs of these household should be met by shared ownership, or market housing.
176. The **Core Strategy policy SP6** requires that a minimum 35% affordable housing is provided on all residential developments of 10 or more units, with a tenure split in the Bermondsey area of 70:30 social rent: intermediate homes. Applications would be subject to viability assessments if policy compliance is not being offered, with the expectation that as much affordable housing will be provided as is financially viable. The Core Strategy makes no specific reference to PRS housing.
177. **Saved Southwark Plan policy 4.4** contains the same requirement for 35% affordable housing at a 70:30 split, but makes no specific reference to viability, and does not mention PRS as a housing type.
178. The Core Strategy and Southwark Plan will in due course both be replaced by the New Southwark Plan (NSP). A submission version of the NSP was subject to consultation between December 2017 and February 2018. The consultation responses have been analysed by officers, and a report was submitted to the Council's Cabinet on 22 January 2019 which agreed minor revisions to a number of policies, including the key policy relating to PRS housing.
179. The submission version NSP includes policy P4 'Private rented homes' which gives general support to the option of PRS, recognising that it can make a contribution to meeting the housing needs of residents who cannot afford to buy private homes in Southwark. The policy states that the sector has the potential to provide higher quality and professionally managed accommodation, with a greater level of security for tenants with minimum 3 year tenancies. It requires the affordable 'DMR' housing to be secured in perpetuity, and the overall housing development to be secured within the rental sector for at least 30 years
180. In the 2017 submission version of the NSP, which was in place at the time the application was submitted, policy P4 required at least 35% affordable housing and set out requirements for the tenure split of the affordable units as a proportion of the overall total. In the Proposed Submission Version: Amended policies January 2019, which was agreed by Cabinet on 22 January, will be referred to Council Assembly,

and be out for consultation until 17 May, policy P4 was amended to remove the requirement for affordable rented homes for incomes between £60,000 and £90,000 per year. The amended policy increases the percentage of social rent and London Living Rent equivalent homes to 15% and 20% respectively. This is to assist in meeting the Council Plan commitment to deliver 1,000 London Living Rent homes by 2022. The omission of the category for £60-90,000 incomes is consistent with the new London Plan. The tenure split in the 2017 and January 2019 Submission versions of the NSP are set out in Table 3 below.

Table 3 -

	2017 Submission Version NSP policy P4		Amended policies of the NSP January 2019 policy P4	
Tenure	% of total housing	% of affordable housing	% of total housing	% of affordable housing
Private rent	65%	0	65%	0
Social rent equivalent	12%	34%	15%	57%
Affordable rent capped at London Living rent equivalent	18%	52%	20%	43%
Affordable rent for households with incomes between £60k and £90k	5%	14%	0	0

181. There were a number of formal objections to original submission version of policy P4, including a substantial objection from Grosvenor. Grosvenor in their representation supported some elements of the draft policy, but raised a number of substantial concerns including to the requirement for BTR being always of the same quality as build for sale, to the requirement for a 30 year covenant term, and to the assumption that schemes should provide 35% affordable housing. They referred to their own analysis which they suggested demonstrated a clear trade off between the quantum of affordable units and the depth to which rents can be discounted.
182. The number of objections to the previous version of the policy means that it can be attributed little weight in decision-making. It could be assumed that similar objections will be submitted to the amended submission version, with the potential for additional objections to the removal of the £60-90,000 income bracket. However, the emerging policy is in many respects consistent with the draft London Plan 2017, although it is noted that this is also unadopted and subject to outstanding objections. In the absence of an adopted policy dealing specifically with PRS/BTR housing, and given the evidence base which sits behind the policy, it is recommended that the requirements of amended Policy P4 in the submission version of the NSP can be given some weight in reaching a decision on this planning application. The weight which can be attributed will increase as the NSP moves further through the adoption process, including the Examination in Public, expected to be late in 2019. In any case, the broad requirement to provide the maximum reasonable amount of affordable housing is consistent in adopted policies of the Council and the GLA.

The Applicant's affordable housing offer

183. As stated in paragraph 166 above, the applicant has offered 27.37% affordable housing, based on habitable rooms, with an average discount of 25% below market rents (ie rents payable of up to 75% of market rents). This would equate to 976 habitable rooms, or 322 of the 1342 homes. Grosvenor have suggested that they

would be willing to discuss a range of options for the affordable rents, so long as the total impact on viability did not exceed the impact of the 25% average discount. A greater 'depth of discount' (ie lower rents) would result in a reduced percentage of homes being offered, and the inclusion of social rented homes would mean that other DMR units would have to be at a price accessible only to those in the income bracket £60-90,000.

184. For the purposes of the appraisal, the applicant assumed the following average weekly rents for the flats:

Table 4 – Applicants' weekly rent assumptions

Unit type	Rent per week incl. service charges and fees	
	Discount Market Rent units average rents	Private market rent units
Studios	N/A	£384
1 bed	£348	£469
2 bed	£402	£526
3 bed	£437	£695

Quality and management of the housing

185. The draft new London Plan, and the revised submission version of the NSP set out criteria that development of PRS/BTR housing must comply with in order to be acceptable. The table below sets out these criteria and indicates the extent to which the Grosvenor scheme complies with each.

Table 5 – Criteria for PRS/BTR

Criteria	London Plan	NSP	Compliance?
Scale	At least 50 units	More than 100 units	Yes
Management	Unified management and self-contained units. On site management and complaints procedure.	Security and professional management	Yes
Mix	Mix should be applied flexibly in BTR schemes near transport nodes and town centres.	Mix reflecting local need	Non-standard mix, some limited evidence of need provided. GLA support the proposed mix.
Tenancy length	3 years or more, tenants able to give 1 months notice after first 6 months	Minimum 3 years, 6 month break clause for tenants	Yes – 3 year Assured Shorthold tenancies
Rent and service change certainty	Annual rent increases must be agreed in advance and formula linked. No upfront fees other than deposits	Limited in-tenancy rent increases agreed in advance	Yes, rent increases during tenancy capped at CPI +1%
Coven-	DMR in perpetuity, PRS	PRS covenant	Offers 90 year

ant	covenant for 15 years, and clawback mechanism if covenant broken	of 30 years, with clawback mechanism if sold early	covenant for DMR but only 15 years covenant for PRS. Compliant with London Plan but not NSP.
Viability review	Requires early and late stage reviews.	Viability review to increase the number and/or affordability of homes if viability improves	Yes, review offered 2 years after the completion of each phase.
Nominations	N/A	DMR homes must be allocated to households on the Intermediate Rent Housing list	Would accept nominations from Intermediate list once issued, subject to their own eligibility criteria.
Tenure blind design	Housing standards apply to all tenures	Must provide same standards as build for sale housing	Affordable units would be pepper-potted. Some aspects of design do not meet expected standards

Affordability of the Market and DMR units

186. Grosvenor have provided some illustrations of the type of residents who could potentially afford to live in the market flats. The examples show an average 1 bedroom market rent unit having a rent of £2,041 per month, and an average 1 bed DMR unit priced at £1,508 per month (approximately 75% of market rent). They based their examples on employed workers earning the median income for the Bermondsey and Old Southwark constituency of £39,000 pa. This could include teachers, nurses and police officers. It shows that a couple or two sharers both earning the median income could afford 49% of the 1 bedroom market flats but only 13% of the 2 bedroom market flats. The average annual rent on a 2 bed market flat would be £27,144, but if you assume that rent cost should not exceed 40% of net income, then the maximum rent affordable to a couple on a joint household income of £78,000 would be £21,840.
187. In order to access the affordable DMR flats, couples or sharers would need to be earning around £30,000 each (or a blended equivalent). This demonstrates that those in the most acute housing need would not be able to afford the average DMR flats, and the rent levels being proposed by Grosvenor, at 75% of market rents, would be significantly above the social rent and London Living rent costs expected under the emerging NSP policies, and the London Living Rent expectations in the new London Plan.

The Assessment of Viability

188. Affordable housing policies at London and Southwark levels state that the policy expectations are 'subject to viability' testing of individual developments. It is therefore legitimate to consider the specific viability of the Grosvenor development and the impact that this has on the delivery of affordable housing.
189. It is Grosvenor's position, as set out in their submission, that the development could

not viably support any affordable housing whilst creating a reasonable return to the developer. Despite this, and in recognition of the priority to provide affordable housing, they make the offer of 27.5% (accurately 27.37%), and on this basis Grosvenor assert that this would comply with policy in that it exceeds the maximum reasonable amount which could be delivered without jeopardising the delivery of the development.

190. GVA were appointed to assess the appraisal on behalf of the Council. Negotiations have extended over several months, without agreement. The main points of difference between the Council and the applicant are set out below.

Table 6 – Comparison of Viability Positions of Consultants

Input	DS2 Position	GVA Position	Variance
Benchmark Land Value	£38 million	£33 million	£5 million
GDV	£765.9 million	£873 million	£107.1 million
Construction costs	£464.9 million	£455.3 million	£9.6 million
Operating costs	At 30% for private and 40% for DMR	At 25% for private and 23% for DMR	Impacts on GDV variance
Residential Market rents	At £37.81 per sqft per annum	At £40 per sqft per annum	Impacts on GDV variance
Yield	3.5% for private 3.75% for DMR	3.25% for private 3% for DMR	Impacts on GDV variance
Target Profit level	12% IRR	11% IRR	
Finance costs	6%	6%	Not relevant for IRR
Professional fees	12% £64 million	10% £50.5 million	£13.5 million
Other costs	£15,694,500	Not included as GVA were not provided with sufficient information to review	£15,694,500

191. Benchmark Land Value: in this case, this has not been a major point of difference. The BLV of £38 million relates to the Established Use Value of the buildings currently on the site assuming they continue to be let for their existing uses, compared to GVA at £33 million. This accords with the methodology in the London Plan and Southwark Viability SPG guidance, and so is accepted. The difference of opinion is £5 million, which although not an inconsiderable sum, has a negligible impact given the total value of the development.
192. Build Costs: There is a difference between the parties of approximately £25 million (including contingencies) based on surveyors reports.
193. Residential Rents: This is where the largest difference of opinion lies, and because it underpins the assumed Gross Development Value (GDV) it has a significant impact on the overall viability. GVA (for the Council) have assumed much higher private rents, based on an assessment of comparable housing developments. GVA has assumed a 'place-making premium', ie that a development of this scale has the potential to change perceptions of the area and thereby command rents much higher than have been seen in the area previously. DS2, on behalf of Grosvenor, have taken a more cautious view.
194. Yield: this is expressed as a percentage which effectively acts as a multiplier on the

net income from the scheme, and therefore small difference in the yield can make significant differences to GDV of the scheme.

195. Operating costs: This relates to the management costs of the completed residential units, and includes repairs and maintenance, and the administrative and legal costs associated with lettings. This figure also assumes the impact of units being vacant ('voids'), which is effectively the forgone rents for the period of vacancy.
196. Grosvenor have commented that the PRS market is relatively immature, in that there are relatively few large scale schemes completed and occupied. It is their view that as the market matures and operators gain more experience, efficiencies will increase. GVA considered the operating costs of schemes such as the East Village at Stratford, and the costs assumed for the Delancey development at Elephant and Castle, which was recently granted planning permission. In GVA's view, there is nothing about the Biscuit factory development which should make it any more expensive to operate than these other examples. On that basis, the GVA assessment included an operating cost equating to 23-25%, which is significantly less than Grosvenor's stated figure of 30-40%. When capitalised, this impacts the GDV by £60 million, which is significant. Grosvenor has interpreted this difference as providing a lower level of service to the DMR residents. GVA consider that it properly reflects the reality of the emerging market, the likelihood of shorter void periods for the lower cost DMR units, and the potential lower capital cost of replacing fittings in the DMR units.
197. The combined impact of these and other smaller differences on the inputs to the appraisal are what lead to the differences of opinion on overall viability. GVA conclude that, based on a return of 11% IRR, the proposed development could provide around 32% affordable housing, by habitable rooms, with a tenure mix consistent with the 2017 version of policy P4 (ie including 14% of affordable units being affordable for households with incomes of £60,000 to £90,000). There has been limited time to re-assess the conclusions using the amended version of P4, but GVA have indicated that the development could still support around 27% affordable housing at the social rent and London Living Rent equivalent levels required by the amended policy.
198. As well as the standard appraisal, GVA have carried out what is described as a 'stand-back' review, which is a kind of sense check on the conclusions. This approach is endorsed by the Council's Development Viability SPD.
199. To do this, GVA has used the standard inputs suggested by DS2 to create two more hypothetical development scenarios. One assumes a Build for Sale development comprising the same number of units but all valued as market housing for sale, with no affordable housing. The second is a Build for Rent development of the same scale, but all let at full market rents. In both hypothetical scenarios, the inputs used by DS2 would create a negative land value, ie even with planning permission for 1342 flats for either private rent or private sale, the land would have a negative value. Clearly this is contrary to all market evidence for land sales in inner London, and suggests an inherent flaw in the underlying assumptions in DS2's appraisal.

Financial impact of the provision of the school

200. Grosvenor have suggested that the development is subsidising the delivery of the replacement Compass school, and that without the obligation to build the new school they would have been able to provide more affordable housing.
201. Policies at all levels, including saved policy 2.3 of the Southwark Plan, prohibit the loss of existing education space unless proper and acceptable replacement provision is made. Therefore Grosvenor would be under a policy obligation to replace the

school within any development. In this case, the new school is being re-provided on a much smaller site, and the balance of the land used to build housing.

202. The Department for Education support the school proposals and have indicated that, subject to final costings being assessed, and Ministerial approval, they expect to make a grant of around £21 million towards the construction and fit out costs, and a land contribution of around £5.7 million. Although it is difficult to directly compare the breakdown of the costings in the Grosvenor appraisal, it is noted that a figure of £20.325 million has been included in their appraisal to construct the school, which includes design and other fees as well as construction costs. This would appear to be consistent with the indicative grant figure provided by the Department for Education. In addition, the assumed land cost of £5.7 million is around 41% of the ascribed BLV of the Campus site (given by DS2 as £13.8 million). Given that the land for the new school equates to only around 28% of the Campus site area, this would not suggest that the land is being given over at a discounted or subsidised value, especially taking into account the policy requirement to replace the school.

Conclusion on Viability

203. GVA have concluded that the amount of affordable housing, being 27.5%/27.37% of habitable rooms at an average discount of 25% below market rates, is not the maximum reasonable amount of affordable housing that the scheme could support. The subsidy pot could be much larger, and could be applied to both increase the total amount of affordable housing and increase the depth of discount applied to the affordable units. This could include the ability to support a more significant amount of housing at social rent equivalent rent levels. The GLA stage 1 report was issued prior to the GVA report being received, but concluded that whilst it acknowledged the viability constraints of the scheme, in the absence of an independently verified viability position the affordable housing offer is unacceptable. In particular, the GLA point to the requirement to deliver deeper DMR discounts.

Review Mechanism

204. London Plan and Council policies and guidance require viability reviews if planning permission is granted for a development which is not fully compliant in terms of affordable housing delivery. This would include an 'early stage' review if substantial commencement has not occurred within a prescribed period (usually two years) and a late stage review, which the GLA describe as being at 75% occupation. Grosvenor have accepted the principle of reviews and suggested that this late stage review could occur once all phases of the development are complete and occupied and rents have stabilised. This would have the advantage of being able to reflect actual build costs and the achieved rents once the scheme is fully settled and market rents in the final phases (likely to be the optimum rents because any place-making premium would have been realised) are known. Whilst this suggestion is positive, it does not overcome the fundamental difference of opinion as to the value of the scheme at this time, and the minimum level of affordable housing being guaranteed at the point that a decision to grant planning permission would be made.

Conclusion of Affordable Housing

205. BTR is a relatively new housing type, but is supported by the NPPF, London Plan and the draft NSP as a means of accelerating housing delivery and improving the quality of the housing offer to those who cannot afford (or do not want) to buy flats in London. The GLA, in their Stage 1 report, have strongly supported the principle of the development, and recognised some of the upfront costs which have affected viability, including the borrowing costs associated with the large first phase. The report was

issues prior to the GVA assessment being available, and the GLA conclusion was that, in the absence of an independent verified viability position, the current offer was not acceptable, in particular they required a deeper DMR discount, including units at London Living Rent levels.

206. Grosvenor's offer has not changed since the submission of the application in .23 October 2017, and they maintain their position that this is the most the scheme can support. They point to the benefits of early delivery of housing, tenure blind design and management, and the creation of homes suitable for workers such as teachers, nurses, police officers and other professional occupations. However, their own figures show that even those on median local incomes of £39,000 per annum, living as couples or sharers, would not be able to afford the average market rent home in the scheme.
207. Grosvenor have stated that the 'subsidy pot' could be allocated in different ways to create some lower priced units, but with the removal of the bracket for DMR for those on £60-90,000 in the emerging London Plan and NSP there would be little scope to do this given that the average discount is limited to 75% of full market rents. Market, in this case, is defined as units within the development itself, which is already likely to be higher than average rents in the wider surrounding area. The options for the distribution of affordable units have been considered, but none would provide a meaningful number of units affordable to those in most acute housing need, in terms of either social rent equivalent or London Living Rent costs.
208. Grosvenor have offered a covenant period of 15 years. This is less than the minimum 30 year period expected under the NSP. The draft London Plan sets a minimum requirement of 15 years, but notes that covenant periods are expected to increase as the market matures. This short period is offered despite Grosvenor's assertion that they would own and management this estate for the long term as part of their wider portfolio of housing across London. The short covenant period would not affect the affordable homes, but would mean that at the end of 15 years the wider development could be disposed of for market sale and any increased value at that time which benefits the developer would not deliver any additional affordable housing.
209. It is noted that the split for tenure types set out in the amended NSP policy P4 can be ascribed only limited weight at this time due to the draft nature of the policy, that it is out to consultation, and that objections were made to the earlier version of the policy. Similarly, the draft new London Plan, which sets out an expected split for DMR housing in policy H13, has not yet been through its examination in public, and although it is more advanced than the NSP it can also be given limited weight in decision making.
210. However, since this housing type was not foreseen or recognised at the time the adopted Southwark policies were prepared, it would be reasonable to place some reliance on the evidence base which supports the NSP and London Plan draft policies. This demonstrates the continuing acute need for all forms of housing, but reflects the priority to provide homes to those households whose income levels mean that they have the least number of housing choices, and therefore the most acute need.
211. The development could make a significant contribution to the overall supply of housing in Southwark, addressing the Council's housing targets. The overall development would also provide some positive benefits including delivering the replacement school and new public realm. However, these benefits would not outweigh the failure to comply with key policies at national, regional and local levels to maximise the supply of affordable housing.

212. In conclusion, it is recommended that planning permission be refused due to the failure to deliver the maximum reasonable level of affordable housing, in line with adopted policies of the NPPF, the London Plan, Core Strategy and the Southwark Plan, and failure to require an appropriate split of tenure types, including social rent and London Living Rent in accordance with the new London Plan and NSP. This is set out as reason for refusal number 2 on the draft decision notice.

Mix of dwellings

213. Core Strategy Strategic Policy 7, 'Family Homes', requires a housing mix of at least 60% dwellings with two or more bedrooms, with 20% having at least three bedrooms. No more than 5% of the units should be studios, and these can only be for private housing. Southwark's Emerging NSP policy P4 states that PRS developments must provide a mix of housing sizes, reflecting local need for rented property
214. The emerging Mayor's New London Plan policy H12 states that schemes should generally consist of a range of unit sizes and that to determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme the applicants and decision makers should have regard to a range of matters including the range of housing need and demand identified in the London SHMA, the mix of uses in the scheme, the nature and location of the site, the role of one and two bedroom units in freeing up family housing.
215. In addition to this Southwark's emerging NSP policy DM4 on PRS states that PRS developments must provide a mix of housing sizes, reflecting local need for rented property.
216. The proposed development will provide 1342 residential units. 1217 of these units are proposed in detail form while the remaining 125 would be provided in plot BF-U&V, which has been submitted in outline form. The proposed mix of accommodation across the whole development is set out in Table 7 below.

Table 7 – Mix of Accommodation

	Studio	1-bed	2-bed	3-bed	Total
Number	146	493	532	171	1342
% Mix	10.9	36.7	39.6	12.7	100

217. The proposed mix of accommodation would not accord with the SSP and Core Strategy policies specifying the mix of accommodation for new development. In particular there would be an over-provision of Studio and 1-bedroom units and an under provision of 2-bed and 3-bed units. The applicants have submitted market research which identifies a significantly greater demand among renters for smaller units. In addition to this the applicants state that the policy direction in relation to PRS development requires local policies in relation to mix of accommodation to be applied flexibly in relation to large scale PRS development proposals. The applicants have also confirmed that none of the studio units would be made available as affordable housing.
218. The emerging policy in relation to this type of residential accommodation recognises that PRS is more likely to attract a different range of occupiers than standard residential accommodation with increasing mobility of tenants and smaller households. Therefore the focus on smaller units may meet a legitimate demand. The GLA have noted that the proposed mix of units "is acceptable in strategic planning terms given the central location and high public transport accessibility of the site and

the fact that this is a build to rent scheme.”

Wheelchair accessible housing

219. 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 that 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’.
220. Within the proposed development the applicants have committed 10% of the proposed accommodation to be designed to meet M4(3) Wheelchair housing. For the detailed element of the proposed development 10.4% or 127 of the residential units proposed have been designed to accord with the wheelchair standard. During the course of the application the applicants have amended the mix and layout of units so that each of these units would meet or exceed the minimum floor space standards for wheelchair accommodation set out in the Councils Residential Design Standards (RDS) SPD. These are predominantly provided as 2-bed or 3-bed units with 11 x 1-bed, 93 x 2-bed and 23 x 3-bed units.
221. All other units will meet the requirements of Building Regulation Category M4(2) with the exception of 29 units at levels 2 and 3 within building F. These units are all conversion units within the original building which would require additional access steps to respond to the structural constraints of the building.

Density

222. London Plan (2016) Policy 3.4, Optimising Housing Potential, 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 Southwark Core Strategy 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, a density range of 200 to 700 habitable rooms per hectare (hrh) would be sought here. This policy also 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).
223. Emerging policy within the London Plan and the Southwark Plan has removed reference to the density matrix. Instead greater emphasis is placed on assessing density by giving consideration to the site context, impact on neighbouring amenity and quality of accommodation. Under the emerging policies all schemes would need to achieve a high quality of accommodation and particularly where there is a requirement to optimise housing delivery on brownfield sites in urban locations where there is good public transport accessibility. The application site is a site with these characteristics and can support high density accommodation provided it is of a high quality.
224. Council officers have undertaken density calculations for the proposed development using the Mayor’s and then Southwark’s methodology. This provides a density of 832hrh. Officers have worked with the architect and design team during the course of this application to secure revisions to the layout to improve standards and attempt to better meet the RDS standards. Amended plans were submitted however these have still not addressed the key concerns. Further detail on residential quality is provided in paragraphs 225-278 of this report.

Quality of Accommodation

225. The site covers an area of 6.2ha. Given the scale of the site and the relationship with the surrounding area it is not considered to be a site where constraints mean that it would not be possible to meet the highest residential quality standards as set out in the Council's Residential Design Standards (RDS) SPD. Officers have reviewed the proposals in detail and there are concerns with the level of private amenity provision, the level of communal provision on some blocks and the proportion of single aspect units across the site. The proposed residential accommodation does not meet the expectations of an exemplary quality of design as required for developments with tall buildings and a high density.
226. Policy 3.5 of the London Plan requires housing developments to be of the highest quality internally, externally, and in relation to their context and to the wider environment. They should enhance the quality of local places, incorporate requirements for accessibility and adaptability, and meet minimum space standards.
227. In terms of Southwark policy, saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. The Council's RDS SPD establishes minimum room and overall flat sizes dependant on occupancy levels and the units should be dual aspect to allow for good levels of light, outlook and cross-ventilation. All units should have access to private amenity space with any under-provision in private amenity space added to the communal space. In addition to this the RDS SPD sets out the criteria for exemplary design where the proposal exceeds maximum density thresholds and where tall buildings are proposed.
228. As noted above emerging planning policy within the New London Plan and the New Southwark Plan removes the density matrix and references to an upper limit for the density of new development and instead places more emphasis on the quality of accommodation within higher density developments. Emerging policy D6 of the New London Plan states *that the higher the density of a development, the greater the level of scrutiny that is require of its design, particularly the qualitative aspects of the development design, and the proposed ongoing management.*
229. Development which is of a high density and includes a tall building is expected to demonstrate an exemplary standard of design. Section 2.2 of the council's Residential Design Standards SPD advises that for a development to be considered as being of an exemplary standard of design, applicants will be expected to demonstrate that their proposed scheme exceeds the residential design standards and includes features such as:
- significantly exceed minimum floor space standards;
 - provide for bulk storage;
 - minimise corridor lengths by having an increase in number of cores and maximum of 8 dwellings per core.
 - include a predominance of dual aspect units
 - exceed the minimum ceiling height of 2.3m
 - have natural light and ventilation in kitchens and bathrooms
 - exceed amenity space standards
 - meets good daylight and sunlight standards.
230. The following paragraphs set out how the proposed development compares with the Council's exemplary accommodation criteria, with reference to the new London Plan where relevant.

Dual Aspect

231. The Council's RDS SPD recommends that developments that exceed the recommended density range or have tall buildings proposed, should have a predominance of dual aspect residential units. The Mayor's Housing SPG states that:

"a dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building (the provision of a bay window does not constitute dual aspect)"

232. The Council's RDS SPD states:

"Where dual aspect cannot be provided, the applicant must prove that the single aspect is of a standard not inferior to multiple aspects and that a high quality of design is still achieved."

233. The Council's RDS SPD and the Mayor's Housing SPG note the many benefits associated with dual aspect units. These include better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation, a greater capacity to address overheating, mitigating pollution, a choice of views, access to a quiet side of the building and greater flexibility in the use of rooms.
234. The applicants suggest that the proposed development would provide 60% dual aspect units and that this would constitute a predominance of dual aspect units. However the officers would contend that not all of the units identified as dual aspect units would constitute true dual aspect providing the benefits associated with dual aspect units.
235. There is a predominance of dual aspect units on plots BF – D&E (66%), BF-OPQ (63%), BF-W (73%) and BC-1234 (71%). However there would not be a predominance of such units on plots BF-F (31%), BF-RST (54%) and BC – 5 (57%). This results in an overall percentage of dual aspect units across the site of 55%, which is a majority but would not be considered to be a predominance which officers would generally consider to be over 60% of units.
236. The difference in dual aspect figures arises largely from differences on Plots BC-1234 and BC-5. The applicants have sought to overcome the issue of single aspect units on these plots by having recessed and projecting building lines allowing for the insertion of a slot window between 0.5-0.75m in width in a small projection similar to a bay to provide a secondary outlook/cross ventilation. Officers do not accept that all of these units would provide the benefits of a dual aspect unit. Where the unit has a deep floor plan, the secondary window is situated in the final quarter of the room close to the main window and where the secondary window would be within 5m of a neighbouring balcony or roof terrace. This is illustrated in the examples set out below:

Image 6 – Single Aspect Unit BC-1234

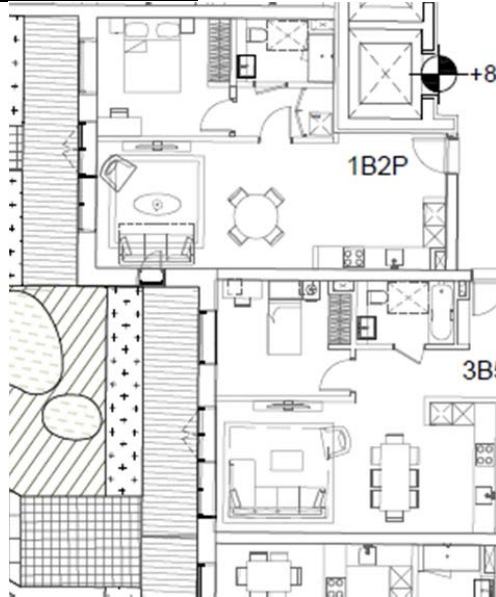
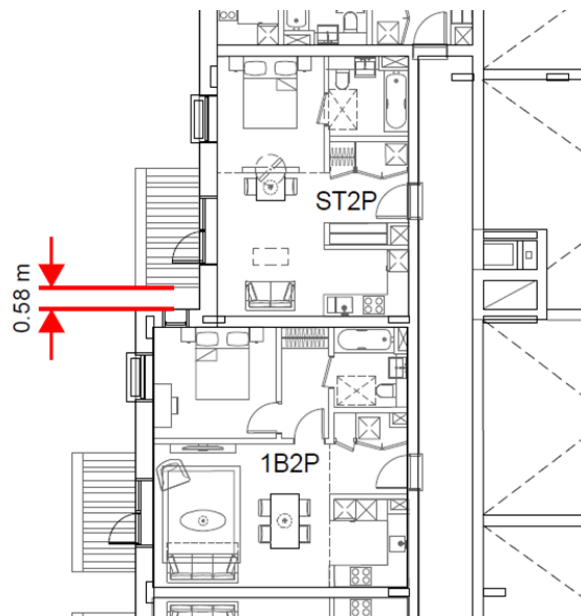


Image 7 – Single Aspect Unit BC-5



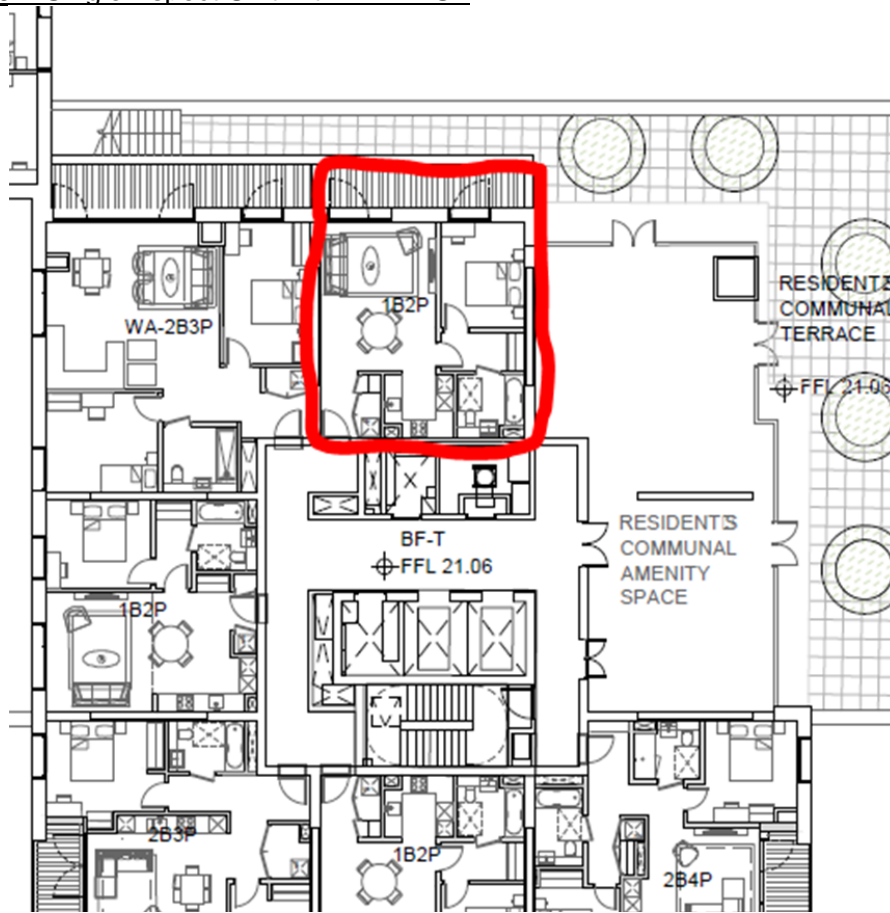
237. While the slot window may provide some limited additional outlook there would be significant privacy issues associated with the use of this which would limit its effectiveness in delivering a secondary outlook or being openable for cross ventilation. In addition to the levels of daylight. As such Council's officers are of the view that the proposed detailed element of the proposed development would only provide 55% dual aspect units. This level of provision is not considered to be acceptable and would severely impact on the quality of accommodation for prospective residents. The proposed development would not comply with the requirement to provide a predominance of dual aspect units.
238. The Council's RDS SPD does allow for single aspect units where the applicant can demonstrate that the single aspect is of a standard not inferior to multiple aspects and that a high quality of design is still achieved. This has been achieved for the single

240. Image 8 – Single Aspect Units within BF-RST



241. These single aspect units are not generous in terms of internal floor space. Neither unit would have access to private amenity space. The separation distance from habitable rooms opposite would be 18.2m and they would face towards a 20 storey tower, impacting on privacy and providing limited outlook and constrained views for prospective residents. The units would have low levels of daylight and sunlight. The main living space for the two bedroom unit would have Average Daylight Factor level of 1.7 whilst the main living room for the one bedroom unit would have an ADF level of 0.4 This is covered in more detail in the daylight and sunlight section. The bedrooms of both units have an ADF level of between 0.3-0.7. Despite the proposed plans showing an open plan layout the daylight and sunlight analysis submitted with the application has referred to these rooms as living rooms rather than living/kitchen/diners, which have a higher ADF requirement. It is therefore assumed that the kitchens of these units would receive very low levels of natural daylight. Officers therefore conclude that the proposed units would be inferior and would provide an unacceptable quality of accommodation for prospective residents.

242. Image 9 – Single Aspect Unit within BF-RST



243. The unit identified above is a single aspect unit with a north easterly aspect. While it does have private amenity space this is situated directly next to an access route and stairs going between communal roof terraces situated on the fourth and fifth floors of the block. These residential units would have very limited privacy. Internal floor areas which just exceed the minimum floor space standards and again are not considered to provide an exemplary quality of accommodation akin to that experienced by the multi aspect dwellings.

244. Given the overall proportion of single aspect units across the development site and the particular qualitative design issues associated with the single aspect units the proposed development would not comply with the criterion for exemplary accommodation which requires a predominance of dual aspect units. As such the proposal would be contrary to Strategic Policy 5 – Providing New Homes and the advices set out within the Council's Residential Design Standards SPD.

Internal space standards

245. The Council's RDS SPD defines the minimum standards required for internal accommodation, including overall unit as well as individual room sizes. The following table shows the range of proposed unit sizes as compared to the SPD standards.

Table 8 – Minimum Residential Areas

Unit Size (bedroom / person)	SPD Minimum Unit Area (sqm)	Proposed Unit Range (sqm)
Studio (1-person)	37	38.1–76.3
1-bed (2 person)	50	51.5-72.1

2-bed (3 person)	61	63-88.1
2-bed (4 person)	70	72-94
3-bed (5 person)	86	88.5-116.8
3-bed (6 person)	95	97.5-118.5

246. All of the proposed units would exceed the minimum floor space requirements, although some by only a small amount.

Internal Daylight and sunlight

247. A Daylight and Sunlight Assessment based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens and Living/Kitchen Diners. For APSH the BRE guidance notes that the main requirement for sunlight is in living rooms, and recommends that they receive at least 25% of the total annual total, 5% of which should be received during the winter months. The applicants have adopted a worse case scenario assessment of internal daylight and sunlight assessing the impact on the lower floors of buildings across the site. If the figures for the rooms situated on the upper floors were included then there would be further improvement as daylight and sunlight levels increase on the upper floors.

248. The applicants have tested the units on the following floors of each plot:

Table 9 – Floors tested for Internal Daylight and Sunlight levels

Plot	Floors Tested
BF – D&E	3, 4,
BF – F	1, 2, 3, 4
BF – OPQ	1, 2, 3, 4
BF – RST	1, 2, 3
BF – W	1-12
BC – 1234	Upper Ground, 1, 2, 3
BC – 5	Upper Ground, 1, 2

249. The results of the ADF analysis provided by the applicants suggests that in general the proposed residential accommodation would receive good levels of daylight and sunlight. The highest levels of compliance are within blocks BF-W and BF-F where there are limited obstructions to daylight and sunlight. The lowest levels of compliance are within the blocks on plots BF – OPQ, BF – RST and BC – 1234.

Table 10 – Compliance with BRE Guidelines for ADF

Plot	Windows Tested	Compliance
BF – D&E	86	85%
BF – F	223	91%
BF – OPQ	256	84%
BF – RST	195	84%
BF – W	125	100%
BC – 1234	398	84%
BC – 5	67	88%

250. Across the Masterplan site of the rooms tested 801 were bedrooms, 349 were living rooms, 159 were Living/Kitchen/Diners (LKDs), 12 were kitchens and two were studios. 88% of the windows tested would meet or exceed the minimum ADF level recommended within the BRE guidelines. While only 4% of the bedrooms would not comply with the recommended guidelines 24% of the living rooms tested and 27% of the LKDs would not comply with the recommended guidelines for ADF values. However the daylight distribution test compliance shows that 29% of the living rooms would be below the recommended guidelines for this and 24% of bedrooms would not comply. Conversely only 7% of the LKDs would have low levels of daylight distribution. The LKDs are predominantly within units with dual aspect and therefore this highlights the benefits of dual aspect units in providing improved daylight levels.
251. In many instances the rooms which do not comply with the BRE guidelines in relation to ADF are situated below projecting balconies or are in recessed elevations to allow for an inset balcony. In this instance the benefits of the provision of private amenity space in the form of balconies is considered to be a material benefit that would outweigh any harm from the marginally reduced levels of daylight. This is the case for the south facing rooms within blocks BF-O and BFQ. This plot has a predominance of dual aspect units and therefore many of the units with low levels of daylight and sunlight would have rooms facing another aspect which would receive higher levels of daylight and sunlight. Of the other blocks with a lower proportion of rooms complying with BRE guidelines in relation to ADF are on plots BF-R,S,T and BC-1234.
252. Within plot BF-RST 17 of the rooms tested that would not comply are living rooms or LKDs. The windows with the lowest levels of ADF are those with single aspects into the proposed internal courtyard. As an example unit R.01.03 (shown above) is situated on the first floor and is a single aspect one bedroom unit where the living room would have an ADF of 0.4 and the bedroom 0.7. The respective unit on the floor above would also have a living room with an ADF of 0.7. Again this is a single aspect residential unit with no amenity space. The kitchen of this unit appears on plan to be linked in an open plan manner to the living room but the unit has been assessed by the applicants consultants for daylight and sunlight purposes as a living room. As such the kitchen is anticipated to receive very low levels of natural daylight. The daylight and sunlight report also notes that these units would also receive lower availability of sunlight.
253. 398 rooms were tested within plot BC-1234 with 54 failing to comply with the ADF levels recommended within the BRE guidelines for rooms of their type. Of the rooms which fail 31 are living rooms, 21 are living/kitchen/diners and 2 are bedrooms. The living rooms which would fall below the minimum requirement would have ADF levels of between 0.8 and 1.4. Many of the rooms with low ADF levels would also have very low daylight distribution levels which indicates that the room is more likely to require supplementary electric lighting. A high proportion of the living rooms tested are within units with kitchens situated within the deepest part of the unit away from the windows. While there is not a wall shown separating the kitchen area from the living space the assumption is that there will be a barrier dividing this from the rest of the room such that the kitchen would have very limited access to natural daylight. Of the living/kitchen/diners that fall below the recommended level these rooms would have ADFs ranging from 1-1.7. This would be significantly below the ADF level of 2 recommended for LKDs. The rooms are predominantly living rooms with depths of between 8-9.5m. Some would have a slot window providing an enhanced single aspect outlook however the low daylight levels are indicative of the limited benefits in terms of daylight and outlook associated with additional window. Of the windows that would receive low levels of daylight the majority would also receive low levels of APSH and WPSH.

254. Given the relatively low rise buildings and large areas of public realm around the site it is anticipated that the proposed residential accommodation within the proposed development should have good levels of daylight and sunlight. The proposed daylight and sunlight results, which are a worse case scenario, demonstrate that this is the case. However there are some low levels of daylight and sunlight within plots BC-1234 and BF-RST which give rise to some concerns and illustrate the concerns the Council have with the failure to provide a predominance of dual aspect units.
255. The applicants have also provided details of overshadowing of amenity spaces across the site. Most plots contain communal spaces for residents. Each plot would have some communal amenity space which would comply with the BRE guidelines in respect of receiving 2 hours of sunlight at the equinox. There would be some communal spaces which would not comply with this but on balance as each plot would have communal space with good sunlight levels this would be acceptable.

Privacy

256. The Council's Residential Design Standards SPD recommends a minimum of 21m distance between the rear elevation of properties and 12m distance between properties that face one another, including across a highway.
257. Minimum privacy distances would be exceeded on most blocks except in the following instances:
- Plot F - The proposed extension upper floor wings would have single aspect units with habitable rooms' windows within 18m of single aspect habitable rooms' windows of units opposing.
 - Plot D&E – The upper floors would have facing habitable room windows within 18.35m. However these are secondary outlooks and both units would also have windows to living room facing another direction.
 - Plot OPQ – Facing habitable room windows within 10.67m of each other between blocks P and Q. However these windows are secondary and both living spaces would have primary habitable room windows facing in alternative directions.
 - Plot RST – There are residential units which face into the square courtyard on this plot. The separation distance is predominantly 19.8m across the square however where there are projecting elements this falls to as low as 16.81m between habitable rooms.
258. Of most concern in relation to privacy distances are the residential units within the tower block RST. 29 of the units facing into the courtyard on floors 1 to 7 would be single aspect and 26 of these would also lack amenity space. This in conjunction with the lower levels of daylight and sunlight to these units and the below policy compliant separation distances would result in a substandard quality of accommodation for these units in particular.

Amenity space

259. Section 3 of the Residential Design Standards SPD sets out the Council's amenity space requirements for residential developments and states that all flat developments must meet the following minimum standards and seek to exceed these where possible:

50sqm communal amenity space per development;

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

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

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

260. The Mayor's Housing SPG standard states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. Balconies and terraces should also have a minimum depth of 1.5m.
261. The detailed element of the proposed development provides 1217 new dwellings. Of these 375 (31%) would have no access to usable private amenity space. The details of private amenity space provision for each plot are set out below.

Table 11 – Units without usable Private Amenity Space

Plot	Units without usable Private Amenity
BF – D&E	18 (14%)
BF – F	95 (53%)
BF – OPQ	10 (7%)
BF – RST	203 (41%)
BF – W	0
BC – 1234	46 (19%)
BC – 5	2 (5%)
Total	375 (31%)

262. This is a significant under provision of private amenity space. The Mayor's guidance states that in exceptional circumstances, where site constraints make it impossible to provide private amenity space, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private opens space requirement. However the site is not significantly constrained to the extent that it is impossible to provide private open space therefore the proposed 31% of units that would have no private amenity space would fail to comply with the requirement to provide private amenity space.
263. In terms of communal amenity space all of the plots would have access to some communal amenity space predominantly in the form of landscaped terraces (the exception being Plot BC – 5 where communal amenity is provided in the form of a ground floor garden). The guidance relating to communal amenity set out in the Council's RDS SPD requires the provision of 50sqm of communal amenity for each plot along with additional area to offset the under provision in private amenity space for each plot.

Table 12 – Communal Amenity Provision

Plot	Communal Amenity	Requirement	Difference
BF – D&E	940	337.5	602.5
BF – F	807	1103	-296
BF – OPQ	701	521	180
BF – RST	920	2713.2	-1793.2
BF – W	120	110	10
BC – 1234	1440	966.1	473.9
BC – 5	690	199	491

264. As can be seen from the table above the majority of plots would exceed the communal amenity requirements however Plot BF – F and Plot BF – RST would fail to

make appropriate provision of communal amenity. Plot BF- F would fall short by 296sqm. However it should be noted that this plot would also provide a 690sqm publically accessible roof terrace. Given this level of public provision and the wider benefits associated with this the shortfall on this plot is considered to be acceptable.

265. However there would be a far more significant shortfall in amenity space provision on plot BF-RST of approximately 1800sqm. This plot would provide 390 units around three cores. 203 of these would not have any usable private amenity space. Each core would provide access to a communal roof terrace and all residents would have access to the amenity space within each block. However this communal amenity provision would amount to approximately 920sqm leaving the shortfall in communal amenity of 1793sqm.
266. This shortfall is significant and would impact upon the overall quality of the proposed residential accommodation within this block. By reason of the number of units without access to private amenity space and the significant shortfall in communal amenity space for Plot RST the proposed development would fail to comply with the Council's Residential Design Standards SPD, Policy 4.2 of the Saved Southwark Plan, Policy 3.5 of the London Plan and the guidance set out in the Mayor's Housing SPG.

Children's playspace

267. Policy 3.6 of the London Plan states that development proposals should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The applicants have undertaken an assessment assuming that the PRS accommodation would generate child yields similar to private residential accommodation and the discounted market rent accommodation would generate a child yield similar to intermediate accommodation. Applying this to the proposed plots would generate the following child yields:

Table 13 – Child play space provision

Plot	Play Space Provision			
	0-4 (sqm)	5-11 (sqm)	12+ (sqm)	Total Onsite Play (sqm)
BF – D&E	200	0	Off-site	200
BF – F	100	0	Off-site	100
BF – OPQ	200	500	Off-site	700
BF – RST	150	150	Off-site	300 (West Yard)
BF – U	100	0	Off-site	100
BF – V	100	0	Off-site	100
BF – W	0	0	Off-site	0
BC – 1234	330	0	Off-site	330
BC – 5	100	0	Off-site	100
Total	1280	650	Off-site	1930

268. The majority of the proposed residential accommodation would have access to suitable areas of child play space on-site. Plots BF – OPQ, BF – RST and BF – W would not have any private child play space however the initial two plots would be in close proximity to the public child play space provision to be provided within the masterplan site. BF-W would have a child yield requiring the provision of 50sqm for ages 0-11. This would be offset by the over provision of child play space in public areas throughout the site.

269. Within the public realm the applicants are proposed to provide 3 areas of publically accessible child play space. 500sqm within the area of public realm to the north east of Plot BF – OPQ (5-11s), 200sqm to the west of Plot BF-OPQ and 300sqm within the West Yard area of building realm. As such the child play space provision for ages 0-11 will be met within the masterplan area. The recreation needs of older children are proposed to be met off-site via a financial contribution in accordance with the Council's Planning Obligations SPD. The proposed development would therefore make acceptable provision for child play space.

Units per core

270. The Mayor's Housing SPG sets out that new developments should have a maximum of 8 units accessed from a single core to ensure that the prospective residents have a sense of ownership of the space. The majority of the proposed buildings across the site would have a unit to core ratio of under 8:1 in line with the GLA standards. Exceptions to this include Buildings BC-5 (11:1) and BF-F (max 11:1), Floors 1 and 2 of Blocks R and T, Floor 3 Block E.
271. These transgressions would affect a small number of units proportionate to the total number of units across the site. The plot with the highest number of units affected would be Block BC-5 where all the units would be served by the same core resulting in 11 units per core. As all other aspects of residential quality are high for this plot this level of transgression is not such to warrant a specific reason for refusal.
272. Plot BF-F also has a high number of units with a units-per-core ratio of over 8:1. This is largely due to the retention of the original building and providing residential units within a converted factory building as well as retaining ground, first and second floor for non-residential uses. Given the benefits of retaining the existing building it is considered that the units to core ratio is acceptable in this instance.
273. The other plots affected are BF-RST on floors 1 & 2 of Block R and Block T and floor 3 of Block E on Plot – D&E. While the benefits of having a reduced number of units would not be met within these plots they only exceed the maximum of 8 per core by one unit. This would affect 45 units out of a total of 521 units across the two plots. The level of harm therefore is not considered to be sufficient to warrant a further reason for refusal.

Internal noise levels and vibration

274. Chapter 10 of the ES considers noise and vibration. It has two strands, the first of which considers the suitability of the site for residential and educational uses which is relevant to the quality of the proposed accommodation. The second strand is an assessment of the likely significant noise and vibration effects which would arise from the proposed development, and this is considered separately below.
275. With regard to *noise levels*, British Standard and World Health Organisation guidelines have been used to determine appropriate noise levels within the residential units, and best practice guidance has been used in relation to the proposed new school. Baseline noise levels were established through surveys conducted between April 2017 and May 2017. While the study does not take into account recent increases in train frequency from London Bridge Station, the ES advises that this is because the change in rail movements is not yet known, and that in the long term a change in noise levels of less than 3dB would be imperceptible, which would equate to a doubling in the number of train movements. Mitigation would be required for vibration effects from the railway. These mitigation strategies have been worked into the detailed design to ensure the internal noise levels and tactile vibration levels within the

Proposed Development would be compliant with the relevant noise criteria. The ES concludes that the completed development will accord with relevant policies in relation to potential noise issues arising from the development.

Secure by Design

276. A condition would normally be recommended requiring the proposed development to achieve secure by design certification. This would help to ensure that the safety and security objectives of policy 7.3 of the London Plan and saved policy 3.14 of the Southwark Plan would be met.

Conclusion on Residential Design Quality

277. The proposed development is of a density which exceeds the Council's maximum density range. To ensure that there would be no negative impact on the residential environment it is imperative that the proposed accommodation is of a quality which exceeds the minimum standards and meets the Council's exemplary design criteria. As set out in the section above the proposed development would fail to meet the Council's criteria in relation to the proportion of single aspect units and the failure to provide private amenity space for over 30% of the proposed residential units. In addition to this there are single aspect units within block RST which would have single aspect outlook over an enclosed courtyard with units which would fail to comply with the minimum separation distances between facing habitable rooms this in conjunction with the relatively low levels of daylight that these units would receive would result in a particularly unsatisfactory quality of living accommodation for these units.
278. The development would therefore fail to constitute an exemplary quality of accommodation as required by policy SP5 of the Southwark Core Strategy (2012) and the emerging policy P9 of the New Southwark Plan 2019, which permit densities in excess of the maximum range where it achieves an exemplary quality of accommodation. In addition to this the proposed development would result in unsatisfactory living conditions for residents on the lower floors of the proposed tower in units which would have no private amenity space, low levels of daylight and sunlight, inadequate separation distances between facing habitable rooms and be single aspect. The proposed development would be contrary to section 12 'Achieving well-designed places' of the National Planning Policy Framework 2018; policy 3.5 quality and design of housing developments of the London Plan 2016; policies D4 and D6 of the New London Plan 2018, strategic policy 7 family homes of the Core Strategy 2011; saved policy 4.2 quality of accommodation of the Southwark Plan 2007 and the 2015 update to the Residential Design Standards 2011.

Design

279. The NPPF stresses the importance of good design and states in paragraph 56 that: *"Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."* Strategic Policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to "achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in." Saved Policy 3.12 'Quality in design' of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. Saved Policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of

the local context, its character and townscape as well as the local views and resultant streetscape. With specific reference to tall buildings, Policy 7.7 of the London Plan (2016), 'Location and Design of Tall and Large Buildings' and Saved Policy 3.20 of the Southwark Plan sets out design requirements for tall buildings, both of which are discussed in further detail in the following paragraphs. Both the Submission version of the NSP 2019 and the draft new London Plan 2018 contain amended policies on design which, whilst of more limited weight, are referenced in this report where they have particular relevance to the matter under consideration. The previous section of this report highlighted the concerns officers have with the quality of the proposed residential accommodation. This section will focus on the wider design merits of the development including layout, massing and architectural detailing.

Site Layout

280. The proposal is for a comprehensive development of the former industrial site and former college site into a new mixed-use neighbourhood including the provision of a replacement secondary school (Compass School), new work places and retail spaces and rented housing all stitched together by an integrated public realm scheme. As noted in the history section above, the main Biscuit Factory site benefits from an implemented outline/hybrid planning permission which establishes the principle of the removal of existing commercial buildings and the introduction of residential flats. The current application integrates the Biscuit factory and Campus sites into a single development.
281. The site layout has been organised around the new routes that are introduced across the two sites. On the Campus site, Keetons Road – currently interrupted by the college grounds – is proposed to be reinstated and partly pedestrianised to link Jamaica Road with Clements Road. This pedestrian route then continues across the site and through to the viaduct to ultimately link Jamaica Road with The Blue. East-west movement across the site links public spaces, the Compass school, and links onto existing routes towards Southwark Park and Canada Water. This arrangement of public routes across the site organise the masterplan into a coherent gridded pattern of blocks.
282. This layout of routes and spaces transform the currently impermeable factory and college sites into a logical and well proportioned streets and routes that encourage permeability across the site and beyond. These new routes are also used to reinforce the character of the Masterplan. For example, Drummond Road has been defined by its residential and community focus whilst Keeton's Road is proposed as the main residential and commercial 'spine for the development. This detailed and character-focused approach is intended to give the proposed Masterplan a hierarchy which is appropriate for the context and complies with the council's urban design principles.

Biscuit Factory Plots

283. The Biscuit Factory site would contain 6 plots (5 in detail and 1 in outline). The buildings across these plots would range in height from 7 storeys up to a maximum height of 28 storeys (104m AOD) in the centre of the site. Key features of this part of the site are the retention and extension of Building F fronting Clements Road, the provision of a new area of public realm in the centre of the site and the erection of a tall building cluster on plot BF-RST. New buildings would also be introduced at the three corners of the Biscuit Factory site.
284. Building BF-F is a mid-20th century brick-built factory building with a large cavernous interior originally designed to accommodate large vehicles and bulk storage. This building is proposed to be retained and transformed into a large enclosed commercial

space with routes across it and through it leading to the main public garden at the centre of the site. On top of the building an E-shaped extension is proposed to provide additional residential accommodation and the roof of the main block is landscaped to provide a publicly accessible garden.

285. The E-shaped extension rises to 4-storeys above the factory building. It is set away from Clements Road and is designed to face onto the public garden at the centre of the Masterplan. This roof-top block is proposed to be clad in metal and glass in a range of muted colours – a nod to the stacked tins that were originally stored in the building
286. The second retained building is at the centre of the Masterplan which forms part of the outline element of the development. The block would be extended and refurbished for offices and faces onto the south yard at the end of the Keeton's Road axis.
287. The retained Biscuit Factory buildings are an integral part of the Masterplan and reinforce the links with its industrial past. Their retention and careful integration into the overall scheme in this way contributes positively to the character of the proposal and its success will rely to a large degree on securing the routes and access to public spaces across the site.
288. Plot BF – RST is situated in the centre of the masterplan area. This plot contains a three residential blocks which are joined on the lower floors (Ground to Floor 3). The Block R would rise to 9 storeys with a maximum height of 38.44m AOD. Block S is the tallest building in the proposed development and would rise to 28 storeys with a maximum height of 104.8m AOD. Block T would rise to 18 storeys with a maximum height of 71.24m in height.
289. The Plot – OPQ at the corner of Clements and Drummond Roads is divided in two L-shaped buildings with a route going through them and a dedicated children's play area. The buildings are brick clad and step up in height towards the centre of the Masterplan ranging from 8 to 13-storeys. Whilst the design of the new buildings is well mannered and appropriate, the proposed route and childrens play area is likely to be largely overshadowed by the new buildings.
290. At the western end of the site and immediately adjacent to the railway viaduct is Plot BF – D&E. The proposed building which would occupy this plot would be a part 3-/part 6-/part 12-/part 15-storey building. This would have a large triangular 3-storey brick-clad commercial block at its base with residential flats above. The base is intended to respond to the residential character of Clements Road with the taller residential element above rising up to 6 storeys along side the viaduct with a 12-storey tower on the south east corner and the 15 storey tower on the eastern edge. The residential block above is made up of two connected buildings clad in translucent glass with a deep-set layered façade that offers a degree of shielding from the immediately adjacent railway viaduct
291. Finally, at the southern end of the site Plot BF – W would be a tall narrow building up to 14-storeys in height. The building includes an active frontage at the base and a simple gridded brick-clad façade and is intended to be a focus of a number of approaches including Raymond Road and Drummond Road where they reach the viaduct.
292. The Campus Plots
293. The main Campus residential blocks are two large linear blocks fronting onto the extended Keeton's Road and Drummond Road. They have been designed as modern

‘mansion-blocks’ with projecting bays of accommodation and deep-set linking elements. This arrangement is logical and reinforces the street edges which are lined with commercial and community uses. Between the two linear blocks is an amenity space that varies in width from 16m – 18m. At the southern end of the site and facing onto Clements Road this space forms a small public square with a community facility opening out onto it. To the north of the public square and extending to the school is an elevated residents’ garden.

294. The architectural design is overtly modern, ranging in height from 4 to 10-storeys and finished in traditional brick. The blocks are simply articulated but with dramatically angled roof-top chamfers where the brick facade has been angled away to give each block a mansard-style silhouette. The linear arrangement, whilst logical, has resulted in a predominance of single-aspect accommodation which is inappropriate in such a dense scheme and is considered in greater detail elsewhere in the report.
295. Plot BC-5 would be comprised of a single mixed use building rising to 4 storeys in height. The ground floor would contain seven commercial units and the single residential core to the building. These would front onto the new pedestrianised section of Keeton’s Road that would be created between plots BC-1234 and BC5 and to the rear is a communal garden providing 690sqm of amenity space. The residential accommodation would be situated on the floors above.

The Compass School

296. The replacement Compass School has been designed to address the detailed needs of the school and stringent requirements of the Department for Education (DfE) On this significantly constrained site the school is planned as a U-shape building which generally respects the prevailing 3-4-storey character of the area at its edges and rises to 8-storeys in the middle of the plot where the main teaching facilities are located. This U-shaped arrangement allows for a generous south-facing playground on one side and a more sheltered courtyard to the north. The stacked classroom arrangement is a direct response to the ethos and teaching practices of the school and results in a highly articulated building which is easy to navigate and manages to provide high quality accessible facilities within a severely constrained site.
297. The main entrance to the school is from Keeton’s Road where the main public-facing facilities are located. On the Drummond Road frontage the most prominent feature is the roof-top MUGA which is located above the Sports Hall. When we consider the main playground spaces together with the elevated MUGA and the roof-top terrace the school has adequate outdoor facilities to meet its needs.
298. The design of the school uses high quality finishes including brick and metal cladding that will need to be detailed with care in order to ensure that the architectural quality can be delivered in construction. In order to ensure this architectural construction details as well as sample-panels of the cladding should be reserved by condition if the council were minded to approve this proposal. The impact of the school buildings on the amenity of neighbouring residents is considered separately in the Residential Amenity section of this report.

Massing

299. Policy 3.13 of the saved Southwark Plan states that in designing new developments consideration must be given to the height scale and massing of buildings, to ensure that developments are appropriate to the local context and do not dominate their surroundings inappropriately. Policy 3.20 of the same document does allow for permission to be granted for buildings that are significantly taller than their

surroundings provided that they comply with certain criteria.

300. The site is situated within an area with mixed character. To the north west of the site is predominantly 2-3 storey residential accommodation from the Victorian period as well as 1980s residential development. To the east is the Four Squares estate which is comprised of 4 perimeter blocks of a scale between 4-7 storeys in height.
301. The approach to massing has changed from the original perimeter block approach of the 2012, which proposed a more uniform building form of buildings up to 9 storeys in height. In response to changes to the site layout (relocating the school to the campus site), retaining block F and in response to specific place-making objectives of the applicant, taller buildings have been concentrated at the centre of the site, and whilst buildings are generally taller, their form is more broken and less potentially monolithic. The blocks with the greatest height would be situated in the centre of the site on Block BF – RST to mark the heart of the Masterplan and to act as way finders from the tube to the 'Low Line' and the new pedestrian routes through towards The Blue. The corners of the Biscuit Factory site are also marked with buildings of height, although of a lower order to the central buildings
302. Throughout the pre-application process it was suggested that allowing height in the central parts of the site would allow for development of a lower scale and massing towards the more suburban neighbouring development. The three plots on the Campus site would be of a lower order however these plots would still be occupied by buildings of a scale greater than that of their immediate surroundings.

Tall Buildings

303. The Masterplan is centred around two tall buildings that have been located at the core of the Biscuit Factory site – nearest the viaduct. This is a location where substantial buildings of this scale would not ordinarily be considered were it not for the railway viaduct which dominates the southern edge of the site and severs it from the surrounding area. In order to overcome the visual and physical barrier of the viaduct and create a destination space at the centre of the Masterplan two tall buildings are proposed. These help to give the Masterplan a focus which could also act as a landmark and where some height would be considered appropriate.
304. The two towers in the centre of the site would comply with most aspects of the Council's Tall Building policy as set out in saved policy 3.20 of the Southwark Plan 2007. The Council's emerging tall buildings policy (Policy P14 of the New Southwark Plan) also supports tall buildings and provides similar criteria, emphasising how tall buildings can be located at points of townscape significance and can contribute to Southwark's regeneration. The emerging policy also requires residential accommodation within towers to be of an exemplary standard. The paragraphs below consider the tower proposals in the centre of the site against the criteria of saved policy 3.20 of the Southwark Plan 2007.
305. In addition to the three tall buildings at the centre of the site, the Masterplan includes a number of buildings / elements that exceed 30m in height and could be classified as tall buildings in their own right. These include:
- 2 buildings on Plot D&E. comprising part 12-/part 15-storey building.
 - 1 building on Plot BF – W – up to 14-storeys
 - 2 buildings on Plot BF - OPQ –up to 14-storeys in height is proposed
 - 3 elements of The Campus buildings

Each has to be considered in its own right against the Tall Buildings criteria and in the context of the comprehensive redevelopment of this former industrial site. The criteria

under saved policy 3.20 are set out below.

- i) Makes a positive contribution towards landscape

306. The substantial improvement of the public realm including the new public spaces, the comprehensive re-modelling of the site with new routes and streets, as well as the increased permeability across the Campus site is intended to address the first aspect of the policy and make a positive contribution to the landscape.

Image 10 – Proposed Area of Public Realm in Centre of the Site



307. Image 11 – View of Public Realm and Buildings BF-F and BF-RST from Railway Arch



ii) Is located at a point of landmark significance

308. The Biscuit factory is not just a local landmark, it is embedded in the social history of Bermondsey. In many ways this complex is the focus of the local community and in the past included a vibrant mix of homes and factory buildings arranged around yards, which this proposal seeks to reinterpret. At the centre of the factory complex the historic photos show a landmark clock tower which was the focus of local views. In the same way, the tallest buildings are located at a point of landmark significance where communities from either side of the viaduct could converge..

309. Officers are satisfied that, given the comprehensive nature of the re-development, with an emphasis on a generous public realm this can now be considered a point of landmark significance, which is the focus of a number of approaches, the confluence of a number of routes and a destination in its own right. As such, it would comply with the emergent Tall Buildings policy and is a location of townscape significance where tall buildings are appropriate.

iii) Is of the highest architectural standard;

310. The two towers at the centre of the Masterplan are proposed as robust masonry columns with deep sculpted details around the large picture windows. The composition is highly articulated with a decorated base, a simple mannered middle and a sculpted recessive top that angles back for the topmost 8 floors. The base is designed with large arched openings that accommodate retail frontages and echo the robust brick arches of the viaduct. A 6-storey podium links the two towers. The buildings are clad in a rose coloured reconstituted stone inlaid with decoration that reflects the history of the site

311. While the proposed tall buildings in the centre of the site could be considered to have some architectural merit with high quality materials and detailing the failure to provide an exemplary standard of residential accommodation is not adequately justified. The tall buildings would not meet the Council's standards for exemplary residential accommodation and as a result of the failure to provide sufficient private amenity space, poor levels of privacy to a number of units and a high proportion of single aspect units means that this important aspect of the Tall Buildings Policy is not met. This is covered more fully in the quality of residential accommodation section in paragraphs 225 to 278 above.

312. The architectural qualities of the other tall buildings distributed around the site are designed to contribute positively to the mix of building types and architectural treatments in the Masterplan. The architects have developed each tower as a unique building designed by separate teams within their practice. The result is that, whilst each tall building has its own distinctive character, they all work together to form a cohesive whole as if from the same family. For example, the brick detailing and articulation of the 'mansion blocks' at the Campus buildings is extended, adjusted and reinvented as a perimeter block in the neighbouring plot BF – OPQ. In contrast the towers located at the either end of the Masterplan are designed as two distinct buildings where the angular crystalline character of Plot D&E is very different to the similarly scaled and ordered brick-clad building on Plot BF –W to reflect their varied contexts.

iv) Relates well to its surroundings, particularly at street level;

313. The towers have been deliberately aligned with the viaduct and set in open space at the centre of the Masterplan. The viaduct is at an angle of approximately 45° relative to the surrounding streets and, as a consequence, large triangular open spaces (yards), are arranged around the base of the towers. The lower floors are designed with large arched openings and defined by active frontages that address each space and contribute positively to the street scene and the places at the core of the masterplan.

314. The other tall buildings in the Masterplan have been designed to respond deliberately to their local street frontages. In the Campus buildings the entire block - not just the towers – has been designed with a continuous active frontage along its street edges. On Drummond Road, Keetons Road and Clements Road retail frontages and community facilities relate well to public spaces and routes, with the remainder dominated by residential lobbies and front doors to homes to ensure that the block form is an active and engaging whole that contributes positively to its street frontage. In Plot BF-OPQ at the corner of Clements Road and Drummond Road the centre of the plot has been opened up to access from the street to from a new route into the Masterplan itself. In this location the inclusion of the tall buildings has enabled the delivery of a significant public benefits at street level including a consolidated children's play space and a new route. Finally, the prerogative to deliver substantial commercial uses at street level and to overcome the close relationship with the viaduct buildings has shaped the design of the tall buildings at Plot W and D&E. Here each building has a base made of active commercial uses with shop windows and office frontages bringing active uses down to street level not only on the main street frontages on Drummond Road and Clements Road but also the extension of the Low Line along the railway viaduct.

v) Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

315. The Townscape and Visual Impact Assessment submitted with the application includes a number of the tall buildings as they can be viewed from various vantage points. Statutory listed buildings and conservation areas whose settings may be affected by these buildings have been identified and both rendered and wireline visualisations submitted to demonstrate the impact of the towers on these sensitive heritage assets.
316. The site does not include listed buildings and is not located in a conservation area. There are a number of heritage assets in the area, the most significant of which is St James Church (Listed Grade II*) around 250m to the west, the Wilson's Grove Conservation Area 150m to the north and the Thorburn Square Conservation Area 300m to the south near Southwark Park Road. The nearest listed buildings include the Grade II listed St Crispin with Christ Church on Southwark Park Road, Southwark Park School and Nos 124-130 Jamaica Road. Finally, Southwark Park is a Grade II Registered Park and Garden.
317. In these cases the council's policies echo the requirements of the NPPF and require all development to conserve or enhance the significance of the heritage assets and their settings taking care to avoid harm. The NPPF requires LPAs to identify any harm, and to consider it in the balance against the public and other benefits of the development.
318. In the wider London context, the submitted views demonstrate that the development is visible in the London View Management Framework (LVMF)
Views from Greenwich Park (LVMF 5A.2) and Blackheath Point (LVMF 6A.1) and could be viewed from various locations including Tower Bridge.
319. View 16 from St James Church (Listed Grade II*) demonstrates that the buildings will be viewed from the Church Yard in the medium to distant backdrop. Officers are satisfied that, due to the limited visibility of the new buildings and, the fact that the buildings generally relate well to the prevailing parapet heights around the church, when considered in the context of the distance separating the new tall buildings from the heritage asset and mature trees which screen the church yard, there is very little harm arising to the setting of this nationally important heritage asset.
320. Historic England consider that the development would have "*some impact on the sense of sanctuary within the churchyard*" and that "*there is a small degree of harm*". They advise that this limited harm should be weighed against the public benefits of the scheme in determining the application. In this case, the significant public benefits including the provision of a new school; new housing – including some affordable housing; the increased permeability of the masterplan site and the new public realm; as well as the new jobs arising out of the new commercial and retail spaces provided on the site; are considered to outweigh any harm caused.
321. From the Wilson Grove Conservation Area the degree of visibility is limited to a minor distant incursion over the rooftops on Janeway Street. Due to the extensive tree cover, this is likely to be only during the winter months and does not cause harm to the character and appearance of the conservation area or its setting.
322. The views submitted from various viewpoints around the immediate area demonstrate that, because the towers are at the very centre of the site, they are not visible in the immediate area. They will be visible in the main axial approaches where one can get a more distant view. These include View 8, 9 and 10 from the Southwark Park Carriage Way and Banyard Road as well as View 18 from Keetons Road. In both approaches the visibility is limited and recessive, and contributes to the legibility of the city identifying the local destination and encouraging the viewer to head towards the site

323. From Southwark Park the towers are not axial to the Carriage Way and they generally sit within the mature tree-lined screen that forms the edge of the park. As a result the setting on this Grade II Listed Park and Garden is largely preserved and the intrusion if any is limited to the lower of the two towers which appears as a local landmark over the roof-tops of the park edge buildings.
324. The greatest visibility of the proposed towers is likely to be from The Blue on Southwark Park Road (View 15). In this view the two new towers relate well to each other and appear to step up and away in the middle ground. Whilst the buildings appear as a major new incursion into this skyline, the deep-set design of The Blue appears as a fitting foreground and the new buildings contribute positively to its setting.
325. In conclusion, the tall buildings in the centre of the site generally conform with the council's Tall Buildings policy in terms of their siting and massing. The coherent and comprehensive nature of the proposal which balances open space with new routes and highly articulated buildings meets many aspects of the council's urban design and conservation policies and meets the relevant statutory tests set out in the NPPF. The stepping down of building heights from the centre of the site and the use of building "shoulder heights" to provide a more appropriate scale at the pedestrian level help the transition towards the lower density development that surrounds the site. Nevertheless the scale of buildings on plots BC-1234 and BF-D&E would be considerably greater than those of neighbouring existing buildings
326. The difference in scale is most accentuated between plot D&E and the neighbouring two storey residential properties on Clements Road, as illustrated in image 12 below. There also would be a change in scale along Drummond Road with the Campus buildings rising up to 10 storeys in height replacing the existing low rise school buildings which currently occupy the site.

Image 12 – View of Plot D&E from Viaduct



327. On both plots the buildings have been designed in a manner which seeks to respond to the more domestic surroundings while also responding to the policy requirement to optimise development in the urban location with good connections to Central London. Block D&E which would have commercial uses on the ground to second floors would

also have a masonry base with a combination of glazing and vertical coloured panelling for the upper floors to provide a lighter appearance, as set out in image 13 below.

Image 13 – View of Plot D&E from St James Road

328.



329. Plot BC – 1234 also contains buildings which are of a scale that would exceed that of existing neighbouring buildings. The massing of these blocks would be partially broken down by introducing recessed and protruding planes along the length of the blocks and also through the tapering façade line on the upper levels floors 6 to 8 on Keeton's Road and floors 8 to 11 on Drummond Road. The building has also been amended at the ground floor where it has been pulled back by approximately 800mm to improve the public realm, ensure the retention of more trees on Drummond Road and reduce the extent of management required for existing trees to be retained. In addition to this there would be activity at the ground floor level in the form of commercial units and also newly proposed duplex units. As such the proposed scale and massing of this block, while greater than that of the surrounding context, would not be of such an extent to cause harm to the character of the area.

Image 14 – View of Replacement School with BC-1234 in background from Drummond Road.



330. The replacement School on Plot BC – 6 would rise to 6-storeys in the central part of the site. This would drop down to 2 3 storeys on Keetons Road and 4 storeys with roof top MUGA on Drummond. In terms of scale and massing this would be appropriate give the 7 storey height of Flannery Court immediately adjoining the site to the north east.
331. Plot BF – OPQ also has a direct relationship with neighbouring existing buildings on the opposite side of Drummond Road. This block would have a shoulder height of 6 storeys on Drummond Road rising to 8 storeys where it is set back 1.9m from the main elevation fronting onto Drummond Road. Further into the plot block BF - Q would have a height of 13 storeys. Block BF - O fronting onto Drummond Road would appropriately manage the transition from the neighbouring 7 storey Marsden Square. The open nature of the plot including the area of public realm and park provide sufficient setting for the proposed building.
332. Plot BF - W would be 14 storeys in height with a narrow triangular floor plan. The extant consent recognised the need to provide a marker to the Masterplan site on this plot and the approved building maximum height for this plot was 32.45m (AOD). This established the principle of a tall building in this location. The current masterplan follows the same principles as the earlier permission in providing a building of scale in this location to announce the entry point into the development site. The proposed building would however be greater in height than the approved plan by 18.45m (approximately 6 storeys higher). The increased height arises from the desire to raise the residential accommodation above the railway viaduct level to ensure that all residential units have acceptable outlook and daylight and sunlight levels. To provide some setting for the building the ground and first floors would be recessed to provide an increased area of public realm at the ground floor level with activity provided by the proposed commercial use.

Architectural Design and Materiality

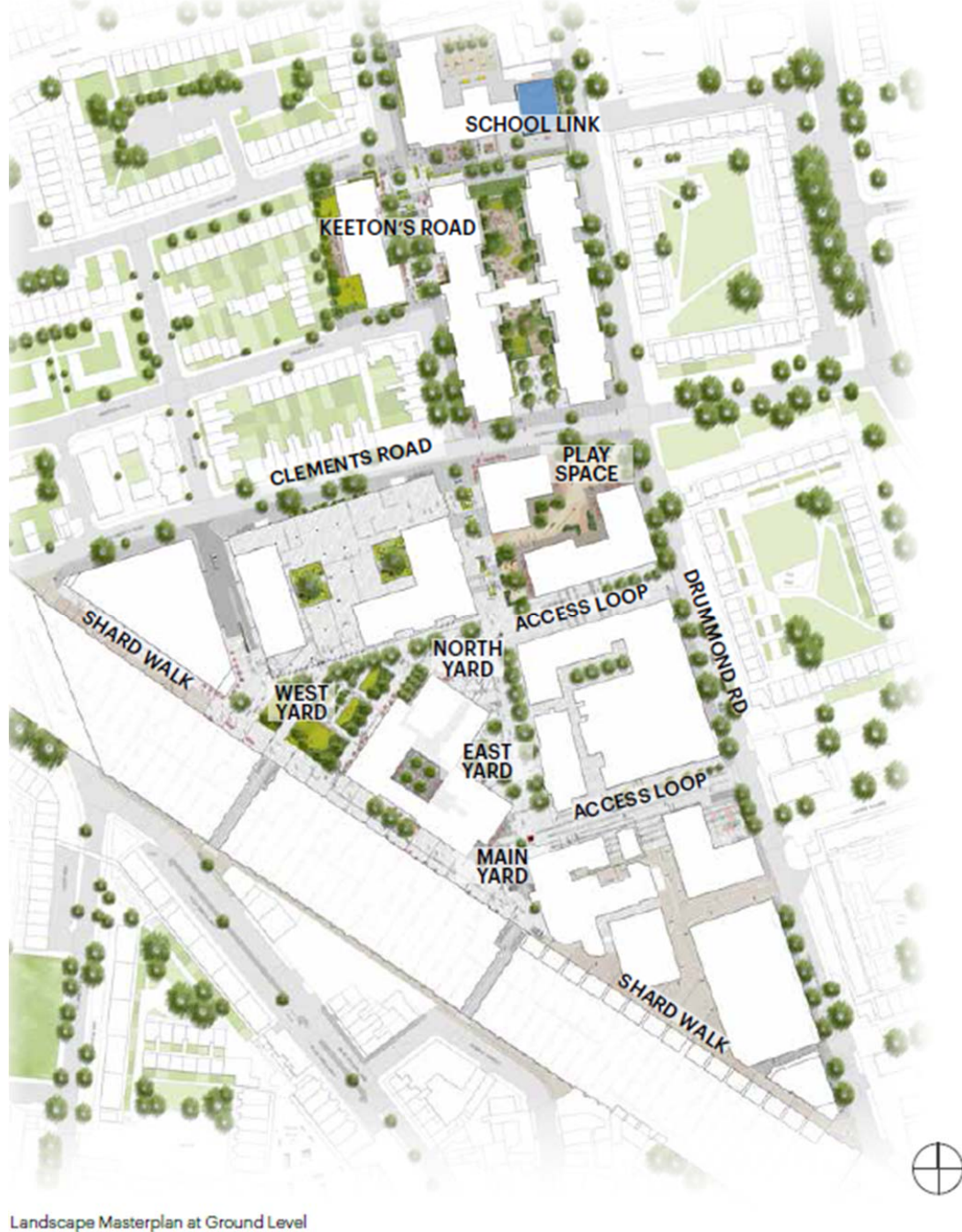
333. Saved policy 3.13 'Urban Design', states that in designing new developments, consideration must be given to townscape, local context and character. Emerging policy P12 of the New Southwark Plan 'Design Quality' states that development must provide amongst other criteria high standards of design with appropriate fabric, function and composition.
334. The applicants, in the design and layout of the proposed buildings, have placed a strong emphasis on the importance of the building relating to the historic industrial character of the site as well as responding to the existing character of the area, as well as contributing to the place making objectives of the Masterplan and Site Specific Allocation.
335. The material palette varies according to the different townscape role of each plot and its significance within the site and relationship to surroundings. The entrance buildings at the east and west of the proposed Low Line route would act as markers signifying the entrance to the master plan area. The taller elements in centre act as markers of the heart of the site with the largest area of public realm and the pedestrian routes through the tunnels. Every building design is distinct in its overall materiality and detailing whilst other details, such as the metal window frames, are used to give a "common aesthetic" across the site.
336. Should the application be approved additional details of material would be sought by condition prior to the commencement of each phase to demonstrate that the proposed development would be of a high quality.

Public Realm

337. The NPPF places great emphasis on the creation of high quality buildings and places. Paragraph 127 states that planning decisions should ensure that developments include effective landscaping as well as establishing a strong sense of place.
338. Policy 7.5 of the London Plan states that development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way around.
339. The public realm and landscaping form a prominent part of the proposed development. The applicants have worked with two landscape architecture practices (Arup and Andy Sturgeon Design) to develop the proposals for the public realm and to create a distinctive character that complements the proposed buildings and also integrates well with the existing public realm surrounding the site. A strong emphasis has been placed on referring to the historical use of the site within the proposed landscaping.
340. Key features of the proposed public realm include:
- Four linked "yards" (West Yard, North Yard, East Yard and Main Yard) in the centre of the site around the proposed towers on Plot BF – RST and adjacent to retained Plot BF – F.
 - The creation of a new pedestrian route through the site linking Webster Road to Keeton's Road and providing a direct route to Bermondsey Tube Station.
 - The provision of a new 670sqm play space on Plot BF - OPQ.
 - Facilitating the extension of the Low Line along side the railway viaduct
 - The provision of 140 new trees across the masterplan site.
 - The provision of a publically accessible roof terrace
 - Two new pedestrian links through the railway viaduct.

341. Image 15 below provides an overview of the proposed landscape masterplan at the ground floor level.

Image 15 – Proposed Landscape Masterplan at the Ground Floor Level



342. The principal area of public realm within the site is the West Yard between Plots BF – RST and Plot BF – F. This has an area of approximately 2500sqm. The features of this space include spill out space for ground floor retail uses, raised lawns, a sculpture (shown to be a representation of a water tower that was once located on this site) and 150sqm of children's play space. To the south west is the western tunnel through the viaduct which will provide a pedestrian link to The Blue. The public realm will also link with the ground floor commercial space of Plot BF-F and controlled pedestrian route through the retained building to link with Webster Road and Keeton's Road. This area is envisaged as a space which will form the heart of the proposed masterplan while

also forming a suitable setting and contribution to landscaping for the tall buildings around this space. This space will receive good levels of sunlight and will also provide areas of seating, tree planting and lawns.

343. East Yard (1000sqm) and North Yard (560sqm) are both smaller spaces around plot BF - RST. These areas would have a different character from the West Yard with more hardstanding and some tree planting. The North Yard would be the arrival point at the heart of the site for the pedestrian route from Bermondsey Tube. It is largely paved with some fixed seating around the edges. It is envisaged that this space could provide space for holding community/resident-led events. The East Yard would be situated on the east side of the tallest tower and the north side of the smaller tower on Plot BF – RST. There would be some seating/spill out space for the commercial units and 6 trees. This space would not receive high levels of sunlight and would therefore play a different role than the larger West Yard.
344. The Main yard would have an area of 600sqm and would be situated between plot BF – RST and the outline plot BF – U&V. This space would adjoin the Low Line along with the southern tunnel through the viaduct. It would be predominantly hard standing and would be covered with a canopy to provide shelter and mitigate against the effects of wind around the taller buildings.
345. The Low Line would also be an important part of the public realm for the masterplan site with commercial uses within plots backing onto this having spill out space at the ground floor. The Low Line would also provide a servicing route through the site. Landscape interventions along this space are limited given the provision of active frontages, spill out space and servicing requirements of adjoining commercial uses.
346. There would also be a significant area of public realm around the two blocks on Plot BF – OPQ providing approximately 1650sqm of public realm referred to as Keeton's Yard. This space would include two play areas one of approximately 530sqm and the other of approximately 200sqm in front of the commercial unit of Block Q. The rest of this space will be laid out with a mix of soft landscaping, hard standing and seating. Space for the provision of a cycle docking station is identified directly to the north of the larger play park adjacent to Clements Road
347. In addition to the ground floor public realm there is also a public roof terrace on building BF-F providing 696sqm of public amenity space with excellent views towards Central London. The operational requirements of the public garden, including opening hours, would be secured by legal agreement to ensure it remains publically accessible and at no cost to the general public, if the application were to be approved.
348. The public realm throughout the Campus area of the Masterplan is of a different character to the more formal areas throughout the Biscuit Factory site. With the exception of the existing section of Webster Road and a small section of Keeton's Road, it would be predominantly pedestrianised with new pedestrian routes between plot BC – 5 and BC – 1234 and also between the replacement school (Plot BC – 6) and Plot BC – 1234. A square referred to as Salter Square with an area of approximately 500sqm is proposed on the southern part of Plot BC – 1234. This would provide an area of hard standing with tree planting and seating directly in front of the entrance to the proposed community use.
349. The public realm across the masterplan area is considered to be of a high quality and would make an important contribution towards establishing a strong sense of place for the development. Each would provide space for different types of activity as well as providing outdoor space for the ground floor commercial uses. The provision of the public roof garden would be a key public benefit of the development, and there would

be improvements to movement around the site with the opening up of the Low Line, the two tunnels through the viaduct and the link to Keeton's Road. However given the high proportion of retail and other commercial uses within the development and within the neighbouring Workspace and Railway Arches there would be pressure placed on the remaining roads and servicing routes through the site for servicing and deliveries, which could potentially impact on the quality of the pedestrian and cyclist experience (this will be covered further in paragraphs 506-520 below).

350. The child play space provision was a key consideration for officers and the DRP during the pre-application process. The applicants originally proposed to accommodate all child play space provision on plot BF-OPQ, however following concerns raised in relation to the limited sunlight available to this space the applicants introduced two additional areas of play space, one in West Square and another smaller space adjacent to the pedestrian route between Plots BF-F and BF-OPQ.
351. The proposal would provide 1000sqm of dedicated child play space within the public realm. This along, with provision within communal amenity space, would exceed the minimum child play space requirements for the development for 0-11 years of age and this is a significant benefit of the scheme. The largest of the three play areas is situated to the north east of the buildings on Plot BF-OPQ and would provide an area of 500sqm of dedicated child play space for 5-11 year olds. A second area of 200sqm is proposed to the west of Block BF-Q to cater for 0-4 year olds. The third area forms part of the wider public realm within West Yard and would provide 300sqm of dedicated play space for 0-4 year olds. These spaces would be publically accessible and therefore are considered to deliver wider benefits to the local community.
352. In conclusion, the public realm, open space and play provision on the site is both generous and high quality, as well as having a distinctive design in reference to the history of biscuit making on the site. This would comply with the expectations of the site allocation within the NSP and policy SP12 of Southwark Core Strategy.

The Design Review Panel

353. The Design Review Panel are a collection of independent design professionals who reviewed this scheme on four occasions during the pre-application discussions. The overall proposal was reviewed in April and again in closer detail in June 2017. In August 2017 the Panel focussed on the school and public realm. The final review was in September 2017 when the overall proposal was considered again and went on to become the submitted scheme. To assist the review process a dedicated Panel including a landscape architect and a school specialist was drawn from the Southwark DRP and they reviewed the scheme throughout the pre-application process to ensure consistency and continuity.
354. The Panel were able to request specialist reports and heard evidence from, among others, the School Head Teacher and others from the client team. In their conclusion the Panel generally endorsed the proposal and felt that, in the main, the principles of the Masterplan were encouraging. They considered this an engaging piece of place-making.
355. In particular the Panel enjoyed the fact that the design team had referred back to the original Biscuit Factory spaces and yards when they had arranged the buildings in the Masterplan. They felt the link to the original Biscuit factory spaces should be embedded in the proportions, planting and materiality of the proposed spaces.
356. Whilst they were generally comfortable with the arrangement of buildings and their scale the Panel raised concerns about some of the public realm, where some of the

effects on the sunlight / daylight and wind were challenging, but overall they felt the scheme was of a high architectural quality, which they endorsed.

Conclusion on Design

357. The development would bring back into use an existing underutilised industrial site, while retaining and opening up one of the defining buildings of the Biscuit Factory site (building BF-F). The layout of the development would integrate well with the surrounding streets providing improved pedestrian links from the site to Bermondsey Underground Station and Jamaica Road, through the viaduct to the south towards the Blue shopping centre and providing the opportunity for the enhancement of the Low Line route. There would be a significant increase in areas of public realm across the site with the provision of a publically accessible roof terrace on Block BF-F and 1000sqm of child play space at the ground floor level, and a net increase in tree canopy coverage across the site. The taller elements of the proposed development would be situated towards the centre of the site and away from neighbouring residential properties, but the scale of proposed development overall would exceed that of surrounding areas particularly the lower density housing to the north west. This, however, is not considered to be of such prominence as to cause significant harm to the character of the area or the setting of neighbouring heritage assets. While there are concerns with regards to the proposed residential quality, the architecture and form of the proposed development are considered to be of a high quality and would have the potential to provide an exemplary quality of accommodation. Accordingly the proposed development is considered to be of an acceptable design. The design would therefore comply with the expectations of the site allocation and the relevant aspects of emerging policy P12 of the New Southwark Plan and policy SP12 of Southwark Core Strategy.

Trees and Soft Landscaping

358. There a number of prominent trees situated around the site particularly on Drummond Road, Webster Road and Keeton's Road, as well as 4 prominent specimens within the site to the east of existing block BF-F. These trees make a positive contribution to the streetscene and are a characteristic feature of the local area. Planning policies relating to trees and landscaping seek to protect, maintain and enhance existing trees. The proposed development has been designed to preserve the majority of existing trees but the scale and location of the proposed development will require the removal and management of some existing trees. However, there will be significant increases in the provision of soft landscaping and tree planting throughout the Masterplan area that would have a positive impact on the character of the area and Officers have worked closely with the applicants to ensure that more trees are retained and enhanced post development.
359. London Plan Policy 2.18 states that enhancements to London's green infrastructure should be sought from development. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into the wider network. Emerging New London Plan policy G7 states that development proposals should ensure that wherever possible, existing trees of quality are retained. The Council's emerging policy P60 also requires the retention and enhancement of the Borough's trees and canopy cover.
360. An Aboricultural Impact Assessment (AIA) has been submitted with the application and was updated and submitted with additional amendments in June. This considers the impact of the proposals on existing trees within and around the proposed development site. The amendments were submitted following concerns raised in relation to the loss of street trees particularly on Drummond Road and the extent of

pruning and crown reduction required for those retained. There are no existing Tree Preservation Orders in place for trees on the Site.

361. The AIA identifies that there are currently 99 trees or groups of trees on or adjacent to the site. These have been categorised and there is one category A (high quality) tree, 34 category B (moderate quality) trees, 53 category C (low quality) trees and 12 U category (not suitable for retention) trees. Of these there would be 1 category B tree removed, 10 category C trees and 7 category U trees removed. The one category B tree to be removed would be on-site where Block BF-P is proposed. During the pre-application discussions the layout of buildings on Plot BF-OPQ was amended so that 3 out of the 4 category B trees on the site would be preserved.
362. There are 3 street trees proposed for removal along Drummond Road. This includes 1 adjacent to the proposed school sports hall and 2 adjacent to the Low-Line access point next to building BF-W. The removal of these is required to accommodate the sports hall and the access arrangements to the Low-Line. During the course of the application the applicants made further amendments to the building line of building BC-1234 along Drummond Road to ensure the retention of more street trees and to provide suitable separation distance between existing trees and the proposed building to accommodate future growth in accordance with existing street trees maintenance programmes.
363. In addition to the trees that would be removed there would also be a number of street trees that would require management in the form of crown lifting and pruning. During the course of the application the applicants have amended the building line and re-positioned balconies to accommodate growth in existing trees and to seek to ensure that the street trees can be maintained in accordance with existing pruning cycles of every 3-5 years. There will therefore be some loss of existing landscaping and a reduction in scale of some existing street trees around the site.
364. However the proposed development includes the planting of 142 new trees across the site and on adjoining streets. This would include 8 new trees along Drummond Road, 2 trees just off Drummond Road within the new play area but with a street presence, one new tree on Clement's Road and 4 more within the boundary of the site but again with street presence. This would result in a significant increase in the number of trees across the site, which is currently predominantly hard landscaped. The applicants approach to tree planting has been informed by three key principles of preserving local tree species, reinforcing the existing network of tree planting and enriching the existing tree network to enhance local biodiversity/green infrastructure
365. In addition to the proposed tree planting the applicants are also proposing to maximise the use of roof space for soft landscaping which would contribute towards communal and visual amenity. Biodiverse roofs would be included with grasses, wild flowers, as well as mounds of earth and log piles to provide additional habitats for invertebrates and birds. Should planning permission be approved further details would be required by condition to demonstrate how these would be provided and maintained. In addition to this conditions would also have to be attached to ensure that existing trees are appropriately protected during demolition and construction.
366. The proposed development would result in the loss of some trees and the management of retained trees however there would be appropriate levels of tree planting across the Masterplan site to mitigate the loss of existing trees. The proposed development would result in a net increase in canopy coverage as a result of the proposed planting. In addition to the tree proposals there are also increases in soft planting throughout the site and proposals to incorporate bio-diverse and green roofs on all plots across the development site.

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

367. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.
368. Strategic policy 13 of the Core Strategy 'High environmental standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work; saved policy 3.2 of the Southwark Plan states that permission will not be granted for development where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
369. Concerns have been raised by neighbouring residents and local groups that the level of residential accommodation proposed would lead to significant overcrowding in the area and an unacceptable impact upon local services. These matters are considered in the transport and community infrastructure levy sections of this report.

Impact of the proposed uses

370. The school includes an outdoor MUGA on the roof and an undercroft area which could also be used for games and other activities. If the application were to be approved further details of a community use scheme would be sought by condition or section 106. This would also need to include measures to control the hours of use and mitigate against any potential noise disturbance for the residents of neighbouring residential properties. Furthermore the commercial uses within the site are all situated below proposed residential use and many are opposite existing residential properties. Again if the application were to be approved conditions controlling the hours of use and noise would be required to ensure that the proposed uses did not unduly harm the amenity of prospective or neighbouring residents.

Impact of the proposed buildings

Privacy and Overlooking

371. Concerns have been raised by neighbouring residents that the proposed development would result in an unacceptable loss of privacy to neighbouring dwellings. Concerns have also been raised regarding loss of a view and impact upon property values, but these are not material planning considerations and cannot be taken into account.
372. In order to maintain privacy the Council's Residential Design Standards SPD recommends a minimum separation distance of 12m between the fronts of buildings and any buildings which front a highway, and a minimum of 21m at the rear.
373. The buildings on the development site would maintain policy compliant separation distances between buildings in most instances. The exception is between block BC-5 and nos 86-96 Webster Road and No. 21 Collett Road, and between the proposed

school and Flannery Court.

Webster Road

374. The properties at Nos. 57-69 Webster Road (Even) share a rear boundary with the building proposed for plot BC-5. The distance from the rear elevation of the proposed building BC-5 and the boundary with the rear gardens of these properties is 9.6m at the closest point and 15.33m at the furthest point. In terms of the distance between the rear elevations of BC-5 and the above buildings these will be 15.11m at the closest point and 24.4m at the furthest point from the rear elevation of the building on Plot BC-5. The units which are within 21m are nos. 57, 59, 61, 63 and 69. The closest distances occur where the properties on Webster Road have been extended on the ground floor at numbers 57, 61 and 69.
375. The guidance states that where these distances are not met the applicants must provide justification through the Design and Access Statement. The Design and Access Statement describes the relationship with neighbouring properties. In addition to this officers note that the distances have not been met as a result of the short gardens of these houses and therefore the close proximity of the rear elevations to their rear boundary. While there will be some additional overlooking and loss of privacy the proposed building would be almost 10m from the rear boundary of plot which is in keeping with the separation distances that are predominantly found in this area, and greater than the depth of the existing rear gardens. In addition to this planting is proposed along the boundary and along with existing mature landscaping within neighbouring gardens would help mitigate against any harm from overlooking. It should be noted that the existing buildings to be demolished on the Campus site, while non-habitable, are situated very close to the boundary with these properties. The increased separation distance between buildings and the depth of proposed rear garden on BC5 would ensure that appropriate separation distances are maintained between the proposed development and neighbouring existing buildings.

Collett Road

376. The flank wall of No. 21 Collett Road would be between 13.3 and 12.4m from the rear elevation of proposed building BC-5. This is a significant improvement on the existing situation where there is a building on site between 3.5 and 2.2m from this same elevation. There is one window in the flank wall of No. 21 Collett Road however this is thought to be non-habitable and therefore there would no loss of privacy. The rear elevation would be situated between 9.6m and 9.8m of the rear garden of this property. Therefore there would be some loss of privacy for the residents of this unit. However as set out above the garden depth of BC-5 is considered to be in keeping with the character of the area. The applicants have also proposed landscaping along the boundary within their site which would also help mitigate against any harm. If the application were to be approved full details of landscaping would be secured to ensure this was the case.

Flannery Court, Tranton Road/Drummond Road

377. This residential block is situated to the north of the proposed school and forms the northern boundary of the Campus Site. The building has south and west facing elevations which face towards the proposed school building. The proposed school building would step up away from the rear elevation of the Tranton Road section. At its closest point the proposed building would be 8.5m from the rear elevation. While this would not comply with the separation distances there would be no facing habitable room windows and therefore no detrimental loss of privacy for residents of Flannery Court. The southern flank wall of Flannery Court contains no habitable room

windows and would be situated 1.87m from the flank wall of the proposed school on Drummond Road, which would also have no flank wall windows. There will be an acceptable impact in terms of privacy on the residents of Flannery Court.

Daylight, sunlight and overshadowing

Daylight

378. The impact of the proposed development on neighbouring residents has been a significant concern of local residents. The applicants involved daylight and sunlight consultants during the pre-application process and have stated that alternative designs were considered to optimise development on site while also seeking to minimise local impacts. A full daylight and sunlight assessment has been submitted with the application. The conclusions of this stated that the majority of the surrounding properties do not experience substantial adverse effects and are therefore acceptable within the BRE Guidelines. While there are some impacts on the existing buildings surrounding the Campus Site and the north east corner of the Biscuit Factory Site, this need to be weighed up against the material benefits of the proposed development. Given the level of public concern regarding this issue the Council instructed their own daylight and sunlight consultants, Delva Patman Redler, to review the Daylight and Sunlight Assessment.
379. Delva Patman Redler conclude that the applicant has undertaken an extensive and detailed assessment of the effects of the proposed development on daylight and sunlight to the existing neighbouring residential buildings and back gardens and amenity spaces in accordance with the methodology recommended in the BRE guidelines. They note that while there are a quite a number of effects that exceed the BRE guidelines. However they note that these are only guidelines and that the guide should be applied flexibly. In reviewing the arguments of the applicants daylight consultants in support of the proposed impacts they note that the justification arguments that have been put forward regarding the self-obstruction of windows by existing balconies and the retained levels of light being adequate for an inner urban environment. Whilst these arguments would not cover the material impacts to Lockwood Square West, Marden Square West and 9-12 & 14-15 Salisbury Court, which would be left with some inadequately lit rooms, it is for the council to decide whether flexible application of the guidelines and the recommendations of the Mayor's Housing SPG warrants acceptance of the proposals.
380. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
381. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy.
382. The BRE sets out three detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight (VSC) can be reduced by about 20% of the original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows:

Table 14 Level of Impact on loss of VSC

Reduction in VSC	Level of impact
0-20%	Insignificant
20-29.99%	Minor adverse
30-39.99%	Moderate adverse
40% +	Substantial adverse

383. This is supplemented by the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.
384. In considering the impact upon sunlight, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. The BRE guidelines require that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than a 20% loss of its former value.
385. The Mayor of London's 'Housing SPG' (March 2016) advises that the BRE guidelines should be applied with an appropriate degree of flexibility and sensitivity to higher density housing development, especially in opportunity areas, town centres, large sites and accessible locations. It suggests that account should be taken of local circumstances, the need to optimise housing capacity and scope for the character and form of an area to change over time.
386. The ES considers the impact on VSC for the following neighbouring buildings:
- Flannery Court
 - 2 Collett Road
 - 4 Collett Road
 - 1-7 New Concord House
 - 97-103 (odd) St James Road
 - 12-31 (odd) Clement's Road
 - 6, 6a, 16-34 (even) Webster Road
 - 57-67 (odd) Webster Road
 - 86-94 (even) Webster Road
 - 92 Storks Road
 - 40 Keeton's Road
 - Lockwood Square West
 - Lockwood Square North
 - Lockwood Square East
 - Lockwood Square South
 - Marden Square West
 - Marden Square North
 - Marden Square East
 - Marden Square South
 - Layard Square West
 - Layard Square North
 - Layard Square East
 - 325 Southwark Park Road
 - 23-29 Blue Anchor Lane (odd)
 - 35 Blue Anchor Lane
 - 1-16 Alfred Court
 - 1-17 Salisbury Court

387. The daylight report has considered a large number of rooms around the site. It assessed 3,119 residential windows serving 2192 rooms. Of the 3,119 windows assessed, 2,504 (80%) would satisfy the BRE recommended levels for VSC.
388. Of the 2,192 rooms assessed, 1,965 (81%) would meet the BRE standards for NSL. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings. The following paragraphs of the report consider those properties which would be adversely affected by the proposed development in terms of daylight and sunlight

Sunlight

389. In considering the impact upon sunlight, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. BRE guidelines require that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. A room will be adversely affected if the resulting sunlight level is less than the recommended standards and reduced by more than 20% of its former values and if it has a reduction in sunlight received over the whole year greater than 4% of APSH.
390. The existing levels of daylight, sunlight and overshadowing have been calculated in the baseline condition using the appropriate BRE assessment methodology.
391. The applicants tested for impact of the proposed development on sunlight to 1829 windows. 1656 (91%) of the windows would comply with the requirements of the BRE guide for both APSH and WPSH. A total of 153 windows would not comply with the BRE guidelines for APSH while 113 would not comply with WPSH.
392. Of the windows that would not comply with APSH 28 would experience a reduction of between 20-30%, 10 would experience a reduction of between 30-40% and 105 would experience a reduction of over 40%. Of the windows that would not comply with WPSH 1 would experience a reduction of between 20-30%, 2 would experience a reduction of between 30-40% and 110 would experience a reduction of over 40%.
393. The properties with windows which would experience a reduction in APSH above BRE guidelines are set out in the table below:

Table 15 – Impacts on APSH for neighbouring residential properties

Address	20-30% Reduction	30-40% Reduction	>40% Reduction	Total
1-54 Flannery Court	5	1	23	29
Marden Square West	0	0	26	26
Lockwood Square West	0	0	25	25
Layard Square West	0	0	15	15
Lockwood Square North	6	2	2	10
9-12 Salisbury Court	0	0	8	8
1-4 Salisbury Court	2	3	1	6
5-8 Salisbury Court	5	1	0	6
325 Southwark Park Road	4	2	0	6
Lockwood Square South	3	0	2	5
Lockwood Square East	1	0	2	3
88 Storks Road	1	0	0	1

90 Storks Road	1	0	0	1
97-99 St James' Road	0	1	0	1
1-8 Wesley Court	0	0	1	1
Total	28	10	105	143

394. The properties with windows not complying with the BRE guidelines for WPSH are:

Table 16 – Impacts on WPSH for neighbouring residential properties

Address	20-30% Reduction	30-40% Reduction	>40% Reduction	Total
Lockwood Square West	0	0	20	20
1-54 Flannery Court	0	0	20	20
Marden Square West	0	1	18	19
9-12 Salisbury Court	0	0	8	8
1-4 Salisbury Court	0	0	8	8
5-8 Salisbury Court	0	1	7	8
14-15 Salisbury Court	0	0	4	4
16-17 Salisbury Court	0	0	4	4
88 Storks Road	0	0	3	3
Lockwood Square East	0	0	3	3
86 Storks Road	0	0	2	2
92 Storks Road	0	0	2	2
1-7 New Concord House	0	0	2	2
13 Clements Road	0	0	1	1
25 Clements Road	0	0	1	1
29 Clements Road	0	0	1	1
6 Webster Road	0	0	1	1
84 Storks Road	0	0	1	1
6a Webster Road	0	0	1	1
90 Storks Road	0	0	1	1
325 Southwark Park Road	0	0	1	1
1-8 Wesley Court	0	0	1	1
Marden Square East	1	0	0	1
Total	1	2	110	113

The impacts on daylight and sunlight for the impacts properties is set out and assessed below.

Flannery Court

395. This building is an L-shaped block of flats situated to the north east of Plot BC-6 (the new school) on the Campus site. The residential units within this block have overhanging balconies which run along the rear elevation of the building facing towards the application site. Of the 158 windows tested 98 would fail to meet the BRE criteria for VSC as a result of the proposed development. 27 would see a reduction of between 2-30%, 9 would see a reduction of 30-40% and 62 would see a reduction of over 40%. The rooms with the biggest impacts are those situated on the lower floors where there are already very low VSC figures. Where there are already very low VSC levels even a small decline in VSC appears as a very high proportionate decline.

396. The BRE guidelines in paragraph 2.2.11 notes:

Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight for both the existing and proposed situations within the balcony in place.

397. The applicants have undertaken a *No-balconies* test to examine the impact of the existing balconies on the loss of light. This found that if the balconies were removed then 148 of the 158 windows would meet the BRE guidelines and of the 10 rooms which did not comply the impact of the proposed building on VSC levels would be between 20-30% decline.
398. The no-skyline test assessed the impact of the proposed development on 87 rooms. Of these 43 out of 87 would fail to comply with BRE guidelines. 5 rooms will experience a minor reduction (20-30%), 9 would experience moderate reductions and 30 would experience reductions in excess of 40%. The rooms that are worst affected are predominantly located at the lower floors. The *No-balconies* test undertaken demonstrates that 56 of the 87 rooms would comply if there were no balconies to Flannery Court. Of those that would not comply 14 would experience a minor reduction, 15 would experience a moderate reduction and 2 would experience a major reduction.

Sunlight

399. Flannery Court has the highest number of windows which would not comply with BRE guidelines in relation to both APSH and WPSH with the majority of these windows experiencing a reduction of over 40%. However 77% of the windows tested would comply with the BRE guidelines in relation to both. The applicant's consultants have also undertaken the *No Balconies* test which assesses the impact if the properties affected did not have balconies. If this was undertaken then 131 out of 142 windows would comply with APSH. Therefore while it is noted that there will be noticeable reductions in both APSH and WPSH to windows on Flannery Court a larger proportion of sunlight is lost as a result of the existing projecting balconies on Flannery Court rather than as a result of the proposed development.

Lockwood Square West

400. This is a four storey block with facing habitable room windows on its west elevation that would be situated opposite the proposed residential block on Plot BC-1234. Floor plans that the applicants have obtained from the planning portal and estate agency websites indicate that the windows serve secondary bedrooms and kitchens.
401. Of the 40 windows tested all 40 would fail to meet the BRE criteria for VSC as a result of the proposed development and all would experience VSC reductions of over 40%.
402. The no-skyline test assessed the impact of the proposed development on 40 rooms. Of these 39 out of 40 would fail to comply with BRE guidelines. 5 rooms will experience a minor reduction (20-30%), 4 would experience moderate reductions and 30 would experience reductions in excess of 40%.

Sunlight

15 out of the 40 windows tested would comply with the BRE guidelines for sunlight. Of the 25 that do not comply these would all experience reductions of over 40% of APSH. These reductions appear significant as a result of the existing low baseline

figure for APSH to these windows, which in turn is a result of the orientation of the windows only just within 90 degrees of due south. The reductions predominantly affect kitchens and bedrooms which are considered to be less sensitive than living rooms in the BRE Guidance.

Marden Square West

- 403. This is a seven storey block with facing habitable room windows on its west elevation that would be situated opposite the proposed residential block on Plot BC-1234. Floor plans that the applicants have obtained from the planning portal and estate agency websites indicate that the windows serve secondary bedrooms and kitchens.
- 404. Of the 76 windows tested 65 would fail to meet the BRE criteria for VSC as a result of the proposed development. 1 would see a reduction of between 20-30%, 1 would see a reduction of 30-40% and 63 would see a reduction of over 40%. The rooms with the biggest impacts are those situated on the lower floors where there are already very low VSC figures.
- 405. The no-skyline test assessed the impact of the proposed development on 76 rooms. Of these 41 out of 76 would fail to comply with BRE guidelines. 11 rooms would experience a minor reduction (20-30%), 2 would experience moderate reductions and 28 would experience reductions in excess of 40%.

Sunlight

- 406. 50 out of the 76 windows tested would comply with the BRE guidelines for sunlight. Of the 26 that do not comply these would all experience reductions of over 40% of APSH. These reductions appear significant as a result of the existing low baseline figure for APSH to these windows, which in turn is a result of the orientation of the windows only just within 90 degrees of due south. The reductions predominantly affect kitchens which are considered to be less sensitive than living rooms in the BRE Guidance.

Layard Square West

- 407. This is a seven storey block with facing habitable room windows on its west elevation that would be situated opposite the Workspace Building on the southern end of Drummond Road. Floor plans that the applicants have obtained from the planning portal and estate agency websites indicate that the windows serve secondary bedrooms and kitchens.
- 408. Of the 54 windows tested 45 would fail to meet the BRE criteria for VSC as a result of the proposed development. 8 would see a reduction of 30-40% and 37 would see a reduction of over 40%. The rooms with the biggest impacts are those situated on the lower floors where there are already very low VSC figures.
- 409. The no-skyline test assessed the impact of the proposed development on 54 rooms. Of these 7 out of 54 would fail to comply with BRE guidelines. The 7 rooms would experience a minor reduction (20-30%).

Sunlight

- 410. 39 out of the 54 windows (72%) tested would comply with the BRE guidelines for sunlight. Of the 15 that do not comply these would all experience reductions of over 40% of APSH. These reductions appear significant as a result of the existing low baseline figure for APSH to these windows, which in turn is a result of the orientation

of the windows only just within 90 degrees of due south. The reductions predominantly affect kitchens and bedrooms which are considered to be less sensitive than living rooms in the BRE Guidance. It should be noted that these windows would comply with BRE Guidelines in relation to Winter APSH. The impact on these windows is considered acceptable in terms of daylight and sunlight.

Wesley Court, Webster Road

- 411. This is a modern 4 storey block with facing habitable room windows on its north and east elevation that would be situated opposite the proposed residential blocks on Plot BC-5 and BC-1234.
- 412. Of the 48 windows tested 31 would fail to meet the BRE criteria for VSC as a result of the proposed development. 4 would see a reduction of between 20-30%, 6 would see a reduction of 30-40% and 21 would see a reduction of over 40%.
- 413. The no-skyline test assessed the impact of the proposed development on 32 rooms. Of these 16 out of 32 would fail to comply with BRE guidelines. 7 rooms would experience a minor reduction (20-30%), 3 would experience moderate reductions and 6 would experience reductions in excess of 40%.

Alfred Court, Bombay Street

- 414. This is a modern part 4/part 5/part 6 storey block with facing habitable room windows on southern side of the railway viaduct opposite plot BF-RST.
- 415. Of the 67 windows tested 7 would fail to meet the BRE criteria for VSC as a result of the proposed development. All would experience a reduction of over 40%. The absolute percentage for each window is less than 1.3% but appears as a high percentage loss as a result of the very low existing VSC levels.
- 416. The no-skyline test assessed the impact of the proposed development on 36 rooms. All of these would comply with BRE guidelines.

88 Webster Road

- 417. This is a three storey terraced property situated on the west side of Webster Road, facing plot BC-1234 to the east. The ground floor windows serve a Living Kitchen Diner while the upper floor rooms are assumed to be bedrooms.
- 418. Of the 7 windows tested 6 would fail to meet the BRE criteria for VSC as a result of the proposed development. All 6 would experience a reduction of over 40%. The high percentage decline results from the high baseline VSC levels as a result of them facing towards a relatively under developed site. The windows would retain VSC levels of between 15.2%-26.7%.
- 419. The no-skyline test assessed the impact of the proposed development on 4 rooms. Of these 3 would fail to comply with BRE guidelines. Two of these rooms would experience a minor reduction (20-30%) while one room would receive a moderate reduction of between 30-40%.

27-29, Blue Anchor Lane

- 420. This is a 4 storey block with facing habitable room windows on southern side of the railway viaduct opposite plot BF-R,S,T.

421. Of the 98 windows tested 36 would fail to meet the BRE criteria for VSC as a result of the proposed development. 16 would see a reduction of between 20-30%, 14 would see a reduction of 30-40% and 6 would see a reduction of over 40%. Of the 36 which do not meet the BRE guidelines 30 are assumed to serve bedrooms which are considered to be less sensitive than living rooms, dining rooms and kitchens in terms of access to daylight.
422. The no-skyline test assessed the impact of the proposed development on 55 rooms at this property. Of these 4 out of 55 would fail to comply with BRE guidelines. 2 rooms would experience a minor reduction (20-30%), and 2 would experience reductions in excess of 40%. Again the windows which do not meet the criteria are assumed to serve bedrooms, which again are less sensitive than living rooms and kitchens.

86 Webster Road

423. This is a three storey terraced property situated on the west side of Webster Road, facing plot BC-1234 to the east. The ground floor windows serve a Living Kitchen Diner while the upper floor rooms are assumed to be bedrooms.
424. Of the 8 windows tested 5 would fail to meet the BRE criteria for VSC as a result of the proposed development. All 5 would experience a reduction of over 40%. The high percentage decline results from the high baseline VSC levels as a result of them facing towards a relatively under developed site. The windows would retain VSC levels of between 15.2%-26.7%.
425. The no-skyline test assessed the impact of the proposed development on 6 rooms. Of these 5 would fail to comply with BRE guidelines. One of these rooms would experience a minor reduction (20-30%), two rooms would receive a moderate reduction of between 30-40% and two rooms would receive a major reduction of over 40%.

New Concord House, Webster Road

426. This is a four storey building situated on the corner of Webster Road with Clement's Road. It has windows in elevations facing east towards plot BC-1234 and south towards plot BF-F. Due to lack of information on the internal layouts of the building assumptions have been made with regards to the rooms each window serves.
427. Of the 28 windows tested 20 would fail to meet the BRE criteria for VSC as a result of the proposed development. 2 would experience a minor reduction, 13 would experience a moderate reduction and 5 would experience a major adverse reduction in VSC levels. The high percentage decline results from the high baseline VSC levels as a result of them facing towards a relatively under developed site. The windows would retain VSC levels of between 16.7%-27%.
428. The no-skyline test assessed the impact of the proposed development on 18 rooms. Of these 4 would fail to comply with BRE guidelines. Two of these rooms would experience a minor reduction (20-30%) and two rooms would receive a major reduction of over 40%.

90 Webster Road

429. This is a three storey terraced property situated on the west side of Webster Road, facing plot BC-1234 to the east. The ground floor windows serve a Living Kitchen Diner while the upper floor rooms are assumed to be bedrooms.

430. Of the 6 windows tested 5 would fail to meet the BRE criteria for VSC as a result of the proposed development. All 5 would experience a reduction of over 40%. The high percentage decline results from the high baseline VSC levels as a result of them facing towards a relatively under developed site. The windows would retain VSC levels of between 15.7%-22.1%.
431. The no-skyline test assessed the impact of the proposed development on 4 rooms. Of these 3 would fail to comply with BRE guidelines. Two of these rooms would experience a moderate reduction (30-40%), the remaining would receive a major reduction of over 40%. As highlighted above, the property currently faces an underdeveloped low density site and therefore currently enjoys an unobstructed view of the sky dome, thus making the rooms more susceptible to change in daylight levels as a result of the proposed development.

Lockwood Square North

432. This is a seven storey residential block situated to the east of the Campus site.
433. Of the 120 windows tested all 38 would fail to meet the BRE criteria for VSC as a result of the proposed development. 21 would experience a minor reduction, 12 would experience a moderate reduction and 5 would experience a major adverse reduction in VSC levels. The existing rooms do not face directly onto the proposed development site however as a result of their existing low VSC levels small actual declines in VSC appear as high overall percentage reductions.
434. The no-skyline test assessed the impact of the proposed development on 72 rooms. Of these 2 out of 72 would fail to comply with BRE guidelines. The 2 rooms would experience a minor reduction (20-30%).

Sunlight

435. 86 out of the 96 windows (90%) tested would comply with the BRE guidelines for both WPSH and APSH. Of the 10 that do not comply these would all experience reductions in relation to APSH. 6 would experience a reduction of between 20-30%, 2 would experience a reduction of 30-40% and 2 would experience a reduction of over 40%. Of the 10 windows affected 9 would be through living rooms.

Marden Square North

436. This is a seven storey residential block situated to the east of the Biscuit Factory site.
437. Of the 24 windows tested all 18 would fail to meet the BRE criteria for VSC as a result of the proposed development. 9 would experience a minor reduction, 4 would experience a moderate reduction and 5 would experience a major adverse reduction in VSC levels. The existing rooms do not face directly onto the proposed development site however as a result of their existing low VSC levels small actual declines in VSC appear as high overall percentage reductions.
438. The no-skyline test assessed the impact of the proposed development on 24 rooms. Of these 2 out of 24 would fail to comply with BRE guidelines. The 2 rooms would experience a minor reduction (20-30%).

92 Webster Road

439. This is a three storey terraced property situated on the west side of Webster Road, facing plot BC-1234 to the east. The first floor windows are assumed serve a Living

Kitchen Diner while the second floor windows are assumed to be bedrooms.

440. Of the 6 windows tested 4 would fail to meet the BRE criteria for VSC as a result of the proposed development. All 4 would experience a reduction of over 40%. The high percentage decline results from the high baseline VSC levels as a result of them facing towards a relatively under developed site. The windows would retain VSC levels of between 15.7%-22.1%.
441. The no-skyline test assessed the impact of the proposed development on 3 rooms. Of these 2 would fail to comply with BRE guidelines. These rooms would experience a moderate reduction (30-40%). As highlighted above, the property currently faces an underdeveloped low density site and therefore currently enjoys an unobstructed view of the sky dome, thus making the rooms more susceptible to change in daylight levels as a result of the proposed development.

14-15 Salisbury Court

442. This is a two storey residential property located to the north of the Biscuit Factory Site.
443. Of the 10 windows tested 4 would fail to meet the BRE criteria for VSC as a result of the proposed development. All 4 would experience a reduction of over 40%. The high percentage decline results from the high baseline VSC levels as a result of them facing towards a relatively under developed site.
444. The no-skyline test assessed the impact of the proposed development on 6 rooms. Of these 3 would fail to comply with BRE guidelines. These rooms would experience a major reduction (>40%) in daylight distribution. The property currently faces an underdeveloped low density site.

Sunlight

445. None of the 4 windows tested would comply with the BRE guidelines for both WPSH and APSH. Of these all 4 would experience reductions of over 40% in relation to winter WPSH. The rooms affected are assumed to include the main living area at the ground floor level. However while they would not fully comply with the BRE guidelines in relation to sunlight, each of the rooms affected would still receive between 32-37% of APSH.

9-12 Salisbury Court

446. This is a two storey residential property located to the north of the Biscuit Factory Site.
447. Of the 28 windows tested 12 would fail to meet the BRE criteria for VSC as a result of the proposed development. 2 would experience a minor reduction, 7 would experience a moderate reduction and 3 would experience a major adverse reduction in VSC levels. The existing rooms do not face directly onto the proposed development site however as a result of their existing low VSC levels small actual declines in VSC appear as high overall percentage reductions.
448. The no-skyline test assessed the impact of the proposed development on 20 rooms. Of these 2 would fail to comply with BRE guidelines. One of these rooms would experience a minor reduction (20-30%) and one room would receive a moderate reduction (30-40%).

Sunlight

449. 8 out of the 16 windows (50%) tested would comply with the BRE guidelines for both WPSH and APSH. Of the 8 that do not comply these would all experience reductions of over 40% in relation to APSH. Of the 8 windows affected these are all orientated within a few degrees of due west which already limits the amount of daylight these windows currently receive. Four are situated at the ground floor level and four are at the first floor level. While the layout of this property is not known the four upper floor rooms are assumed to serve bedrooms and bathrooms, which according to the BRE guidelines, are less sensitive in terms of sunlight requirements. Two of the windows at the ground floor level are located within the doors to the property and would be assumed to be providing light to circulation space. The two remaining ground floor windows would retain annual APSH levels of 17% and 21%.

2 Collett Road

450. This is a two storey residential property situated to the west of the Campus Site. It has windows facing east towards the school on plot BC-6 and south towards Plot BC-5.
451. Of the 8 windows tested 2 would fail to meet the BRE criteria for VSC as a result of the proposed development. Both would experience a reduction of over 40%. The high percentage decline results from the very low baseline VSC levels, with actual VSC percentage reductions being between 0.4% and 0.7%. The applicant's consultants also assume that the rooms served by these windows are non-habitable.
452. The no-skyline test assessed the impact of the proposed development on 5 rooms. Of these 2 would fail to comply with BRE guidelines. One of these rooms would experience a minor reduction (20-30%) and one room would receive a moderate reduction (30-40%).

94 Webster Road

453. This is a three storey terraced property situated on the west side of Webster Road, facing plot BC-1234 to the east. The first floor windows are assumed serve living room/kitchen/diner while the second floor windows are assumed to be bedrooms.
454. Of the 6 windows tested 4 would fail to meet the BRE criteria for VSC as a result of the proposed development. 2 would experience a moderate reduction in VSC and 2 would experience a reduction of over 40%. The high percentage decline results from the high baseline VSC levels as a result of them facing towards a relatively under developed site. The windows would retain VSC levels of between 19.6%-23.1%.
455. The no-skyline test assessed the impact of the proposed development on 3 rooms. One of these rooms would experience a minor reduction (20-30%) and one room would receive a moderate reduction (30-40%). As highlighted above, the property currently faces an underdeveloped low density site and therefore currently enjoys a relatively unobstructed view of the sky dome, thus making the rooms more susceptible to change in daylight levels as result of the proposed development.

Layard Square South

456. This is a seven storey residential block situated to the east of the Biscuit Factory site on the opposite side of Drummond Road. The building has residential windows facing north and south.
457. Of the 158 windows tested three would fail to meet the BRE criteria for VSC as a result of the proposed development. One would experience a moderate reduction and two would experience a major adverse reduction in VSC levels. The existing rooms do

not face directly onto the proposed development site however as a result of their existing low VSC levels small actual declines in VSC appear as high overall percentage reductions.

458. The no-skyline test assessed the impact of the proposed development on 133 rooms. All of these would comply with BRE guidelines.

New Place Square South

459. This is a seven storey residential block situated to the north east of the Campus site.
460. Of the 142 windows tested six would fail to meet the BRE criteria for VSC as a result of the proposed development. Four would experience a minor reduction and two would experience a major adverse reduction in VSC levels. The existing rooms do not face directly onto the proposed development site however as a result of their existing low VSC levels small actual declines in VSC appear as high overall percentage reductions.
461. The no-skyline test assessed the impact of the proposed development on 80 rooms. All of these would comply with BRE guidelines.

40 Keetons Road

462. This is a two-storey terraced house situated to the west of the Campus site.
463. Of the seven windows tested one would fail to meet the BRE criteria for VSC as a result of the proposed development. This window would experience a reduction of over 40%. The high percentage decline results from the very low baseline VSC levels, with actual VSC percentage reduction being 1.6%. The applicant's consultants also assume that the rooms served by these windows are non-habitable.
464. The no-skyline test assessed the impact of the proposed development on 5 rooms. Of these 1 would fail to comply with BRE guidelines. This room would experience a minor reduction (20-30%) from the baseline.

1-4 Salisbury Court

465. This is a two storey residential property located to the north of the Biscuit Factory Site.
466. Of the 28 windows tested four would fail to meet the BRE criteria for VSC as a result of the proposed development. Three would experience a moderate reduction and one would experience a major adverse reduction in VSC levels.
467. The no-skyline test assessed the impact of the proposed development on 20 rooms. All of these would comply with BRE guidelines.

Sunlight

468. Eight out of the 16 windows (50%) tested would comply with the BRE guidelines for both WPSH and APSH. Of the eight that do not comply these would all experience reductions of over 40% in relation to WPSH while two would experience a reduction of 20-30% APSH, three would experience a reduction of 30-40% APSH and one would experience a reduction of over 40%.
469. Of the windows which do not comply, three of the affected windows would experience alterations in excess of 40% in winter APSH but would experience reductions in APSH

between 30-40%. Of these two windows would retain total APSH levels in excess of 21% which is considered commensurate with the urban location of the Site. The other would experience a reduction from 19% APSH to 12% APSH. Three of the remaining affected windows would experience alterations in excess of 40% in winter APSH and would experience alterations between 20-30% in total APSH. These windows however would retain 3% winter APSH and in excess of 18% in total APSH which is considered good for west facing windows within an urban location. The final affected window would experience alterations in excess of 40% in winter APSH but would meet the BRE criteria for total APSH retaining in excess of the 25% recommended within the BRE Guidelines. This window retains a winter APSH of 2%.

5-8 Salisbury Court

- 470. This is a two storey residential property located to the north of the Biscuit Factory Site.
- 471. Of the 28 windows tested four would fail to meet the BRE criteria for VSC as a result of the proposed development. One would experience a minor reduction in VSC levels, two would experience a moderate reduction and one would experience a major adverse reduction in VSC levels.
- 472. The no-skyline test assessed the impact of the proposed development on 20 rooms. All of these would comply with BRE guidelines.

Sunlight

- 473. Eight out of the 16 windows (50%) tested would comply with the BRE guidelines for both WPSH and APSH. Of the eight that do not comply these would all experience reductions of over 40% in relation to WPSH while five would experience a reduction of 20-30% APSH and one would experience a reduction of 30-40% APSH.
- 474. Of those that do not, two windows would retain in excess of 25 % annual APSH, five of the windows will retain annual APSH values between 20 % and 24 % APSH, which is just below the target values. The remaining window, (W8/F01) would receive a noticeable loss of sunlight, however, this room is served by another window which meets the APSH target reductions and the room will receive APSH levels of 21 %.

16/17 Salisbury Court

- 475. This is a two storey residential property located to the north of the Biscuit Factory Site.
- 476. Of the 10 windows tested six would fail to meet the BRE criteria for VSC as a result of the proposed development. Three would experience a minor reduction in VSC levels, two would experience a moderate reduction and one would experience a major adverse reduction in VSC levels.
- 477. The no-skyline test assessed the impact of the proposed development on 6 rooms. All of these would comply with BRE guidelines.

Sunlight

- 478. Three out of the 7 windows (43%) tested would comply with the BRE guidelines for both WPSH and APSH. Of the 4 that do not comply these would all experience reductions of over 40% in relation to WPSH. However the retained APSH levels for this property would be between 32 % and 44 % APSH, in excess of the minimum target values as suggested by the guide for APSH.

88 Storks Road

Sunlight

479. Three out of the six windows (50%) tested would comply with the BRE guidelines for both WPSH and APSH. Of the three that do not comply these would all experience reductions of over 40% in relation to WPSH. However the retained APSH levels for this property would be between 32% and 44%APSH, in excess of the minimum target values as suggested by the guide for APSH.

86 Storks Road

Sunlight

480. Two out of the seven windows (43%) tested would comply with the BRE guidelines for both WPSH and APSH. Of the 3 that do not comply these would all experience reductions of over 40% in relation to WPSH. However the retained APSH levels for these windows would be between 26 % and 29 %APSH, in excess of the minimum target values as suggested by the guide for APSH.

92 Storks Road

Sunlight

481. Seven out of the nine windows (78%) tested would comply with the BRE guidelines for both WPSH and APSH. Of the two that would not comply these would all experience reductions of over 40% in relation to WPSH. However the retained APSH levels for these windows would be between 26% and 36%APSH, in excess of the minimum target values as suggested by the guide for APSH.

325 Southwark Park Road

Sunlight

482. Thirty two out of the 38 windows (84%) tested would comply with the BRE guidelines for both WPSH and APSH. Of the six that would not comply four would experience reductions of between 20-30% in relation to APSH and two would experience reductions of between 30-40% in relation to APSH. One of these windows would also experience a reduction of over 40% in relation to WPSH. The orientation of these windows close to due west means that they already receive low levels of sunlight, therefore any reductions below this appear high in terms of the percentage reductions. The windows affected would, except for one instance, receive above BRE minimum recommended levels for WPSH.
483. There are also a number of other properties which have one window which would not comply with the BRE guidelines in relation to both APSH and WPSH. Many of these marginally fall below BRE guidelines in relation to either APSH or WPSH. However the level of non-compliance is not considered to be of such significance that it should warrant the refusal of a high density development within an urban area.
484. There are other properties tested where some windows would experience minor or moderate reductions in VSC as a result of the proposed development. These would not be to the same scale as set out above and would impact the following properties:

Marden Square East
Marden Square South

325 Southwark Park Road
Layard Square East
92 Storks Road
6a Webster Road
69 Webster Road
23 Blue Anchor Lane
25 Blue Anchor Lane
35 Blue Anchor Lane
57 Webster Road
61 Webster Road
16-36 (even) Webster Road
13-31 (odd) Clements Road
4 Collett Road

485. All the other windows tested would comply with the relevant BRE guidelines.

Overshadowing

486. The assessment report states that seven out of the 98 private gardens and shared amenity spaces tested will not meet the BRE standard numerical guidelines, i.e. the area enjoying at least two hours of sunlight on 21 March will reduce to less than 50% of the area and less than 0.8 times its former value. These are:

- 101 St James's Road
- 13, 15 19 and 25 Clements Road
- 92 Storks Road
- 14-15 Salisbury Court

487. Of these, the effects on the Clements Road and Storks Road properties would be minor. The effects on 101 St James's Road and 14-15 Salisbury Court would be major (100% loss and 69% loss respectively).

Conclusions on Daylight and Sunlight

488. In conclusion in relation to daylight, sunlight and overshadowing impacts on existing properties surrounding the site, the results of the submitted analysis demonstrate that most of the residential properties tested would not experience any harmful change once the proposed development is built. Some properties would experience some harmful changes and the most significant of these are at Lockwood Square West, Marden Square West and 9-12 & 14-15 Salisbury Court. Reductions in daylight and sunlight will occur when new development of an urban scale takes place on sites which currently contain low rise buildings or areas of undeveloped land. The scale of the proposed development is generally greater than that in the immediately surrounding context, and this more intensive form of development has been supported by the Mayor in order to maximise housing delivery and optimise the use of scarce urban land. This optimisation of development must always be balanced against the impacts on the amenity of existing occupiers surrounding the site. The development has generally concentrated the tallest buildings away from the sensitive edges of the site, although there are buildings, for instance on Drummond Road, which are substantially larger than the existing context.

489. The number of properties experiencing loss of sunlight and daylight beyond the recommendations of the BRE, including those experiencing 'major' impacts, must be acknowledged as harm arising from the development. However, this must be read in the context of the BRE being an advisory, rather than a policy, document, and that its recommendations will often be difficult to achieve in an urban context. The BRE

advise that the guidance should be applied flexibly. On this basis, the impacts on existing occupiers must be weighed against the other impacts of the development, including the positive impacts of providing homes, jobs, new public space and a new school. Notwithstanding that the officer recommendation is that planning permission should be refused because in the overall balance the failures to accord with key policies outweigh the positive benefits, in the case of amenity impacts it is not recommended that these in themselves warrant the refusal of planning permission.

490. The daylight and sunlight information submitted in support of the application has been reviewed by an independent daylight and sunlight consultant, who are satisfied that it is a robust study. Therefore in light of the recommendations of the Mayor's Housing SPG that there needs to be appropriate degree of flexibility in the application of the guidelines to optimise housing capacity on large urban sites, the proposed harm to amenity is not of such significance as to warrant an additional reason for refusal

Temporary demolition/Construction Impacts

491. Concerns and comments have been received from neighbouring residents regarding demolition and construction impacts, including noise and disturbance, impact on air quality and construction traffic.
492. Chapter 5 of the ES specifically relates to the development programme, demolition and construction, and includes details of the sequence in which the individual plots would be constructed. The impacts of demolition and construction are also considered in the relevant chapters of the ES, i.e. demolition and construction impacts upon transport, upon air quality, upon noise and vibration and so on. It is noted that the phasing / sequencing could change, and if the application were to be approved it is recommended that a condition be attached requiring a phasing plan to be submitted for approval.
493. A draft construction management plan (CMP) has also been submitted with the application which sets out how it is intended that the demolition and construction process would be implemented and managed.
494. **Noise and vibration**
495. Chapter 10 of the ES assesses the likely impacts of the proposed development on noise and vibration. The assessment is based on detailed environmental noise measurements undertaken at the site and predictive modelling of the future noise and vibration levels, particularly relating to the intensified use of the railway viaduct to the south.
496. The ES has been reviewed by the Council's Environmental Protection Team (EPT) who has recommended conditions to ensure that appropriate internal noise levels (in dwellings) are not exceeded due to environmental noise. These conditions are intended to address the following:
497.
 - Where potentially significant noise-generating commercial and/or community uses are directly below residents, there is reasonable resistance to the transmission of sound;
 - The acoustic planning report identifies that the predicted levels of re-radiated noise and vibration from the railway viaduct may require building mitigation. Conditions would need to be attached requiring further assessment of the detailed design and mitigation for proposed residential buildings adjacent to the railway viaduct.
 - Hours of use and hours of servicing should be controlled by condition for all

commercial uses and the school MUGA.

498. Construction noise and vibration monitoring would be carried out in collaboration with the Council, with the levels to be agreed by the Council in advance. This would be secured through the Construction Environment Management Plan (CEMP) that would be secured through Section 106 Agreement, if the application were to be approved.

Transport

499. The proposed development provides the opportunity to make improvements to the existing pedestrian environment through the site and create new links with surrounding areas. In particular the proposed development would open up improved pedestrian routes from the site to Bermondsey Underground Station with a new pedestrianised route along a section of Keeton's Road and from the site through two railway arches to the area south of the railway and the Blue shopping centre. The proposed introduction of new retail, commercial and residential uses also increases the servicing requirements for the site. The proposed Low Line route would be enhanced as part of the proposal, however it would also be required to accommodate the significant increase in servicing vehicles required to service the proposed development and the businesses in the neighbouring Workspace buildings and Railway Arches. Council Transport and Highways officers have worked closely with the applicants and their transport consultants but concerns remain with the proposed routing of vehicles through the site and the detrimental impact this could have on pedestrian and cyclist safety.
500. Southwark's Core Strategy Policy 2 on Sustainable Transport seeks to encourage walking, cycling and the use of public transport rather than travel by car. This is intended to help create safe, attractive, vibrant and healthy places for people to live and work by reducing congestion, traffic and pollution. This policy requires the submission of a transport assessment to demonstrate that schemes minimise their impact, minimise car parking and maximise cycle parking. Saved Policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards.
501. The Biscuit Factory and Network Rail Arches are situated within an area with PTAL ranging from levels 2 to 5. Bermondsey Underground is situated 200m to the north of the site and London Bridge Rail Station is situated 2km to the west. All of the neighbouring roads are adopted highway under the control of Southwark Council. The nearest section of the Transport for London Road Network (TLRN) is the A200 Jamaica Road, located approximately 380m from the site's middle point. The nearest section of the Strategic Road Network (SRN) is the A200 Lower Road which is around 800m away. The nearest bus stop is on Southwark Park Road (Stanley Arms); however this is only served by one route (P12) which runs at a relatively low frequency. A further stop on Southwark Park Road (Anchor Street) is close to the southern part of the site, and this stop is served by two additional routes (1 and 381), both of which run 24 hours. Three additional routes can be accessed on Jamaica Road (47, 188 and C10), and an additional night bus route (N199).
502. The existing site contains a large car park, accessed from Drummond Road, which provides parking for employees and visitors of the existing employment buildings in the Masterplan Area as well as providing for some of the servicing space for existing buildings.
503. Chapter 8 in the submitted ES and the ES Addendum presents an assessment of the potential impacts of the proposed development on the local transport network. The

risks identified during the construction phase include a temporary, minor risk of delays to pedestrians and cyclists as well as a minor risk of transport users feeling fearful or intimidated by the volume of Heavy Goods Vehicles (HGVs) associated with construction activities. This can be mitigated through the CEMP that would be secured by the Section 106 Agreement were the application to be approved. Once construction is complete, the assessment concludes that potential impacts on the transport network are likely to be negligible in terms of delays to drivers, bus passengers and rail passengers. It is also noted that the proposed development would result in improvements to the pedestrian and cycle environments.

504. The proposed development includes introducing new pedestrian routes including re-instating a section of Keeton's Road between Collett Road and Webster Road, two new pedestrian tunnels through rail arches to link to the Blue and the introduction of the 'Low Line' extension along the north edge of the railway line. As well as these positive aspects of the proposal the proposed uses and increased density of development will present some challenging transport impacts, particularly for construction and servicing vehicle movements.

Servicing and Delivery

505. The proposed development would be serviced through a combination of off-street servicing and on-street servicing. Service yards are proposed on Plots BC-1234, Plot BF-D&E and in a basement servicing area under plot BF-RST. On-street servicing for residential uses is also proposed on Webster Road (1 space), Drummond Road (2 spaces by BC-1234, unmarked on-street servicing for Plot BF – W)), the proposed Low Line (1 space adjacent to Plot BF-D&E, 2 bays adjacent to Plot BF-RST), Clements Road (un-marked servicing for Plot BF-OPQ) and the proposed loop road around the existing Workspace buildings (1 bay for Plot – OPQ, 1 bay adjacent to West Yard, 2 bays to north of Plot BF – U&V). These servicing arrangements would also be required to provide capacity for the servicing of commercial units situated in the neighbouring railway arches and Workspace buildings.

Table 17 – Servicing Points

Plot	Servicing Points
BF – D&E	On-street Low-Line and Undercroft Loading Bays of BF – D&E
BF – F	Undercroft Loading Bays of BF – D&E
BF – OPQ	On-street from Clement's Road and Access Loop
BF – RST	On-street Low-Line and Access Loop
BF – W	On-street from Drummond Road for refuse, deliveries from the service yard
BC – 1234	Undercroft Loading Bays of BC -1234, and on street for Drummond Road (HGV refuse and deliveries)
BC – 5	On-street from Webster Road to south of plot
BC – 6	On- site and on-street from Keeton's Road

506. The applicants have assessed servicing requirements by basing their trip generation figures on two sites Imperial Wharf (2014 survey) and Bow Quarter (2016 survey). The forecast servicing and delivery trips for the proposed development are set out below:

Table 18 – Forecast Daily Deliveries by Use

BLOCK	FORECAST DAILY DELIVERIES			
	M/C	LGV	HGV	TOTAL
Residential	18	168	15	199
Retail	5	37	24	66

Office	12	54	31	97
Leisure	0	15	0	15
Compass School	0	5	1	6
Masterplan	35	279	71	385

507. The forecast daily servicing and delivery trips for each building is set out in table 19 below:

Table 19 – Forecast Daily Deliveries by Building

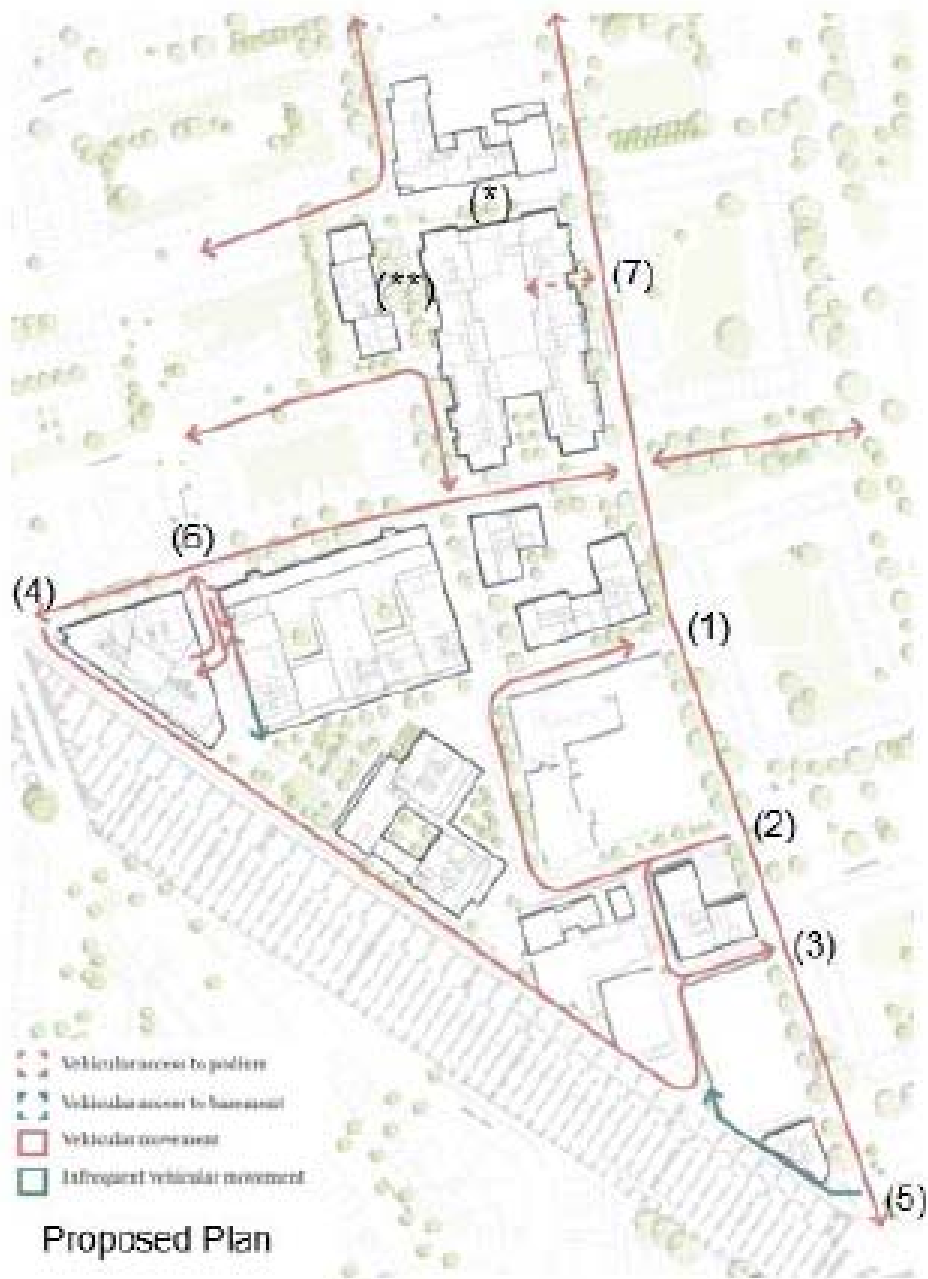
BLOCK	FORECAST DAILY DELIVERIES			
	M/C	LGV	HGV	TOTAL
Compass School	0	5	1	6
BC-1-4	4	42	7	53
BC-5	1	6	2	9
BF-DE	7	42	14	63
BF-F	11	69	30	110
BF-OQ	2	20	2	24
BF-P	1	7	1	9
BF-RST (commercial)	1	8	5	14
BF-RST (residential)	5	49	4	58
BF-U	1	9	2	12
BF-V	1	15	1	17
BF-W	1	7	2	10
Masterplan	35	279	71	385

508. The main servicing points throughout the site for the commercial uses are proposed as:

Low-line to service plots BF-D&E, BF-RST and the Workspace buildings within the south east of the site (Linking points 4 and 5 on image 16 below).

New access loop servicing route around the Workspace buildings accessed from Drummond Road

Image 16 – Proposed Masterplan Vehicle Access Points

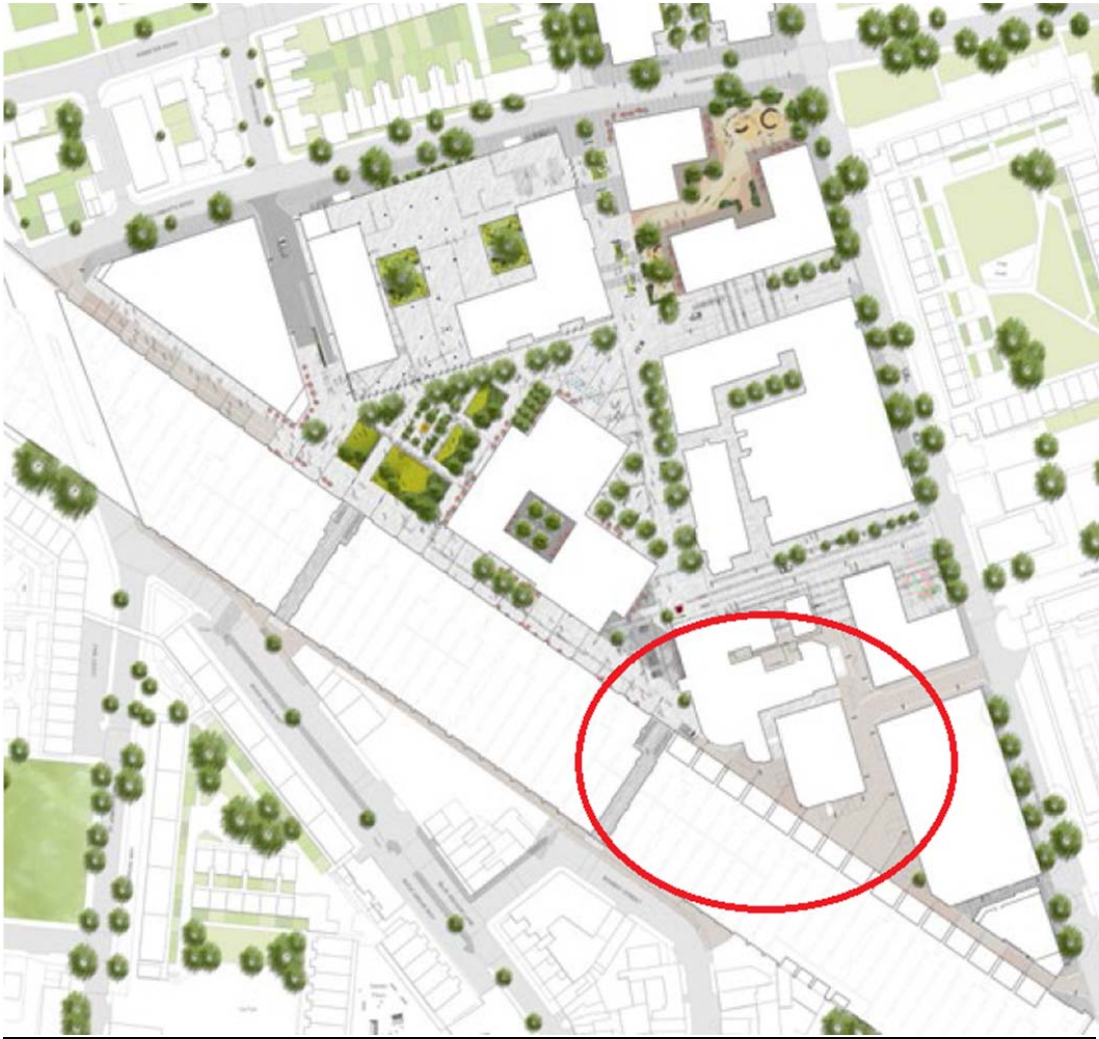


509. The above image shows the principle vehicle access/egress points to the site across the Masterplan Area as well as showing the proposed vehicle routes through the site. The principal routes through the site for vehicles are:

- The Low-Line accessed from north west via a left turn from Clement's Road close to the junction with St James Road (point 4 on image 16 above) and egress onto Drummond Road between existing Workspace buildings to south of plot V.
- The access 'Loop' around the Workspace buildings with access from (Point 2) and egress (Point 1) onto Drummond Road.
- Access and Egress to undercroft loading bays at Plot BF – D&E and basement car park/servicing under BF – RST.

510. A servicing route is also proposed with access from the south east corner of the site from Drummond Road to the south of Plot BF – W with egress from point 3 onto Drummond Road.
511. It is projected that the proposed servicing yard of Plot BF – D&E would receive 129 daily servicing trips, the access loop around the Workspace buildings would receive 11 daily servicing trips while the Low-Line would receive 58 daily servicing trips as a result of the proposed development.
512. However the proposed Low Line route and the access loop around the Workspace buildings would also be used to meet the existing and prospective servicing requirements of the Workspace buildings and the units within the Railway Arches. The TA states that the Workspace buildings would receive 112 daily servicing trips. Of these 5 are anticipated to use the Low Line route from Clement's Road, 47 would use the Access Loop and 60 would access and egress from access point 3 on Image 16 above. There are a number of railway arches that front onto the Low Line and have the potential for use as employment/commercial spaces. Of these 2 have been identified for use as potential pedestrian tunnels through the arches. These units would also have to be serviced via the Low Line. The lawful existing use of these arches is as industrial units. As set out earlier in the report, the Council were advised that the viaduct arches would be the subject of an application to be submitted concurrently with the Grosvenor's proposals. However to date this has yet to be submitted and therefore there is uncertainty with regards to how this could be delivered.
513. The trip generation projections for servicing vehicles, from the Transport Assessment, are set out in tables 18 and 19 above. These will represent an increase in the number of servicing vehicles accessing the site in comparison to existing arrangements. While delivery and servicing trips to the servicing yard of Plot BF– D&E and around the access loop are high these will be on a section of road dedicated specifically for vehicle movements. The Low Line would involve servicing vehicles sharing space with pedestrians and cyclists also using the route or crossing from the proposed tunnel routes linking with south of the viaduct.
514. Council Transport Planners have raised concerns throughout the pre-application and application process with regards to the servicing proposals for the Biscuit Factory part of the application site. The applicants have sought to address these, however highway safety concerns remain for pedestrians and cyclists through the south eastern part of the site and for the section of the Low Line along where there will be a significant number of servicing trips. The key points of concern are:
- Failure to provide a pedestrian route from the access loop flanking the eastern end of BF-RST to 'Shard Walk' and to the pedestrian route through to the arch at the immediate southern side of Building BF-U
 - The west/east routing of servicing vehicles along 'Shard Walk' beyond the pinch point at the south eastern end of this site south of BF-V. This would not permit safe east/west movements of pedestrians and cyclists.
 - The retention of the existing internal road abutting the eastern boundary of Building BF-V and connecting Drummond Road to Shard Walk at the south eastern periphery of the site would create blind spots for pedestrians, cyclists and vehicles and would exacerbate vehicle-pedestrian/cyclist conflict and would hinder proper distribution of vehicular traffic around this site.
515. These concerns are concentrated in the area identified in image 17 below:

Image 17– Area of Highway Safety Concern



516. The proposed intensification of the use of this area by vehicles, pedestrians and cyclists in conjunction with the narrow road width, shared road space and restricted visibility for all users would create conditions which would be harmful to pedestrian and cyclist safety contrary to planning policies SP2 of Southwark's Core Strategy 2012 and would fail to create a development with safe and secure walking and cycling routes contrary to Saved Southwark Plan Policy 5.3 'Walking and Cycling'.

Image 18 – Two specific areas of Highway Concern



517. The areas are identified in more detail in image 17 above. Area 1 highlights the pinch point between Workspace building BF-C with the entrance to the pedestrian tunnel just to the east. At its narrowest point there is a width of 3.2m from the viaduct to building BF-C. This would be directly next to the railway arch unit which is outside of the site and the control of the applicants.
518. Area 2 covers the space in between the existing workspace buildings. Vehicles accessing this part of the site would be able to do so from the four different routes: the Low Line from Clements Road; the Low Line from Drummond Road; the one-way route from the 'Access Loop' between Plots BF-V and BF-U and the two-way junction to the south of Building BF-V.
519. This space will also be accessible to pedestrians and cyclists moving around the site and using the Low Line. Given the intensification of the use by servicing vehicles, the positions of the proposed loading bays, the sharp turns within the service yard resulting in limited visibility along the routes and the failure to provide a separate pedestrian pavement, the development would result in road conditions that would bring different modes of transport into conflict with each other. This would detrimental

to Highway and pedestrian safety' contrary to Strategic Policy 2 – Sustainable Transport which seeks to encourage walking, cycling and reduce the dependence on travel by car to help create safe, attractive, vibrant and healthy places for people to live and work. The proposed design and layout would give priority to private servicing vehicles over walking and cycling contrary to Strategic Policy 2. The lack of direct vehicular and pedestrian route linkage from the proposed access loop flanking the eastern boundary of Building BF-RS & T to 'Shard Walk, would hinder proper distribution of vehicular traffic around this site and the preservation of the area identified as potentially having infrequent vehicular activities around Building BF-W for pedestrians/cyclists.

Car Parking

520. The development provides a limited amount of on-site parking and wheelchair accessible parking. The site is situated within a CPZ with good levels of public transport accessibility and therefore is in an appropriate location for a low car parking development. Nevertheless concerns have been raised by local residents that the proposed development would result in a detrimental impact on existing on-street parking conditions outside the hours of control for the CPZ. The proposed development would result in the loss of the existing car park on Drummond Road which serves employees and customers using the businesses and leisure services currently provided on the Biscuit Factory site.
521. The proposed development would provide 89 car parking spaces comprising 65 spaces for residential including 14 disabled bays, 20 spaces for employees within the Workspace buildings including 1 disabled bay and 4 car club bays. Of these 15 would be active electric vehicle charging spaces while a further 15 are identified as passive electric vehicle charging points, which could become activated should demand arise in the future. This is inline with TFL requirements
522. 15 x wheelchair accessible parking spaces will be provided across the Biscuit Factory site. These are situated in the following locations:
- 4 within the podium car park of plot BC-1234
 - 3 in the basement car park under plot BF-RST
 - 3 are situated in the public realm off the Low Line;
 - 4 are situated in the public realm on the Workspace Access Loop;
 - 1 is situated in the public realm adjacent to Plot BF-V.
523. All spaces have been sized to meet the access requirements set out in Building Regulations, 26% (4 spaces) of these spaces will be active electric vehicle charging.
524. This level of parking provision equates to approximately 11% of the total number of wheelchair user dwellings, although the spaces within the public realm can not be reserved solely for residents use and will also be available to employees and visitors to the site. Nevertheless this is considered acceptable having regard to the London Plan and Southwark Core Strategy, which both advise that *adequate* parking for disabled persons should be provided. Emerging New Southwark Plan policy P53 stipulates a maximum provision of 1 accessible parking space per unit with consideration given to anticipated demand given the tenure of housing; the quality and accessibility of local public transport and car ownership levels. Officers consider that these factors support a lower level of accessible parking provision at this site.
525. All prospective residents and commercial occupiers would be prevented from obtaining on-street parking permits in order to avoid parking stress. If the application were to be approved then this would need to be secured through appropriately

worded conditions/section 106 obligations.

Cycling

526. The council's Core Strategy underlines a commitment to sustainable travel and London Plan Policy 6.9 establishes minimum cycle parking standards for various use classes. The proposal includes a substantial investment in cycling infrastructure within the buildings and the public realm amounting to 2043 long-stay and 144 short-stay cycle parking spaces.
527. The cycle parking provision for residential properties would significantly exceed the minimum cycle storage provision of 1839 spaces. These would be provided on each plot and would be principally located at the ground or mezzanine levels. Cycle parking provision is generally required at the ground floor level where it is more accessible for residents. However it is recognised that this can result in large areas of blank frontage at ground level and therefore where there is a desire to provide active frontages and uses at the ground floor level, this will require the provision of cycle storage above and below ground level to ensure density is optimised. The proposed cycle storage should also include a mix of both Sheffield Stands and Stackers. Further details of this would be sought by condition in the event that permission was granted.
528. Cycle parking provision above existing standards is also proposed for the non-residential uses. This would be provided within both buildings BF-F and BF-DE for the office workers. Commercial cyclist facilities are to be provided in two central locations across the development. One on the Bermondsey Campus and one on the Biscuit Factory. The facilities will be able to be used by people working in any of the commercial units. Each will have secure internal cycle storage and also shower facilities.

Waste Management

529. A stand alone waste management strategy has been submitted by the applicants. This was prepared by WSP who also prepared the Transport Assessment. The assumptions regarding the frequency of collections is that Southwark Council would collect residential waste once a week for each waste stream and that commercial waste will be collected daily for each waste stream by a private contractor.
530. The waste storage provision requirement for a development is based on the number of bedrooms proposed and is set out below:
- Total weekly refuse (litres) = 30 litres per unit + 70 litres per bedroom
 - Recycling provision (litres) = Total weekly refuse x 0.5
 - Refuse provision (litres) = Total weekly refuse x 0.75
531. The volume of waste storage required has been calculated for each building across the Masterplan site. This includes an assumption regarding space required for food waste given that this is likely to be a requirement in the future (12 litres per household per week). This is set out in the tables below:

532. Table 20– Waste Storage provision

Plot	Units	Beds	Refuse (Litres)	Recycling (Litres)	Food Waste
BF – D&E	131	245	15,810	10,540	1,572
BF – F	177	279	18,630	12,420	2,124
BF – OPQ	174	300	19,665	13,110	2,088
BF – RST	390	558	38,070	25,380	4,680

BF – W	45	88	5,633	3,755	540
BC – 1234	263	476	30,908	20,605	3,156
BC – 5	37	62	4,088	2,725	444

533. Each plot would have its specific waste strategy. Each residential unit would be fitted with waste segregation units of the relevant size within the kitchen. All the plots with taller elements would have waste chutes which are designed to be within 30m of every flat front door. The waste chute would be fitted with a tri-separator system which will allow refuse, mixed recyclables and food waste to be collected separately.
534. One of the benefits of the PRS model is that the applicants are able to commit to providing an on-site Facilities Management team who will be responsible for regularly monitoring them and for exchanging full to capacity and empty bins as required.
535. Building D&E would have a sufficient waste storage space adjacent to the loading bay to service Plot BF-D&E and Plot BF-F. The residential element of Plot BF-F will have chutes servicing the residents units on the upper floors of the southern side of the building. The proposed residential units situated within the existing building on the northern part of the building on level 1 would have interim storage arrangements on the first floor. The FM team will be involved in managing this space to ensure that there is suitable waste/recycling storage on this floor. The residential waste for building BF-F will be moved by the management team from building BF-F to the storage area on BF-D&E where they will be collected by the waste collector.
536. Building BF-OQ will have a chute serving core Q which will discharge at ground floor level. Core O would have residents manually transporting waste to the BF-O waste store at the ground floor level. It is not possible for bins to be collected from the store directly therefore the on-site FM team will be responsible for monitoring this area and transporting bins to the bin storage area at BF-O. The Council's Waste Collector will be able to use the on-street loading bay situated on the loop road to the south of the site for collection.
537. Building BF-P has a main waste store situated on the groundfloor adjacent to Clement's Road. Residents would be required to manually transport waste to the ground floor level via lifts. The bin store is appropriately sized to service the waste requirements for this location.
538. Plot BF-RST would have a waste chute hopper serving each core and situated on each floor. The main waste storage area would be at the basement level and would be monitored by the FM team.

Construction Management

539. Chapter 5 of the ES specifically relates to the development programme, demolition and construction, and includes details of the sequence in which the individual plots would be constructed across the site. The impacts of demolition and construction are also considered in the relevant chapters of the ES, i.e. demolition and construction impacts upon transport, upon air quality, upon noise and vibration and so on. A construction management plan (CMP) has also been submitted with the application which sets out how it is intended that the demolition and construction process would be implemented and managed; it is based on a standard pro-forma which has been produced by the Council to assist people in formulating CMPs. If the application was to be approved this would be secured through the legal agreement.

Cycle Hire

540. The scheme would deliver an additional 2 cycle hire docking stations. Broad locations have been identified as appropriate by the applicant adjacent to Clement's Road north of the proposed play area and adjacent to the pocket on Plot BF-V near Drummond Road and the Workspace buildings. However the precise location and timing of delivery would have to be set out in an appropriately worded clause within a s106 agreement.

Travel Plan

541. A draft Travel Plan Framework has been prepared and sets out a range of measures that will encourage future residents, employees and visitors to the site to make use of sustainable travel choices. The plan follows TfL guidance, establishing clear objectives, interventions and a monitoring framework to consider whether more sustainable travel has been achieved.
542. The Travel Plan includes a range of action targets for the proposed development. This includes:
- the appointment of a Sustainable Travel Manager to take responsibility for the development and management of the plan supported by Travel Plan co-ordinators for each occupant to act as a focal point for contact and to monitor and evaluate the success of these interventions over time;
 - The provision of cycle parking above existing standards prior to the occupation of the development;
 - The production of a travel pack to promote alternative modes of transport and the key services to be provided through the Travel Plan;
 - Travel behaviour surveys to be undertaken in years one, three and five after the initial Travel Survey (year 0) has been undertaken.
543. The approach to travel planning is acceptable and officers are content that the scheme comprises a range of interventions that will facilitate more sustainable travel to and from the site.

Highways works

544. The development requires a range of highways works to both reflect the quality of the new architecture and public realm and to mitigate the impacts of a development of this scale. The scope and phasing of the permanent highways works would be required to be outlined in the s106 agreement were the application to be approved, and their delivery ultimately secured through s278 Agreements with the council, where appropriate. These works are anticipated to include:
- Improvements to the junction of Clements Road and the western access to the Low Line to improve visibility and the ease of manoeuvre for drivers. This needs to be designed to ensure that the layout conforms to SSDM and DMRB standards.
 - The provision of a cycle contra-flow along the proposed Low Line route;
 - Improvements to the junction of Drummond Road and the south-eastern end of the same service road Low Line to improve visibility for drivers.
 - Details of a scheme for slowing vehicle speeds along the Low Line.
 - Dedication of 1m wide sliver of land on Drummond Road as highway
 - Diversion of footway for the proposed loading bays next to BC-5 on Webster Road;
 - Re-paving of footway segments abutting the site on Collett Road, Webster Road, Clement's Road, Keeton's Road and Drummond Road
 - Creation of two extended raised tables at the junctions of Clement's Road with Keeton's Road and Drummond Road.

- Construction of raised pedestrian crossing on Clement's Road and Drummond Road.
 - Removal of redundant crossovers
 - Improvement to the pedestrian route via Blue Anchor Lane and Bombay Street.
545. In addition to these permanent works, a series of temporary highways works would be required during demolition/construction to adequately mitigate the impacts of these processes. It is anticipated that such measures would be clearly identified in the relevant demolition/construction environmental management plans, which would need to be prepared for each Phase.

Transport conclusions

546. The proposed development would significantly improve pedestrian and cyclist permeability in the area with the introduction of improved pedestrianised links south under the viaduct and north along Keeton's Road towards Jamaica Road and Bermondsey Underground Station. However, it is noted that the applicant cannot guarantee the delivery of the routes beneath the viaduct since they have no formal agreement with the owners. In addition to this the proposed development would facilitate the enhancement of the Low Line Route along the north section of the viaduct. The proposed development would also reduce car dependency with a significant reduction in parking provision on site. However there would be a significant increase in servicing movements across the site with a heavy reliance on the Low Line route to provide for the servicing needs of units within the Biscuit Factory Site, the Railway Arches and Workspace buildings. The intensive use of this route in conjunction with the parking and servicing arrangements of the Workspace servicing yard and the failure to provide a separate pedestrian and cycling route creates two areas with limited visibility for vehicle drivers, pedestrians and cyclists which would create unsafe environment for pedestrians and cyclists contrary to Policy 5.2 and 5.3 of the Saved Southwark Plan 2007, Strategic Policy 2 of the Core Strategy 2011 and Emerging Policies P11, P47 and P48 of the Submission New Southwark Plan.

Equality implications

547. The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender reassignment, pregnancy and maternity, race, religion, or beliefs and sex and sexual orientation. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
548. This section of the report examines the impact of the proposal on those with protected characteristics and with a particular focus on the Council's legal duties under s.149 of the Equality Act 2010. The applicants have prepared an Equalities Statement (EqS) which identifies the impacts of the proposed development on persons who share relevant protected characteristics as defined by the Equality Act 2010.

549. The EqS states that not all effects of development are equality issues but that they may become equality issues when any adverse effect on those with protected characteristics is disproportionate or differential.
550. A disproportionate effect is defined as where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population. A differential effect is where people with a protected characteristic are affected differently to the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic. The scale and significance of such impacts cannot always be quantified, and it is common for analysis to address this through descriptive analysis of impacts, and identifying whether such impacts are adverse or beneficial.
551. It is noted in consultation comments below that some objections have been received in relation to the impact of the proposed development on the existing uses within the site. The applicants have submitted an Equalities Statement and Addendum to assist the Council in discharging the Public Sector Equality Duty. These provide information on existing businesses and community groups which currently use the site and would have their activities disrupted or relocated as a result of the proposed development. They also seek to identify which protected characteristics may be affected by the proposed development.

Existing Businesses/Community Groups

552. The applicants currently manage a number of existing buildings across the site. These include a range of business occupants ranging from architects, leisure businesses, affordable workspace providers, storage and distribution and café/bar, which have entered into leases/licenses under interim arrangements. In addition to this there are a number of community groups who also make use of the existing facilities on site. The EqIA identifies all the existing tenants on site and provides details of the nature of the use, whether there would be any protected characteristics associated with the use/users and details of the relocation timing/strategy.
553. Of those businesses and community groups affected those which serve a group with a protected characteristic are identified. These have predominantly entered into leasing agreements which the applicant refers to as short term but favourable due to the recognition that they are for a limited period prior to demolition and redevelopment. The provision of community space and employment space within the proposed development would present opportunities for businesses and community groups to occupy or use space within the new development. The applicant has confirmed that some discussions have taken place with existing occupants in relation to space within the new development.
554. The applicants have also sought to consider what the impacts of the proposed development would be on protected characteristics identified including Age, Race, Pregnancy and Maternity, Religion and Disability. No effects have been identified in relation to Sex, Sexual Orientation, Marriage and civil partnership and Gender reassignment.
555. In relation to Age these are all considered to be positive as a result of the provision of the replacement school, improved accessibility and mobility for older people as a result of public realm improvements, provision of over 2000sqm of new child play space and a range of employment opportunities for all age groups.
556. In relation to disability the new housing will be significantly more accessible than the existing average housing stock and will increase the number of wheelchair units.

There would be a neutral impact on disability during construction as existing accessibility provision would need to be maintained during demolition and construction

557. In terms of Pregnancy and Maternity a positive effect is identified for the completed development as the inclusive and accessible design principles applied to the public realm would improve access for pregnant women and parents with pushchairs. The improved areas of public realm would also provide/play areas for young children and their carers.
558. There would be an effect on Race and Religion or belief as the existing resident population in the area is highly diverse. However the changes to business and housing mix are not considered to impact differentially or disproportionately on any particular race or those with a Religion or Belief and therefore the impact is set as neutral within the EqIA.

Overall Assessment of Equality Implications

559. The proposed development would undoubtedly result in a significant change to the site. The public sector equality duty does not prevent change, but it is important that the Council consider the acceptability of the change with a careful eye on the equality implications of that change given its duty under s.149 of the Equality Act 2010. The Council's duty is to have due regard to the objectives identified above when making its decision. In the present context, this means focussing carefully on how the proposed change would affect those with protected characteristics, and ensuring that their interests are protected and equality objectives promoted as far as possible.
560. There would be businesses and community groups displaced from the site however these businesses and community groups have all entered into short term leases with the Applicants based on favourable terms in the knowledge that redevelopment would occur requiring vacant possession of the premises. There would be some opportunity for these businesses/community organisations to enter into new agreements with the Applicants post-development to occupy space in the new development. In addition to the specific businesses and groups affected the proposed development would provide a wider range benefits including public realm improvements, play space provision, increase in employment opportunities, new and replacement community facilities and increased housing which would have a positive equalities impact.

Air quality

561. The site lies within an Air Quality Management Area. This means the air quality is poor, with high levels of pollutants including particulate matter (PM10) and nitrogen dioxide (NO₂). Southwark Plan Policy 3.6, Air Quality, states that planning permission will not be granted for development that would "lead to a reduction in air quality." London Plan (2016) Policy 7.14 states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality.
562. The submitted ES – chapter 9 cover air quality, which has been reviewed by the Council's EPT officer. The report notes that there is potential that emissions of dust arising from the Site during demolition and construction, could result in a loss of amenity at nearby existing resident properties and the proposed residential accommodation to be completed in earlier phases. Appropriate mitigation could be secured through the Construction Management Plan and the Construction Method Statements to the extent that the worse case scenario would be a temporary slight adverse impact for local receptors. There is also a slight temporary adverse impact

predicted from construction vehicles entering and leaving the site. At its peak the maximum number of vehicles generated during construction has been estimated as 281 vehicle movements.

563. Air quality impacts once the proposed development has been completed would arise due to emissions from road traffic movements associated with the Proposed Development. The assessment has shown that the effect of traffic emissions would not result in a significant increase in pollutant concentrations at existing off-site receptor locations. It concludes that the completed Proposed Development would not give rise to a significant effect on air quality at either off-site existing receptors or at future on-site receptors. The Council's EPT officer has recommended conditions in relation to air quality should the application be approved.

Ground conditions and contamination

564. Policy 5.21 of the London Plan advises that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.
565. A Ground Conditions Risk Assessment has been undertaken and appended to the ES. This finds historical contaminative uses and known contamination, including from asbestos, lead and other contaminants. There is also potential for other contaminants to be found. The Council's EPT officer has commented that this is not considered to be unusual for urban former-industrial sites and would not present a bar to development as long as appropriate remediation is put in place. They have also requested that should the application be approved further detailed assessments would be required along with ground gas assessment following vacant possession. These could be secured by condition along with the requirement for a remediation strategy, remediation works and verification.

Water resources and flood risk

566. Policy 5.13 of the London Plan advises that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Strategic policy 13 of the Core Strategy sets a target that major development should reduce surface water run-off by more than 50%.
567. A Flood Risk Assessment has been submitted with the application. The site is situated within a Flood Zone 3. The proposed uses for the site have a flood vulnerability classification of 'More Vulnerable'. Given that the site is located in Flood Zone 3, an exception test is therefore required to ensure the development is safe for its lifetime following the completion of a sequential test.
568. The development would meet the Exception Test and is considered to be appropriate in line with NPPF guidelines. Appropriate mitigation measures are proposed and both a Flood Management Plan and Flood Response Procedure would be prepared and implemented. A dedicated surface water drainage network would be provided within the Site, connecting to building drainage systems and hard landscaped surfaces within the public realm. Surface water flows to off-site networks will be restricted in line with planning guidance, with Sustainable Urban Drainage System (SUDS) features providing attenuation capacity.

Sustainable development implications and energy

569. 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. Of note is that residential buildings must now be carbon zero, and non-domestic buildings must comply with the Building Regulations in terms of their carbon dioxide emissions. An Energy statement and Sustainability Assessment based on the Mayor's hierarchy have been submitted. Concerns raised in the GLA's Stage 1 report were addressed during the course of the application.

Be Lean (use less energy)

570. A range of passive and active energy efficiency measures are to be employed within the development including:
- Enhanced thermal envelope performance reducing heating and cooling demands for the building
 - Glazed areas of façade incorporating high efficiency glazing with the window to wall ratio limited to 40:60.
 - Improved envelope air tightness leading to savings in the heating and cooling energy consumption.
 - Centralised and energy efficient gas fired boilers;
 - Mechanical ventilation with heat recovery; and
 - Low energy lighting (LED lighting throughout).
 - Mixed mode ventilation strategy for the school. With passive and mechanical ventilation with heat recovery
 - Cooling strategy seeks to minimise internal heat generation though energy efficient design, natural light and energy efficient lighting.
 - The acoustic constraints of the railway mean that 21% of the residential units would require active cooling to reduce the impact of overheating.

571. The requirement for active cooling in 21% of the units has meant that the proposal would not improve on building regulations for energy efficiency after the incorporation of 'Be Lean' passive and active energy efficiency for domestic properties. The non-domestic CO₂ emissions after the incorporation of 'Be Lean' measures would be approximately 6% lower than a Part L2A compliant development. In total there would be 0% savings against the baseline scheme as a result of energy efficiency measures.

Be Clean (supply energy efficiently)

572. The London Plan policy 5.5 states *The Mayor expects 25 per cent of the heat and power used in London to be generated through the use of localised decentralised energy systems*. Policy 5.6 of the London Plan states that development proposals should evaluate the feasibility of Combined Heat and Power (CHP) Systems in relation to the energy hierarchy:

1. Connection to existing heating or cooling networks;
2. Site wide CHP network;
3. Communal heating and cooling.

573. The site is situated close to the South East London Combined Heat and Power plant (SELCHP) which is an existing heat network supplied by heat from an 'Energy from Waste' facility. The applicant's priority for the energy strategy is to enable and prioritise a connection to the SELCHP Heat Network (subject to agreeing reasonable connection terms). The applicant has confirmed that negotiations with SELCHP have

been ongoing for some years and a copy of a signed Memorandum of Understanding between the applicants and Veolia has been provided.

574. The applicants would be installing a site heat network and have confirmed that all buildings will be connected to the heat network. Heat would then be supplied by SELCHP. Using carbon factor data provided by Veolia the proposed development would achieve a total regulated carbon emission reduction of 39% on the Part L1/L2 Building Regulations with the non-residential elements of the scheme achieving a 9% reduction and the residential a 55% reduction over Part L1A 20123 Regulations.
575. The intended heat strategy is to facilitate a connection to SELCHP that will provide guaranteed heat to the domestic buildings and the school. Heating and cooling for the office space will be provided by a Variable Refrigerant Flow (VRF) system. The retail space will be provided as shell only however the design intent is that heating and cooling will be provided by separate VRF systems. Should the application be approved these measures would be secured through appropriately worded clauses in the legal agreement.
576. 'Be Clean' measures would provide a further 57% reduction in domestic CO₂ emissions, amounting to 54% along with 'Be Lean' measures. The non-domestic emissions would be reduced by a further 1%, amounting to around 4% along with 'Be Lean' measures.

Be Green (low or carbon zero energy)

577. A number of renewable technologies were assessed in terms of their technical, physical and financial feasibility. The assessment found that 350sqm of solar panels could be provided on roofs across the proposed Masterplan site. Other technologies relating to heat pumps have not been considered, as these would not be permitted as part of any connection agreement with SELCHP to supply heat to the proposed development. Therefore the proposed carbon savings associated with low or zero carbon energy are only those associated with the provision of 350sqm of photovoltaic panels. This would lead to no further reduction of domestic carbon and an additional 1% regulated CO₂ saving from the non-domestic carbon.
578. A combination of the above measures would deliver a 39% reduction in co₂ emissions across the entire development. A 35% reduction is required for the commercial space (9% would be achieved), and carbon zero is required for the residential units (a 55% reduction would be achieved). The proposal would therefore fall short of the policy requirement. A contribution of £1,014,000 towards the Council's carbon off-set fund would therefore be required, and secured through a section 106 agreement, were the application to be approved, together with clauses to secure the on-site measures.

BREEAM

579. Strategic Policy 13 of the Core Strategy requires commercial units to achieve BREEAM "excellent" and community facilities to achieve "very good". A BREEAM Pre-assessment report has been undertaken which demonstrated that a minimum 'very good' rating is proposed for all units to be delivered as 'shell only', such as the retail and leisure units and the school. The new office buildings would seek to achieve a BREEAM 'Excellent' rating. A BREEAM 'very good' rating is proposed for the office floorspace within retained building BF-F. The commercial spaces would not achieve "excellent" because the applicant assessed it on the basis that only the shell would be delivered. If the application were to be approved a planning condition would be recommended to secure an independently verified BREAAM report demonstrating that the relevant rating would be achieved prior to the fit out of any of the commercial

premises.

Archaeology

580. The Environmental Statement notes that during demolition and construction the proposed development would have a moderate to major adverse effect on archaeology in the absence of appropriate mitigation. The assessment determines, as far as is reasonably possible, the location, extent, date, character, condition, significance and quality of any surviving archaeological remains liable to be threatened by the proposed redevelopment. This work helps to determine whether this development is likely to cause harm to the built and buried historic environment and, if so, what measures need to be in place to manage this. The details submitted are in accordance with best practice as set out in the NPPF and the Council's Saved Policy 3.19. As the proposal is for extensive redevelopment, archaeological deposits across the site are likely to be varied and a phased approach to archaeological interest is required here. There is, however, sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission - provided conditions relating to archaeological building recording, archaeological evaluation, mitigation and reporting are attached to any approval. In addition to this details of foundations would also be required ahead of works commencing on each of the relevant phases.

Wind microclimate

581. Chapter 12 of the ES assesses the likely impacts of the proposed development on wind and microclimate in terms of pedestrian safety and comfort using a computer model. It concludes that some of the new buildings would affect the speed and direction of wind flows and could result in pedestrian discomfort on Clements Road, within the site and within the amenity roof terraces of the proposed development. Mitigation is required to ensure that these areas would have appropriate levels of comfort.
582. A landscaping scheme has been designed and tested using a wind tunnel to improve the site conditions. The mitigation measures have been integrated into the planning drawings and design guidelines. The majority of the mitigation includes moving trees and hedges and including canopies, dividers, and balustrades on and around the buildings. These should be secured by a suitably worded planning condition.
583. With the inclusion of the mitigation measures, the results of the completed development range from being suitable for sitting to strolling during the windiest season. During the summer months the results show the site would be suitable from sitting to standing levels of pedestrian comfort. The significance of the mitigation changes the impact of the completed development to having a negligible or minor beneficial impact at the sensitive areas.
584. The submitted ES states that assessment of the proposed development in a cumulative scenario, including other committed developments in the surrounding area, demonstrates that there would be no additional wind issues.

Health impact assessment

585. The applicants have submitted a Health Impact Assessment. This identifies both the direct impacts of the development on health and the indirect effects mediated through the determinants of health, such as employment, housing conditions, community cohesion and social support and access and amenities. The HIA then identifies interventions that can minimise any negative impacts, and potentially enhances any

positive ones.

586. Policy 3.2 of the London Plan states that the impacts of major development proposals on the health and wellbeing of communities should be considered through the use of Health Impact Assessments (HIA). It also states that new developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.
587. The HIA submitted considers the people potentially affected by the proposed development to be:
- The existing workforce, residents and pupils within the Bermondsey Project Core Area;
 - New workforce, residents and pupils associated with the Proposed Development within the operational phase;
 - Construction phase employees; and
 - Visitors to the Proposed Development.
588. With specific consideration being given to potential impacts on vulnerable people within these population groups, where appropriate.
589. The HIA concludes that the proposed development would benefit the above groups providing both physical and psychological benefits and that there would also be benefit to some of the most vulnerable groups. The key benefits associated with the proposed development include:
- the provision of new housing including 10% wheelchair housing,
 - long term minor beneficial effect as a result of new employment opportunities,
 - the provision of a replacement school with purpose built accommodation would bring benefits to students, school employees and the local community
 - The provision of high quality public realm and new accessible pedestrian routes with the continued promotion of an active travel agenda would promote a minor health benefit for employees and new residents over the long term.
590. During demolition and construction there is the potential for short term negative impacts on health and well being. The applicants have stated that the effects of these can be mitigated through good communication with the local community and other affected stakeholders. This would need to be integrated within the Construction Management Plan along with the requirement for appointed contractors to sign up to the Considerate Constructor Scheme. In terms of the negative aspects of the proposals Public Health Officers have noted that the lack of truly affordable housing impacts on all aspects of life and therefore not all of the benefits associated with the proposed development will be realised for some of the most vulnerable receptors. However overall the health impacts of the proposed development are considered to be acceptable.

Ecology

591. The site is predominantly covered by existing buildings and hard landscaping. The existing buildings and site are considered to have negligible ecological value whereas the proposed development provides good opportunities for ecological enhancements and green infrastructure. As part of the ES, a detailed assessment of the effect of the proposed development on ecology and biodiversity has been undertaken.
592. Policy 7.19 of the London Plan 'Biodiversity and access to nature' requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity wherever possible. Saved

policy 3.28 of the Southwark Plan states that the Local Planning Authority will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, and will require an ecological assessment where relevant.

593. The ecological statement recommends the provision of the following appropriate ecological enhancements to ensure that the proposed development makes a positive contribution towards the enhancement and create of biodiversity:

- Provision of bat boxes and a lighting strategy in conjunction with a relevant qualified ecologist.
- Mechanisms for securing protection of birds during construction in CMP
- Landscape planting and biodiverse roofs with appropriate species incorporated into landscape
- The provision of a minimum of 20 nest boxes or features and the provision of insect homes to complement green roofs and other landscape features.
- The provision of native trees and hedgerows to support the provision of wildlife corridors.

594. These measures would have to be secured through appropriately worded conditions and section 106 obligations.

595. With these measures in place the proposed development would make a significant positive contribution towards the enhancement, creation and management of biodiversity in the local area.

Socio-economic impacts

596. Chapter 6 in the ES presents an assessment of the potential socio economic effects of the proposed development. The chapter concludes that overall, the residual socio-economic effects of the proposed development are deemed to be temporary minor adverse to major beneficial during the demolition and construction stage and following completion of the development.

Demolition and construction

597. This ES notes that there are a number of businesses and a school located on the existing site. The businesses all have temporary tenancy agreements with the applicant and currently support up to 270 jobs. The school provides places for up to 600 secondary pupils but will be re-provided as part of the application. The proposed replacement school would be constructed during the first phase of the development and the existing school would remain operational throughout development works allowing for the continued service provision. As service is continued throughout there will be no loss of employment associated with the school and disruption to the school would be minimised. A range of measures would have to be secured within the CMP to ensure that students are not significantly affected during the ongoing demolition and construction works across the site. There would be a temporary loss of employment which would have a temporary minor adverse effect at site level.

598. The ES states that “construction works are expected to create an average workforce of 600 workers throughout the construction period of eight years, with an anticipated peak of 1200 workers on site. The likely effects of the construction employment would be negligible albeit the additional spending by construction employees working on site would have a temporary minor beneficial effect at the local level.

Completed Development

599. The completed development would positively contribute towards meeting local and regional housing targets and could create between 935 and 1,260 gross new jobs, depending on the exact nature of the commercial uses which would ultimately come forward; this would be an increase of between 685 and 1020 and again, measures to secure jobs for unemployed borough residents through the s106 agreement are recommended. The ES also acknowledges that the new population would result in further demand for health provision, but a substantial amount of CIL would be payable which could be used to deliver additional facilities if existing or planned GP practices have insufficient capacity.
600. In relation to play space and open space the ES advises that the proposed development would provide over 2155sqm of playspace across the site and would result in a significant increase in areas of public realm against the current baseline condition which has no amenity space. The ES concludes that there would be a minor beneficial impact at the site level.
601. The ES advises that the proposed development could generate an estimated £18.8m per annum in additional retail spending associated with the proposed new residential accommodation while the additional spend associated with the net increase in employment on site would equate to between £1.1m to £3.0m. It is expected that a significant proportion of this would be captured locally (further discussion of the retail impact is set out in paragraphs 97 to 121 above).

Conclusion to socio-economic impacts

602. It is concluded that subject to s106 obligations being met the proposal would comply with the development plan in relation to socio-economic impacts.

Planning obligations (S.106 undertaking or agreement)

603. Saved policy 2.5 'Planning Obligations' of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Core Strategy 14 and Saved Policy 2.5 of the Southwark Plan state that planning obligations will be sought to reduce or mitigate the impacts of the development. These local policies are reinforced by the Council's S106 Planning Obligations/Community Infrastructure Levy SPD.
604. Discussions with Grosvenor about the Heads of Terms for a s106 made some progress, but the details terms have not been agreed and no draft s106 agreement is in place. In the event that permission were to be granted, including following an appeal to the Secretary of State, it is recommended that the following terms would need to be secured to mitigate the impacts of the development.
605. Section 106 Obligations
- Securing private rented units as PRS for minimum of 30 years.
 - Securing appropriate level and tenure of discount market rent housing in perpetuity
 - Securing public roof terrace (opening hours and management)
 - Securing public realm provisions, including the two routes through the railway viaduct
 - Delivery of the school in the first phase
 - Phasing plan
 - Marketing, allocation and fit-out of wheelchair units.
 - Local economy: construction phase job/contributions
 - Local economy: construction phase employment, skills and business support

plan

- Local economy: 'end use' jobs/contributions
- Local economy; loss of employment floorspace mitigation contribution
- Local economy: 'end use' employment, skills and business support plan
- Support for initiatives to secure the vitality of the Blue shopping centre
- Highway works
- Highways bond agreement
- Exclusion of all occupiers from attaining parking permits (apart from Blue Badge holders)
- 3 years free car club membership for all eligible adults
- Connection to SELCHP and measures set out in Energy Statement
- £300,000 TFL contribution to local bus provision
- Safe-guarding of land for two standard-sized cycle hire docking stations, along with a contribution of £550,000 TFL contribution towards the delivery of this infrastructure.
- Community Use Agreement for D1/D2 floor space including school
- Affordable workspace
- Retail parameters
- Construction and environment management plan
- Parking restrictions

606. Without these obligations being secured, the development would not provide sufficient mitigation to address the impacts on matters such as, education, open space, play, employment and transport facilities, in line with the requirements of the development plan.

Other matters

607. Construction is adjacent to Network Rail active rail line. Appropriate measures to protect the operation of the railway would need to be secured during construction.

Conclusion on planning issues

608. This is a very significant development which has the potential to deliver a number of key benefits to the area. It regenerates a declining industrial site to offer increased employment within business, retail and leisure uses. It provides 1342 new homes for rent, which would be delivered and managed by Grosvenor. It provides new premises for the Compass school, which is currently operating from sub-standard buildings. It also opens up the site with new routes and public spaces, and additional tree planting and greening. These benefits of the development must be recognised and given due weight in reaching a decision on the application. The new school in particular, would have clear benefits for local children, improving their learning environment, and this is a priority in policy at all levels.

609. However, the application also has a number of clear conflicts with adopted and emerging policies, and these must be weighed against the more positive aspects of the proposal. A key consideration is the failure to provide what the Council considers to be the maximum reasonable level of affordable housing. The amount of affordable housing fails to comply with adopted policies in the Southwark Plan and Core Strategy, and the tenure mix and affordability of the affordable units fails to comply with both adopted policies, and the emerging policies in the New Southwark Plan and the draft new London Plan. The submitted viability assessment does not demonstrate that the applicant's affordable housing offer is the most the development can viably support, and the term for which the Private Rented Housing is secured does not meet the minimum requirement of the Submission New Southwark Plan.

610. The quality of a number of the new dwellings is unsatisfactory, and fails to meet the requirements of the Southwark Residential Design Standards SPD, or the quality of housing requirements of the new London Plan, in terms of the aspect of the units and the provision of adequate private amenity space. There are no inherent constraints on the site or development which could justify the failure to provide exemplary accommodation for the future residents.
611. Whilst the servicing strategy and parking arrangements for the site are broadly acceptable, the planned service routes create potential points of conflict with pedestrians and cyclists using the new routes. This risk to highway safety is not acceptable and fails to comply with policies of the Southwark Plan, Core Strategy and submission NSP.
612. The site layout and pedestrian movement strategy places emphasis on the benefits of two new routes under the railway viaduct linking the site, and the area beyond, with the shops and amenities at the Blue shopping centre and the residential areas to the south. However, the arches are not within the applicant's ownership or control, and there can be no certainty that these routes could be delivered as part of this application. The routes are a requirement for any development of site allocation NSP10, but it is not clear that this development would have the ability to bring the routes forward.
613. Issues relating to the height and design of the buildings, and the impacts on amenity, including daylight, sunlight and privacy have been the focus of several of the objections to the application. Whilst the buildings are larger than the immediate context the design has been supported by the GLA and Design Review Panel, and on balance the massing and design is considered to be acceptable, and in many respects the design is high quality. The impacts on amenity does extend beyond the level recommended by the BRE, and some harm is acknowledged, but the report concludes that this impact would not be sufficient to warrant refusal of the application on these grounds
614. The application was accompanied by an Environmental Impact Assessment, and this was scrutinised on behalf of the Council by external specialists. It is concluded that nothing raised in the EIA would be of sufficient concern to warrant refusal on any of these matters.
615. The large number of responses to the application has been noted, including the substantial number of objections. The issues raised have been set out in the report.
616. In conclusion, whilst the benefits arising from the development are noted and accorded weight, the harm caused by the failure to comply with policies relating to affordable housing, housing quality and highway safety do outweigh these benefits, and the lack of certainty about the delivery of the new routes towards the Blue undermines the weight which could be given to the benefits for pedestrian movement and the shopping centre. On this basis, it is recommended that planning permission be refused for the reasons set out in the attached decision notice. This decision would be subject to referral to the GLA.
617. In the event that the application is called in by the Mayor, or in the case of an appeal to the Secretary of State, the report sets out the matters which would need to be secured through a s106 agreement in order to properly mitigate against the impacts of the development.

Community impact statement

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

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

Consultations

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

Consultation replies

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

Summary of consultation responses

621. The application has been subject to two rounds of consultation. The initial consultation commenced on 9 November 2017. Revised plans were submitted during the course of the application and a further round of consultation was undertaken commencing on 15 June 2018. A total of 176 comments have been received with 148 in objections, 24 in support and 4 providing general comments. The detail issues raised are set out in the tables below.

Table 21 – Objections from Members of the Public

Objection	Officer Comment	Raised
The application does not provide an appropriate level of affordable housing	Officers are of the view that the level of affordable housing proposed would not be in accordance with existing and emerging policies. Accordingly refusal is recommended on this ground. This is covered in the Affordable Housing Section of the report.	115
The application would not provide an appropriate level of social rent accommodation	The depth of discount for the proposed affordable housing would not provide units at social rent equivalent levels	102
The proposed buildings at a height of up to 28 storeys would significantly exceed the height of neighbouring buildings and be out of keeping with the character of the area. Particular concerns with: <ul style="list-style-type: none"> - Clements Road - Webster Road - Keeton's Road - Blue Anchor 	The development would include a number of buildings that would exceed the height of the surrounding area. The tallest buildings are situated in the centre of the site away from nearest residential properties. There are wider benefits associated with the design including very generous public realm provision and the retention of building BF-F with a publically accessible roof terrace. The design is considered in more detail earlier in the report.	36

Lane		
<p>The proposed development would overshadow neighbouring buildings and result in a loss of daylight and sunlight including to:</p> <ul style="list-style-type: none"> - 23, 31 Clements Road - 90 Storks Road - 24, 92 Webster Road - Four Squares Estate - Blue Anchor Lane - Bridgestone House - Marsden Square - William Ellis Way 	<p>The development would have some significant impacts in excess of BRE guidelines. These are considered in detail in paragraphs 379-490. Whilst there will be breaches of the BRE guidelines such impacts are not unusual in dense urban locations and the impacts identified in the Daylight and Sunlight Assessment should be considered against wider policy context, local townscape and the need to optimise the development on site.</p>	16
<p>Increase in population will place additional pressures on infrastructure which is already at capacity, including:</p> <ul style="list-style-type: none"> - Doctors' Surgeries - Sports facilities - Schools - Dentists 	<p>Should the proposed development go ahead CIL payments towards Mayoral CIL and Southwark CIL would be secured. Southwark CIL will provide funding to help deliver a range of borough-wide and local infrastructure projects that support residential and economic growth and benefit local communities.</p>	16
<p>Detrimental Impact on public transport infrastructure including:</p> <ul style="list-style-type: none"> - Jubilee Line/ Bermondsey Station - Cumulative Impact on Overground 	<p>The impact of the proposed development on local transport infrastructure has been assessed by TFL and the Councils Transport Planners. They have advised that the proposed development would have an acceptable impact on local transport infrastructure.</p>	15
<p>Public consultation was misleading as:</p> <ul style="list-style-type: none"> - no details of building heights - No details of daylight report provided 	<p>The Council encourages applicants to undertake public consultation prior to submission of applications. The applicant has submitted a Statement of Community Involvement with the application which sets out the consultation with the community undertaken over the past 3 -4 years. Their approach has involved 4 phases of consultation (Autumn 2015, March 2017, June 2017 & October 2017). Their activities included:</p> <ul style="list-style-type: none"> - Appointing a Community Engagement 	12

	<p>Manager</p> <ul style="list-style-type: none"> - Letter drops to 9000 residents/businesses in local area. - A project website which has received over 4000 visits. - Regular meetings with local businesses, charities and organisations - Contributions towards local events/hosting events on site. - Communications with details of community engagement and investment programme - On site information and a community office open for informal drop-ins to allow the community to view the proposals and discuss issues with project team. <p>The document notes that potential heights of buildings were raised as a concern in earlier consultation phases. Phase 3 detailed proposed locations and approximate heights of buildings. Phase 4 included a 3d model showing the heights of proposed buildings.</p>	
<p>The additional residential and commercial traffic associated with the proposed development would exacerbate existing congestions and road network capacity problems.</p> <ul style="list-style-type: none"> - Jamaica Road - Drummond Road - Around School - Around the Blue - Rotherhithe Roundabout - Webster Road 	<p>The transport and highway impacts have been reviewed and are covered in the relevant section of the committee report. Both TFL and Southwark Transport Planners are satisfied that the highway impacts on surrounding road network would be appropriate and acceptable for a development of this site.</p>	11
<p>Noise and nuisance from:</p> <ul style="list-style-type: none"> - 24hr cycle storage - School - Construction traffic - Railway 	<p>Noise is considered in the relevant section of the report Should the application be approved mitigation would be required to ensure no detrimental impact on neighbouring residents in terms of noise and disturbance.</p>	10
<p>Air/Dust Pollution from constructions</p>	<p>Mitigation to control impact on dust and air pollution would be required if the application were to be approved. These could be secured through the CEMP.</p>	10
<p>The proposed affordable accommodation would be at 75% of market rent, which</p>	<p>This is covered in the Affordable Housing section of the report.</p>	6

is not affordable		
The application makes no mention of what will happen to the existing businesses who are currently occupants.	The existing businesses on the site are all on short term leases with favourable terms in the knowledge that redevelopment would occur, requiring vacant possession of the premises. There would be some opportunity for these businesses/community organisations to enter into new agreements with the Applicants post-development to occupy space in the new development	4
Insufficient parking provision with a particular impact outside of resident permit hours.	The development is in an appropriate location for low levels of car parking given the good public transport accessibility and its location within a Controlled Parking Zone. A s106 agreement would be required to remove the rights for new residents and businesses to obtain a parking permit.	4
Issues with construction traffic/disruption	A draft construction management plan was submitted with the Application. If the application were to be approved the mitigation proposed would be secured through the section 106 and further details would have to be submitted for approval to show how noise and disruption to the highways and surrounding properties would be minimised during the demolition and construction periods.	4
There is minimal Green Space in plans	There would be a significant increase in the number of trees on site as well as prominent areas of public realm with a good proportion of green space.	3
Proposal would create transitory population	Grosvenor proposed to manage the development over the long term. This long term commitment and the management measures proposed would help mitigate against the issues associated with a transitory population.	3
Regeneration will not benefit all residents	The development would bring some significant regeneration benefits including improved school facilities and new homes and job opportunities, and new routes through the site	3
The proposal results in an excessive provision of studio flats.	The issue of housing mix is covered in the relevant section of the report. Paragraphs 214-219	2
Road Safety issues associated with additional traffic on local road network	The applicants have prepared a number of Road Safety Audits assessing the impact of the development on Road Safety.	2
Proposed tall buildings will cause wind tunnels	This is covered in the relevant section of the report, at paragraphs 582 to 585.	2
Loss of Privacy to neighbouring residents	This is covered in the relevant section of the report at paragraphs 372 to 378.	2
Design of Plot D&E unsightly	Design issues are covered in the relevant section of the report at paragraphs 280 to 358.	2

Loss of view	The right to a private view is not a material consideration which the planning system can preserve.	2
No intermediate housing	The DMR housing is an intermediate form of housing	1
Blank wall at ground floor on Webster Road bad design	The applicants have amended proposals to provide duplex units with active frontages onto Webster Road in place of the cycle stores previously proposed.	1
Grosvenor not been able to manage existing uses	Should the application be granted measures to protect neighbouring amenity could be put in place including hours of use, delivery and servicing management plans etc.	1
Revisions not significant	The applicants have submitted amended proposals during the planning process. This report is based on the amended proposals.	1
Prospective residents would not shop at the Blue	The proposed development could provide spin off benefits for the Blue as a result of the improved connections (if these can be secured) and the increase in residents and employees on site.	1
Years of disruption from construction	It is recognised that there would be disruption associated with a long term construction project. The draft CEMP would seek to provide measures that would mitigate harm to ensure that any disruption is mitigated.	1
Too much Housing	There is a significant housing need within the Borough and across London	1
Loss of trees	This is covered in the relevant section of the report at para 359 to 367.	1
Proposal would increase crime levels	The Met Police Design Advisor has assessed the proposals and sees no reason why it should not be able to achieve Secure by Design accreditation	1
New proposal will drive up rents on neighbouring buildings	The rents of neighbouring buildings are not a material planning consideration.	1
Proposed accommodation too expensive	The viability of the proposed development is covered in the relevant section of the report at paragraphs 167 to 213.	1
Reduction in community space	The proposals would result in the provision of a replacement school and additional community space. The replacement school would meet the requirements of the Compass Academy who would occupy the building.	1
School site is protected for education use and there is an agreement that existing playground is site of WW2 bomb and there is an agreement not to build on the site.	The Historic Environment Assessment notes that the site and surrounding area were badly damaged by bombs during WW2. It however notes that there was only minor damage to the school. There is no reference to an agreement not to build on the school site.	1

Too many plans on website difficult to view proposal	The Council's website has a 5mb document size limit which results in large documents having to be broken down into separate parts. This does result in a large number of documents appearing on the Council's website.	1
No detail of affordable housing offer	This is covered in the Affordable Housing Section of the report at Paragraphs 167 to 213.	1
Proposed design would not fit in with character of railway arches	The design and impact on surrounding area is covered in the Design section of the report at paragraphs 280 to 358.	1
Design Review Panel have impacted negatively on the proposed architecture	Design Review Panels are identified as important aspects of the assessment process, providing expert, but independent, advice to the Council.	1
Poor Quality of accommodation	This is covered in the Quality of Accommodation section of the report at paragraphs 226 to 279.	1
Studios provide poor quality accommodation	The provision of studios and quality of accommodation are considered within the relevant sections of the report at paragraphs 214 to 219 and 226 to 279.	1
No need for this amount of retail	Retail issues are considered in the relevant section of the report at paragraphs 97-120.	1
Flats will be bought for investment purposes	The flats would be restricted from private sale for a covenanted period of time. Grosvenor have stated that it is their intention to manage the units including the DMR over the long-term	1
Architecture pastiche	The proposed architecture is considered to be of a high quality as set out in relevant paragraphs 280 to 358.	1
Shops would be unaffordable for local residents	Retail issues are considered in the relevant section of the report – the type and price point of individual retailers is not something which can be controlled through the planning system.	1
Cumulative impact in conjunction with Canada Water Proposals	The cumulative impacts have been considered within the Environmental Statement.	1
Negative impact on railway arches	The proposal would provide an opportunity to improve the Low Line route in accordance with Council's Strategic objectives.	1
Tall buildings have a negative impact on health	The design and public health implications of the proposed development are addressed in the relevant sections of the report.	1

622. A total number of 24 comments were submitted in support of the proposed development while a number of the objections also supported or recognised certain positive aspects of the proposed development. The aspects of the development which representees are in support of are:

Table 22 – Public Comments in Support

Support	No of times
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	raised
New pedestrian routes including links through the arches	9
New homes in an accessible location.	8
Benefits for the Blue associated with new pedestrian routes	7
Welcome the regeneration of this part of Southwark.	6
- Long Term commitment of developers	6
Proposal will generate employment opportunities	6
New School to be provided	6
Good public consultation	5
Use of bricks complements areas historic character	4
Proposed buildings are modern and in keeping with their surroundings (there are other towers in the area).	3
Good public realm proposals and new greening proposed	3
Supportive of new development but lower scale required	3
Retention of Building F connects site with its past.	2
The proposal contains social housing	2
Welcome pepper potting	2
Good use of a largely vacant industrial site	1

Ward Councillors for North Bermondsey Ward

623. Liberal Democrat Councillors for Riverside Ward recognise and support many positive aspects of this planning application but, like many residents, we have serious concerns.

Building heights

624. We are frustrated that, after 4 years of community engagement, Grosvenor has only mentioned the specific heights of buildings in recent months. Even now, they don't make the planned heights clear in their communications. It is unacceptable to us that there are over 15 blocks planned with heights of seven or more storeys. This will fundamentally change the character of our area and be overbearing for neighbouring homes, none of which are more than six storeys. We need new housing in London, but these heights are too much.

Genuinely affordable rents for local people

625. The rents on this site must be a real mix, especially so that people on low incomes can afford to live here. We are outraged that Grosvenor's planning application does not meet the council's policy of 35% 'affordable' housing. The policy means that 35% of the new homes should be less than private market rents, but Grosvenor is proposing far less than this. We are also concerned that the 'affordable' rents they are proposing are not really affordable. They are saying that the 'affordable' rents will be on average 75% of private market rents. This is still very high rent. We believe that one in three properties should be at the same level as council rents (50% of private market rents).
626. We also want to see priority for the new homes given to existing Bermondsey residents as they are the ones who will put up with the disruption.

Infrastructure health, transport and education

627. We are also troubled about the impact of such high density on local infrastructure like GPs and transport. Local GP surgeries already have waits of several weeks for appointments, the Jubilee Line is already overcrowded and Jamaica Road is already gridlocked. An additional 1,350 flats must not be approved without additional GPs and

investment in transport, including the bike hire scheme.

628. Parking is a big concern for local residents and the neighbours are already detrimentally affected by visitors to the gym on the Biscuit Factory site taking up local parking spaces at evenings and weekends. We are not convinced that the current plans for parking for businesses are satisfactory and parking and the servicing and deliveries for the new businesses proposed must be considered more carefully.
629. It should also be remembered that the Southwark College site was originally all for educational use. While we are pleased that the Compass Secondary School will have a home on the site, this is still far less land than was originally designated for educational use. A borough which is short of primary and secondary school places and quality 14-18 technical education should not let go of educational use land lightly and the benefits of doing so must go to the local community. The developers must support vocational training on the site as well as academic education.

Local economy

630. We very much welcome opening up pedestrian routes into the Blue and the work which the developer has been doing to support the Business Improvement District there. However, it is essential that the new retail in the Biscuit Factory site complements and supports the Blue, rather than competes with it.
631. Liberal Democrat Councillors will continue to work with local residents, Grosvenor and planning officers to ensure that this major development in Bermondsey brings positive benefits to all the community, while fighting for a much better deal for local residents on heights, rents and infrastructure

Councillor Stephanie Cryan (Rotherhithe Ward)

632. As a councillor in a neighbouring ward I object to this application.
633. The level of proposed affordable housing is not policy compliant and does not include any social housing. At a time when we have over 11,000 households on our general needs housing list it is inconceivable for a developer to submit an application that does not provide housing that is affordable for the majority of local residents and there is nothing in the proposal that helps address the housing crisis.
634. If Grosvenor are serious about their commitments and long term ambitions for Bermondsey they seriously need to rethink their proposals and provide decent, truly affordable and social housing for the many and not high end rental for the few.

Councillor Bill Williams (Rotherhithe Ward)

635. I am writing to object to the planning application for the redevelopment of the TOWER BRIDGE BUSINESS COMPLEX, 100 CLEMENTS ROAD AKA THE BISCUIT FACTORY & BERMONDSEY CAMPUS SITE, KEETONS ROAD LONDON, SE16 4DG (ref:17/AP/4088).

Affordable Housing

636. As a Councillor in a neighbouring Ward I am concerned this application does not propose a policy compliant affordable housing mix. Southwark's policy for this site requires a minimum of 35% affordable housing, of which 70% must be social rented. This should provide around 470 affordable units in total, about 330 of which should be social rent. Grosvenor is proposing 27.5% affordable housing, but not social rented

housing. The affordable housing will also be affordable rent at an average 75% market rent, near the maximum 80% market rent allowed. Since 2011 Southwark Council has maintained that affordable rent does not meet the borough's housing needs.

637. The development will be on the doorstep of neighbourhoods that are amongst the most deprived in the country and the borough has a desperate need for social housing. There can be no justification for approving this application and it should not be considered until there is a policy compliant mix of affordable housing.

Residents Groups

Bermondsey Business Improvement District

638. Blue Bermondsey Business Improvement District have worked with Grosvenor on helping to shape their plans, give input and better understand the impact this will have for local businesses and the community. There are concerns that the addition of a considerable amount of new retail space may have an adverse effect on the Blue and its retail shops but a belief that with Blue Bermondsey BID continuing to work closely with Grosvenor over the ongoing process of the development, it can be ensured that the new commercial and retail uses being proposed will complement rather than compete with existing business in the BID area.
639. It is crucial that business rents are set at a realistic level to attract and support SME and start-up businesses, with the emphasis on creating training and employment opportunities for local people, who must see real tangible benefits. It is essential that the council support Blue Bermondsey BID and local stakeholder's proposals to bring improvements to the public realm in and around Southwark Park Rd to avoid creating two conflicting neighbourhoods at opposite ends of the social scale. The Blue has long been in need of major investment to combat the growth in neighbouring areas such as Surrey Quays and Old Kent Rd to offer a better visitor experience and enhance the strong community spirit which the area is renowned for. If the ongoing partnerships that have been established continue to function, with the support of the council and the considerable concerns of local residents addressed and managed, long term benefits on an unprecedented scale can be realised, bringing greater prosperity and a greater sense of community for its businesses, incoming and lifelong local residents.

Chair of 4 Squares Leaseholder Action Group

640. I am writing this as Chair of the 4 Squares Leaseholder Action Group. Our estate is directly opposite this planned development and a lot of leaseholders have lived here for over 40 years since the estate was built and are the original Right to Buy leaseholders.
641. Everyone who has participated in our discussions on this development has expressed severe concern over many aspects. We would like this consultation process extended before any permission is granted so the exact plans and method of construction / traffic plans / road closure plans can be clearly explained to our group and further comments invited, to address all of our concerns. Our members feel the drop in sessions did not make it clear what was intended and what was initially promised kept changing for bigger higher plans to be included, going against initial assurances this would not happen.
642. We are deeply concerned with regard to the apparent changes in fundamental aspects of the scheme. I outline beneath some of the fundamental areas of concern.

- Initially the new school was advertised as having 400 pupils, now it appears to be planned to have over 1200. The existing school online states it has 187 pupils. Even if the new school has 400 pupils that's in excess of a 200% increase in numbers. If the new school has 1200 pupils that's over 6 times more pupils not to mention parents collecting, pupils using local buses, the tube, etc - what provisions have been put in place to accommodate this huge extra traffic? Grosvenor should be asked to contribute to this and we want to see evidence of a detailed social impact plan and how all these issues will be addressed satisfactorily.

- We are also told the school will be accommodated closer to the railway arch area of the site which means more noise to distract the pupils and the high rise residential accommodation closer to the Drummond Road area, when it should be the other way round. Why is the school not closer to Drummond Road and the high rise blocks further away from Drummond Road - we would like to see this.

- One member states that there was a court case about 10 years ago where there was a similar proposed development of this site and it was ruled that nothing could be built higher than the existing surrounding 6 storeys. So why now is everything going so much higher, as we believe this court judgement needs to be overturned in order to allow this legally? If this has happened please provide proof of this?

- One major issue is the loss of light for all properties on the east side of Drummond Road. With loss of view a close second. This will lower the value of all these flats.

- The height and proximity of these proposed buildings is both excessive and inappropriate and clearly demonstrates a lack of concern for the existing visual amenity and loss of actual light. It is clear from the proposals that no forethought or consideration has been given to the existing buildings.

- It is also clear that the development could have been configured to reduce the visual impact and loss of amenity and we ask the question as to why this exercise was not carried out. Whilst we appreciate the height of the high rise buildings seem to be staggered from the lowest at Drummond Road and the highest closer to the railway, the height of the Drummond Road buildings still greatly exceed what is already there and excessively encroaches on the surrounding buildings when some forethought of this would with no doubt alleviate some of the worst excesses of this encroachment.

- We therefore reiterate our concerns and assertion that further extended consultation is needed in order that the rights of the individual owners in proximity are not trampled upon as is currently the position.

- It appears that the parking allowance is minimal and insufficient and we ask for your traffic plans and modelling of the parking and traffic use of the estate surrounding areas going forwards for these proposed new 1200 + residents.

- It was initially promised that Grosvenor would provide a new medical centre to service the new 1200 + residents, as the existing doctors in the area are already oversubscribed. This appears now to not be happening - why not and we consider that this is paramount as a condition to the approval of the planning application.

- We also note the lack of shopping amenity associated with the development and we again reiterate our concerns and request that a study is carried out to ensure that sufficient shopping amenity is provided for the benefit of both existing and new residents.

Keetons Estate TRA

643. Object on the following grounds:

- The height is excessive and will block light to neighbouring properties
- While new housing and retail is welcomed this will lead to parking problems on surrounding streets
- The additional population will place a strain on existing infrastructure such as GP surgeries and Schools.

644. The rents for the proposed accommodation is very expensive and the DMR at 75% market rent is too expensive for the people of Bermondsey.

Big Local Works

645. The Big Local South Bermondsey Partnership/Big Local Works have worked alongside Grosvenor to improve opportunity for local people particularly around the area of the Blue and this work has been going on for over two years prior to planning application being sought.

646. They have worked hard to understand the needs of the community and to ensure that the existing community are able to take full opportunity of new economic prosperity coming to the area which is so desperately needed. They have achieved this by supporting business enterprise training at Big Local Works just as one example.

647. The development of this property provides much needed housing and incorporates areas for community use. The key to this development is that Grosvenor are here for the long term and are therefore committed to a planned community cohesion and development strategy.

648. As a group we have worked with many developers and have found that in this instance our feedback to them has been listened to and acted on so we feel quite positive towards this planning application.

Southwark Conservation Area Advisory Group

649. The Peek Freans' Factory site, Southwark's 'Biscuit Town' is one of the last and most impressive former industrial sites in Southwark and in greater London. This site deserves inventive and an architecturally inspired re-development. While there are many commendable features to this proposal, in general the CAAG panel felt that having one architectural practice handle such a large site was a real problem. The designers were spread too thinly, resulting in banal and featureless elevations to many of the large housing blocks. Southwark planning and conservation must advocate for better, higher quality detailing for this wonderful, historically important site in the north of the borough.

650. The panel noted the location of the site between the rail viaducts and the "Four Squares" Estate. The inclusion of more historic manufacturing buildings in the development than in former schemes was welcomed. The scheme, for which outline consent has already been granted, would be particularly visible to passengers on the huge number of passing trains on the viaduct to the south. Whilst it did not include any CA's or listed buildings, the size and height of the development was thought bound to impact on some.

651. The continual line of the bold Victorian brick rail viaducts was noted. These are a major feature in the area and will have a big impact on the appearance of the built

scheme and it is important that schemes for their improvement, stated to be under consideration by Network Rail, come to fruition. Links to "The Blue" to the east and two through the rail viaducts to the south were welcomed, though a further central one would be welcome. Members were pleased to note that the proposed development incorporated the old main biscuit factory building. The inclusion of a small secondary school for c.600 pupils and of 7 stories, one for each of its "houses" (reportedly designed in close collaboration with its "enthusiastic" head) was noted. It appeared to offer a strong and appropriate design for the site, providing contrast and interest to this huge development. Improvements to the hard surfaced courts and the Church on the Drummond Road side, as part of the scheme, were also welcomed.

652. The incorporation of a number of tall buildings in the application was noted and regretted, but acknowledged as probably inevitable in the current climate. Notwithstanding, some of the views into the site appeared to be dominated and not enhanced by them and this was regrettable. It was also feared that they would create unfortunate overshadowing of parts of the scheme. The proximity of some towers to each other was highlighted as worrying. The shape and lack of modeling of them was thought unfortunate, as was their repetitive fenestration and the sheet cladding selected for some of the buildings. Members were surprised at the widespread lack of external balconies, contrary to council policy. The omission of them appeared to contribute to the dullness and repetitive nature of the facades. Big heavy panels incorporated on some blocks were thought inappropriate and the metal box/biscuit tin inspired cladding and profiled glass on others was considered to be inappropriate too and thought to appear cheap and temporary. The use of brick elsewhere was seen as fitting with the industrial character of the area and wider use of this cladding material was urged.
653. It was noted that, in contrast to e.g. the adjoining 7/8 story "Four Squares" Estate, the proposed scheme had little or no private external quiet green space. Rather all blocks appeared to look out onto largely hard surfaced "public realm" and offer no significant private or semi-private space. More green areas should be introduced. A wish to see a reversion of housing design towards high density medium-rise designs inspired by estates such as Lillingon Gardens (off Vauxhall Bridge Road) was expressed.
654. Looking in more detail: whilst retention and repurposing of the huge central space of the old biscuit factory with its imaginative tiered form and its introduced light wells was applauded, members wondered whether the corridor access arrangement of the flats and their lack of through ventilation was satisfactory and accorded with council policy. This accommodation seemed perhaps more akin to hotel suites than homes.
655. It was noted that the area is technically in a flood risk zone and hence the residential accommodation is located with its lowest floor half a storey up. Resultant street elevations thus had blank walls at pedestrian level, resulting in a lack of natural surveillance and a feeling of insecurity for passing pedestrians. It was suggested that, as a minimum, front doors and entrance spaces should be sited at ground level to reduce this concern.
656. More green roofs were encouraged. It was noted that the trees proposed were predominantly small types whilst the scale of the development demands large forest trees: eg. London planes or Norway maples. The inclusion of tree planting along Drummond Road and Clements Road was commended, but needs to go further and include both sides of these roads to create boulevard style streets. If the CGI's were reliable, night-time lighting appeared well designed and enhancing.

The Toronto and Montreal House Residents' Association & other parties

657. The following comments were originally submitted in support of the proposals. Since then they have requested that their comments are treated as neutral as they were not aware that the social housing component fell below 35% and because they remain unclear about the issues relating to the environmental impact. Original comments:
658. It is wonderful that they wish to integrate 'the biscuit factory' as part of the site because it has captured the imaginations of those living locally for many years. Overall, the design and architecture presented has an urban feel, complements the surrounding residential blocks and its environment. The proposals have thoughtfully considered its surroundings to ensure that the buildings present an urban yet modern design.
659. With 1,342 homes proposed for rent, a new 600 pupil secondary school, employment, retail and community spaces, 3 acres of new public and play spaces, two new routes to connect To the Blue, the prospect of refurbishing peek freans warehouse, and the 140 new trees and extensive planting in and around the development. The project presents a wonderful opportunity to create homes for people to live and work in London.
660. The beautiful arches that form part of the old railways will be integrated in some way and pedestrian connections created. It is thoughtful and striking and complements the architecture leading into the London Bridge area.
661. The area could improve with:
- some additional lighting along Drummond Road;
 - investing locally for health care and after care
 - investing in community initiatives to help an area that is considered 'forgotten' to create much needed jobs and to integrate with other parts of the borough
 - The Drummond Road play space looks exciting and a place that families can bring their children to enjoy outdoor space
 - creating jobs for those living locally
 - creating opportunities to improve isolation
 - creating homes for people to live in London
 - with the additional people, a police station should be reasonably considered and supporting the neighbourhood watch scheme
 - creating opportunities for work

Statutory Consultees

Parliamentary Under Secretary of State for the School System

662. I am aware that Grosvenor Estate's planning application for a mixed-use development at the site of the former biscuit factory and Southwark College is due to be considered by your planning committee. I am writing to express my strong support for the school element of this development and highlight the impact of a delay and/or refusal of the application on the school.
663. The intention is that the development will provide the permanent site and building for Compass School which opened in September 2013 and since then has been operating from temporary accommodation on the site of the former Southwark College. Compass is a mixed, non-faith, secondary school which provides good quality places for local students. The school was inspected by Ofsted in May 2017 and rated "Good" in all categories. The school is helping to meet a need for secondary places in the north of the London Borough of Southwark.

664. The school is scheduled to be in the first phase of the development and the current programme provides for a handover of the school building in September 2021 academic year. By that date the school will have been in temporary accommodation for over 8 years, with 3 cohorts of students spending all of their secondary education in the temporary building. At the time the school opened the expectation was that the school would be in temporary accommodation for just 3 years and the investment in the temporary buildings was based on a short-term occupation. A refusal of the planning application will mean considerable uncertainty for the school and delay to the school transferring to its permanent building. This will further increase the number of pupils that will not have the opportunity to benefit from the facilities provided by the new building.
665. The applicant has entered into extensive and positive engagement with my officials on the planning suitability of the site. This is reflected in the design of the proposed school, which complies with our guidance (Building Bulletin 103) and we believe will have a positive impact on the local community.
666. In terms of the planning merits of the proposed school, there is a strong presumption in favour of granting planning permission for new schools in the Joint Ministerial Statement — Planning for Schools Development (2011) and the National Planning Policy Framework (2018). This is echoed in local and regional planning policy.
667. Following extensive public consultation, the site is an Allocated Site (NSP10) within the draft New Southwark Plan (Proposed Submission Version) (Dec 2017), which includes a Site Vision that any redevelopment must, amongst other things, provide a replacement school (DI). The proposed development for a replacement secondary school therefore fully complies with the Council's vision for the site. In doing so, the proposed development also meets Strategic Policy 4 of the adopted Core Strategy (2011), Saved Policy 2.4 of the Unitary Development Plan (2012) and Policy 3.18 of the London Plan (2015) by addressing educational need in an area of deficiency, improving choice and encouraging the supply of good schools.

Environment Agency

Response to original consultation

668. Thank you for consulting us on this application. We have reviewed the information submitted and have no objection to the proposed development, but would like to offer the following advice.
669. The River Thames flood defences in this area defend the site to a 1 in 1000 year annual probability of river flooding in any year (<0.1%). Areas of residual flood risk can occur due to failure of the flood defences or a design flood event greater than that mentioned above. However, there may be other sources of flooding that affect this site, for example, surface water, sewer, or groundwater flooding. Under the Flood and Water Management Act the local authority has the lead role in these matters and consideration of these other sources of flooding may be necessary to inform suitable mitigation measures to reduce the impact of flooding.
670. The basement of the development is to be used for car park and ground floor for residential lobby, bicycle store, plant and refuse space. We would also draw your attention to in regards to recommendations for basements stated within Southwark SFRA Appendix G which must be restricted solely to non-residential uses and basement thresholds must be raised above the 2100 maximum water level. In addition, internal access to upper floors must be provided and flood resilient design and construction techniques employed.

671. From June 2017, we have begun using model data for the tidal Thames floodplain, as a replacement for modelling created by CH2M in March 2015 for areas upriver of the Thames Barrier. The submitted FRA contains modelled flood data from 2015 and therefore out of date and has been superseded. As a result we would recommend that you obtain an updated Product 4 to support your FRA accordingly with this new information. Please contact our Customers and Engagement by email at kslenquiries@environment-agency.gov.uk to obtain our modelled breach levels.
672. The latest modelled flood levels for the proposed site range from 2.45mAOD-2.7mAOD therefore the proposed residential floor levels are above modelled flood levels.
673. The FRA makes consideration for the following mitigation measures that should be adhered to:
- Flood resilience – the proposed development provides the opportunity to protect inhabitants by adopting flood resilience measures that take into account predicted effects of climate change. We would strongly recommend that flood resilience is incorporated into the design and construction. Information on flood resilience can be found on the following link:
http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf.
 - Flood warning – there is a recommendation to notify residents and encourage them to sign up to the EA flood warning systems to provide them with advanced notice in the unlikely case of a flood event. We strongly recommend that occupants register with the Environment Agency's flood warning service, 'Flood Line', so that they may prepare themselves in case of a flood event.

Response to re-consultation

674. We have reviewed the amended plans and cover letter from Nick Brindley at Gerald Eve dated 4 June 2018. The submitted plans and drawings show that all sleeping accommodation remain at upper ground floor/mezzanine level or higher as outlined in the original application. Additionally the amendments will not pose an increase in potential groundwater contamination compared to the original application. Subsequently we have no further comments to make and refer to our previous comments reference SL/2017/117692/01 dated 5 December 2017

Greater London Authority (GLA) stage 1 report

- 675.
- Principle of development – Residential-led mixed use redevelopment and intensification of this site is strongly supported in strategic planning terms
 - Employment – The proposed 31% uplift in employment space over the extant permission is strongly supported. A component of affordable workspace is strongly encouraged where there is evidence of local need.
 - Education facilities – The proposal to deliver a high quality educational facility for Compass School Southwark is strongly supported. A community use strategy and construction stage impact mitigation measures must be secured.
 - Housing – Whilst the proposed increase in housing supply is strongly supported, in the absence of an independently verified position the proposed 25% provision of affordable housing is unacceptable. The applicant must deliver deeper DMR discounts, including London Living Rent.
 - Transport – The applicant must address issues with respect to: car parking and drop off/pick up; walking and cycling routes; cycle hire contribution (safeguarded land and £550,000); bus capacity contribution (£300,000;

- servicing and construction; and, travel planning.
- Recommendation – That Southwark Council be advised that whilst the scheme is supported in principle, the application does not yet comply with the London Plan and draft London Plan, as set out within paragraph 74 of this report.

Historic England

676. They are pleased to see that a number of high quality buildings which characterise the former industrial use of the site, will be retained as part of this development but more detailed comments should be sought from the Council's Design and Conservation Team and from the Council's Senior Archaeologist.
677. The height of the tallest buildings would appear at odds with the prevailing building heights of the area and the council should be satisfied that the proposed scale complies with your strategic tall building policies for the area.
678. Due to the large scale the proposed development would be visible in a wide range of local and distant views of the historic environment. The most sensitive is the view of St Paul's Cathedral from Blackheath Point (LVMF Assessment Point 6A.1). The assessment demonstrates that the taller parts of the development would be viewed as part of the cluster of tall buildings around London Bridge, and outside the LVMF Protected Vista. There are no significant concerns regarding this impact.
679. However they note from the assessment of View 16, that the proposed development would be clearly visible from within the churchyard of the Grade II* listed Church of St James. Whilst the surrounding townscape is mixed, the significant increase in scale created by this development would have some impact on the sense of sanctuary within the churchyard. This will cause a small degree of harm to the setting of the Grade II* listed church. This should be weighed against the public benefits of the scheme in determining the application in accordance with Paragraph 134 of the NPPF.
680. We would urge you to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

London Underground

681. I can confirm that London Underground Infrastructure Protection has no comment to make on this planning application. This site is adjacent to Network Rail assets. Please contact them directly to query what effect, if any, your proposals will have on the railway.

Metropolitan Police

Response to original consultation

682. Having read the Design and Access Statement relating to this application, I am encouraged to see that Appendix ii related entirely to Secured By Design. PC Mark O'Callaghan, PC Steve Watts and I met with John Green and Jason Shaw from Hilson Moran on 5th July 2017 to discuss this masterplan with regards to designing out crime, and how it could achieve Secured By Design certification. Pages 18 and 19 of the Design and Access Statement Appendix ii refer to this meeting, and outline the key points discussed. Detailed minutes were agreed at the time between both parties. I am encouraged to see that Crime Prevention Through Environmental Design and Secured By Design are integral components of this masterplan development.

683. I feel that the development could achieve the security requirements of Secured by Design, which should be welcomed, especially as it is in a high crime area. Southwark is currently the 8th highest London Borough in respect of crime, suffering from incidents of Burglary, Robbery, Assaults, Criminal Damage, Motor Vehicle Crime, Theft and Anti-Social Behaviour including drugs. It is also important to note that policies relating to the design and layout of a new development, which aim to reduce crime and disorder, remain unaffected use.
684. As stated previously, I feel that should this application proceed, it should be able to achieve the security requirements of Secured by Design. This will require the guidance of Secured By Design Homes 2016, Secured By Design Commercial 2015, and Secured By Design New Schools 2014 guides. This is alongside continued consultation throughout the design and build of this development with the South East Designing Out Crime Office to ensure that Secured by Design standards are implemented correctly. I feel that the adoption of these standards will help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment. Because the development is suitable to achieve Secured By Design accreditation, and in order to assist the development in its stated aim of achieving Secured By Design standards I would seek to have a 'Secured by Design' condition for the whole development, attached to any permission that may be granted in connection with this application and that the wording is such that the development will follow the principles and physical security requirements of Secured by Design.

Response to re-consultation

685. I have met with the security advisors, architects, and developers for this project on a number of occasions now, and the development is progressing positively with regards to Secured By Design and crime prevention. I fully believe that this development is suitable to achieve Secured By Design accreditation. In order to assist the development with achieving Secured By Design standards, I would seek to have a condition stating, 'The development must adhere to the principles and physical security requirements of Secured By Design' attached to any permission that may be granted in connection with this application. For larger developments such as this, I would seek for this to be a two-part condition, pre-commencement works and pre-occupation.

Ministry of Housing, Communities and Local Government

686. Confirmation provided that they have no comments to make on the Environmental Statement.

Southwark CCG

687. I can confirm that we do not need an additional GP facility on the Biscuit Factory site.
688. It might however be helpful to have a contribution to support the existing practices in adding capacity. This would go towards the following possible areas: Upgrading existing clinical space to allow a wider range of clinical functions to take place, converting administrative space into clinical space, adding technological solutions to allow video-conferencing etc.

Sport England

689. Sport England considers that the application conflicts with Objective(s) 3 in that it does not provide new opportunities to meet the needs of current and future generations and objective 1 (protection of sports facilities) as it results in the loss of a

climbing wall.

690. In light of the above and the lack of evidence of any exceptional circumstances Sport England objects to the application. Sport England will withdraw its objection to this application if:

- Further information is provided regarding the relocation of the climbing wall and that this demonstrates an investment in an indoor sports facility by the applicant.
- Details of on-site provision for indoor and outdoor sports facilities or details of a Section 106 that will ensure that new indoor or outdoor sports facilities, or improvements to nearby existing sports facilities will be made by the applicant.

Officer Comment

691. The applicants have responded to this clarifying that a replacement climbing wall has already opened within Existing Building A of the Biscuit Factory as part of Workspace's buildings, in anticipation of the Masterplan proposals coming forward. A planning application for the extension of this space to create a 1350sqm facility (larger than the original) was granted planning permission in August 2018. Officers have also clarified the proposed sports provision within the replacement school which would provide a new sports hall (24.3m x 17.3m x 7.2m), a roof level MUGA (24m x 16m) , open air ground floor netball area (21m x 10.5m) and covered ground floor ball court (21m x 16m x 5m). There would be a community use agreement secured through the section 106 if the application were to be approved to detail access arrangements to these facilities for members of the general public outside normal school hours. Officers also set out that there would be limited opportunity to extend the school sports hall given the existing constraints around this part of the site.

Thames Tideway

692. The proposed development at Tower Bridge Business Complex and Bermondsey Campus site is within the safeguarded tunnel alignment and the zone of influence of the Greenwich Connection Tunnel which will be constructed as part of the Thames Tideway Tunnel. Tideway does not object to the details provided in this application, subject to securing an assurance there would be no likely adverse effect on this consented Thames Tideway Tunnel.

An informative should be attached noting that Tideway require assurance that the proposed development would have no adverse effect on the Thames Tideway Tunnel.

Transport for London

693. Transport for London identified a number of issues to be resolved in relation to the proposed development. These were:

- Revision of car-parking provision for reduction of spaces
- Details on schools' coach/minibus drop-off and pick-up location
- Residents and businesses exempt of eligibility for controlled parking zone permits within the area. To be secured in the S106 agreement
- London Plan and LCDS compliance for all cycle parking provision
- Details on the exact location and design of the short-stay cycle parking spaces must be provided
- Plan showing the permitted cycling areas within the site, including the pedestrian areas too, and details should be provided

- Detailed plan of the proposed access under the railway arches and delivery via s106
- £550,000 Cycle Hire contribution and sites for two docking stations
- 24/7 public access to all pedestrians and cyclists on all routes through the site even if these are not adopted
- £18,000 Legible London contribution
- Bus service (route 381 at peak) enhancement contribution of £60,000 per annum over 5 years
- Full TPs should be secured by condition

Comments on re-consultation

Cycle Parking

694. With the changes made to the residential mix, cycle parking has been altered to meet the new proposal. The new residential cycle parking provision proposed is of 2043 long-stay and 144 short-stay spaces. The short-stay provision is compliant with the draft London Plan minimum standards; however, a minimum of 2364 long-stay spaces are needed for the residential cycle parking to be compliant with Policy T5, Table 10.2 in the draft London Plan. This should be amended and secured by condition. As the proposals for the commercial units are unchanged TfL has no additional comments to make. We can confirm that cycle parking meets the minimum draft London Plan standards and together with showers, lockers and changing facilities should be secured by condition..

Highway Access Arrangement Amendments

695. Further changes have been made to the transport strategy of the proposed development in terms of:
- Crossing point on Drummond Road
 - Right turn from Clements Road
 - Additional loading bays on Shard Walk and relocation of parking spaces from hard Walk to loop road
 - Traffic calming measures
 - Raised table at Clements Road/Webster Road
 - Pedestrian link
696. TfL has no objections to these highway changes.
697. Therefore, subject to TfL Initial Comments and additional cycle parking comments being taken into account, TfL has no further comments.

Internal Comments

Archaeology

698. Comments submitted in relation to the original consultation
699. The site lies immediately to the north of the council designated 'Bermondsey Lake' Archaeological Priority Zone (APZ), which is designed to protect the palaeoecological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the associated riverine geology and topology. The site is also just to the south of the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone (APZ). This general area has the potential to contain significant archaeological deposits of prehistoric, Roman and later date, including English Civil War defences dating from 1642-3, and mapped by Smith and Kelsey.

Also, during the post-medieval period numerous tanneries (for treating animal hides to produce leather) were established in this northern part of Bermondsey, continuing throughout the later 17th- to 19th-centuries, with the brewing industry also developing locally. The site contains various industrial heritage assets which will require appropriate measures to be in place to either preserve or record.

700. The site has a combined area of approximately 6.2 hectares (ha), current industry standards for London recommend that all major planning applications over 0.5 hectares - whether in an APZ or not - should be considered for archaeological interest. Appraisal of the site, using the Greater London Historic Environment Record (GLHER) and information submitted with this enquiry, indicates that there is potential for significant archaeological remains to survive across this large site. The applicants have submitted an archaeological Desk Based Assessment (DBA) by MoLA and dated October 2017, in accordance with Saved Policy 3.19 Archaeology of the Southwark Plan (2007) in support of this planning application. The assessment determines, as far as is reasonably possible, the location, extent, date, character, condition, significance and quality of any surviving archaeological remains liable to be threatened by the proposed redevelopment. This work helps to determine whether this development is likely to cause harm to the built and buried historic environment and, if so, what measures need to be in place to manage this; this is in accordance with best practice as set out in the NPPF and the Council's Saved Policy 3.19. As the proposal is for extensive redevelopment, I concur with the findings of the report that archaeological deposits across the site are likely to be varied and a phased approach to archaeological interest is required here.

701. There is, however, sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission - provided that the following conditions are applied to any consent:

Archaeological Building Recording
Archaeological Evaluation
Archaeological Mitigation
Archaeological foundation
Archaeology Reporting Site Work

Ecologist

702. I have reviewed this application with regards to ecology. The ecology surveys are fine. No further surveys are required. The site currently has negligible ecological value. The new landscaping and roof scape will enhance biodiversity. The development has good opportunities for ecological enhancement and green infrastructure. The amount of biodiverse roof appears to be quite small and should be extended to go under the PV panels as this optimises their performance. AG03 should be applied. Nesting features for Sparrows and other birds should be installed. At least 20 mixed boxes could be installed. Insect homes could also be installed. A SUD's system could be included in the landscape strategy, Notably around the West Yard. An ecological management plan should be produced to advise management of the new landscaping features.

Environmental Protection Team

703. Comments received in relation to the original consultation:

Noise & Vibration

704. The acoustic planning report finds that parts of the site are exposed to very high noise levels and will require extensive acoustic insulation to achieve satisfactory acoustic

amenity. Other parts of the site will require moderate or low levels of insulation. I would recommend a condition in relation to residential internal noise levels.

705. My only concern with the acoustic assessment itself relates to building BF-W. Opposite the eastern elevation is a 24hr operating petrol station and a vehicle repair workshop. Noise complaints from such uses are not uncommon. The nearest monitoring point in the assessment was L4 which was towards the railway line and shielded from these sources. When the building is built the eastern elevation will be shielded from the railway noise and so the existing petrol station and workshop may become dominant (along with the noise from Southwark Park Road). The building contains single aspect units facing the petrol station. I would want to see some additional assessment in this area to ensure that the glazing on that elevation will be suitable and also to ensure that any acoustic character issues are properly defined. A general environmental noise assessment does not cover this and the standards above relate to steady external noise sources, not commercial noise. I would recommend that a condition relating to commercial noise affecting new residential development should be attached.
706. High levels of environmental insulation tend to result in increased complaints of internal sound transference from other parts of the building. In order to reduce this problem I would suggest that a condition is added to ensure upgraded internal insulation in the most environmentally insulated dwellings.
707. The acoustic planning report also finds predicted levels of re-radiated noise and vibration from the railway viaduct that may require building mitigation. Further assessment and detailed design and mitigation is needed for Buildings BF-W, BF-R, S and T and BF-D and E. I would recommend conditions to protect from re-radiated noise and vibration.
708. Communal amenity areas will fail to meet required standards without mitigation in buildings BF-D&E and BF-R, S and T. Acoustic screening is proposed as a noise barrier. Full details of screening should be provided prior to commencement. The report admits that private balconies will fail to meet the standards in many cases but does not propose any mitigation to address this and instead relies on provision of communal amenity space. It is possible to design balconies to minimise noise via use of high imperforate screens and class A acoustic absorption applied to the soffits above each balcony. In most cases the standard can at least be met for a receptor in a seated position. Further, BS8233 states in this situation that 'development should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited'. I would suggest that a condition controlling noise levels for private amenity areas is attached.
709. Buildings BF-D, E, BF-R and T have single aspect dwellings facing the railway line, which generates high noise levels. This is poor acoustic design that will leave residents living in effectively sealed spaces with reduced amenity. Given the design has essentially started with a blank canvas, why is it necessary to design single aspect dwellings facing a significant noise source? This appears to be a case of commercial considerations overriding good design, as hinted in the acoustic report 'the other aspects of design may at times override acoustic noise impact requirements'. We did discuss this at pre-application so it is disappointing that this has not been resolved and there would be a valid argument for refusal of the application on this basis.
710. Commercial uses allow the possibility of A3, A4 and D1 use which may result in entertainment noise. The consultant has raised objections to one of our conditions and their objections do have some merit. I would recommend that conditions are

attached requiring details of protection for residential units from noise from entertainment uses as well as a condition controlling amplified noise from the commercial units.

711. In multiple locations there are potentially significant noise-generating commercial uses directly below residents which lead to a risk of internal sound transference. For example BF-F has flexible A1/A3/A4/D1 use directly below residential use, BF-R,S&T have flexible A1/A3/A4 uses directly below residential. Plots BF-04 and BC-02 are similar. This is development-wide. It is not possible to specify the necessary sound insulation to protect amenity in the absence of full details of the use, and this issue is not adequately covered by Building Regulations. Pre-occupation conditions will therefore be necessary to cover this.
712. I would also point out that BF-W has flexible B2 use directly below residential use. The developer envisions a micro-brewery forming part of the 'Bermondsey Beer Mile' however the B2 use class encompasses a huge range of industrial processes, many of which would be inappropriate for the setting and likely to be detrimental to amenity. This general B2 use is unlikely to be appropriate. Is there any way to restrict the permitted use within the use class or condition that the use is approved by the LPA prior to occupation? I understand this is normally not possible. It may be better to allow B1 use only and then consider a later change of use to B2 if a micro-brewery tenant is found. Further, the 'beer mile' breweries have tap rooms for retail sale so presumably the developer's desired use would also need flexible A1/A4 for this? Even the brewery idea comes with some concerns over noise and odours from the brewing process and would require conditions (see ventilation section below). Also, BC03 has designated several flexible B2 units directly below residential uses. The same concerns arise over the potential scope of B2 uses and the impact on residential amenity. Without some resolution to this issue I would recommend refusal.
713. Further details of plant noise will be required by condition. Furthermore the hours of opening for the MUGA should be controlled by condition and noise from servicing vehicles should be covered in the delivery and servicing plan.

Ventilation

714. As a minimum, details of suitable ventilation for BF-W and BC03 B1/B2 uses need to be approved prior to occupation, in particular in relation to the brewery element in BF-W. I would suggest it would be advisable to apply a general condition to cover all commercial uses.

Odour

715. In multiple locations throughout the site there are flexible uses including A3 use on the ground floor. The ES states 'Dedicated provision for kitchen extract ventilation to roof for A3 retail units would be considered, and riser space and plantroom space at the roof has been incorporated within the current design. This would be further considered at a later stage of the design process.' Some of the buildings are high-rise up to 28 storeys high and I think it is very unlikely the developer will discharge to roof level in such circumstances. The statement above does not amount to a firm commitment relating to kitchen discharge height/locations and there is a risk of cooking odours and amenity impacts as a result. It is very difficult to adequately control cooking odours with low level kitchen discharge. In normal circumstances this would be a reason for refusal of a development or relocation of A3 uses only to locations where unimpeded high level discharge can be achieved.

Land Contamination

716. The ground conditions assessment finds historical contaminative uses and known contamination, principally from lead, PAHs TPH and asbestos. The site contains a number of historical tanks. There is potential for other contaminants to be found. The contamination identified is not usual for urban former-industrial sites and would not present a bar to development as long as appropriate remediation is put in place. The report suggests risks are further detailed by means of supplementary site investigations following vacant possession of the Site. Further ground gas assessment is also required. A remediation strategy, remediation works and verification will be necessary. This should all be covered by the following condition (although some aspects of the condition will already be complied it would be best to impose the whole condition as there are elements within different sections which require further detail):

Construction Management

717. A draft CEMP is included however I would recommend the following conditions so detailed specific CEMPs can be submitted once construction detail is known. All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Response to the re-consultation

718. I have considered the amended plans and these do not substantially change the comments I previously made on the original application.
719. I have no further comments to make beyond those already submitted

Flood and Drainage Team

720. Comments in relation to the original consultation.

Comments on drainage strategy

721. We are pleased that the drainage strategy aims to reduce runoff rates and are happy for the site to be subdivided into catchments for this purpose.
722. As the strategy is aiming for 50% reduction, please provide the brownfield and post development runoff rates for the 1 in 100 year + 40% climate change, and the 1 in 2 year critical storms for each catchment. If there is more than one connection to the sewer network per catchment, please also provide the discharge for each connection within each catchment for these design storms. (We generally request that discharge rates are restricted to a minimum of 5 l/s per connection to the sewer network.) Please also provide the attenuation storage required per catchment to achieve the post development discharge rates stated.
723. Regarding the plan in Appendix C, Surface Water Attenuation – Combined Ground Level and On Plot, please specify the locations, dimensions and attenuation volumes of all SUDS and attenuation features; in particular green, brown and blue roofs, tanks, areas where there will be controlled flooding.
724. We note that section 2.2 Existing Site Characteristics of the Flood Risk Assessment states the site is 5.4 ha, however the plan in Appendix C refers to drainage for a total area of 49,270m². Please provide an explanation for the difference in these areas.

725. We would like to agree the details of the drainage strategy at this stage in the planning process, and construction should be carried out in accordance to the approved details.

Comments on basement impact assessment:

726. The Basement Impact Assessment section 4.2 states there were groundwater strikes at 1.46m bgl (below ground level) to 1.82m bgl, however the Flood Risk Assessment Section 2.5 states that groundwater is located at 3.5m bgl to 4m bgl. Please clarify.

Comments on flood risk assessment:

727. We note that the EA Product 4 information is not the most up to date version, please obtain the most up to date version and update the Flood Risk Assessment accordingly.
728. We recommend that non return valves are installed for all connections to the sewer network below the latest Thames Breach modelling plus 300mm freeboard, and that other flood resistance and resilience measures are considered for installation.
729. As the site is within Flood Zone 3, we also recommend that a Flood Warning and Evacuation plan is prepared for approval by Southwark's Emergency Planning Department, in particular this should include details of how occupants should be made aware of and encouraged to sign up to EA flood warning service. This can be conditioned for approval and delivery on occupation of the site.

Local Economy Team

730. Response to original consultation
731. LET note that this entire development will likely increase the number of jobs in the new development from 270 FTE to 1290 FTE.
732. It is currently anticipated that the delivery of the Proposed Development will be phased over a number of years. Plot 5, is currently at an advanced stage of construction, being delivered by Grosvenor for occupation by Workspace, and targeting completion in 2018, though it is located outside of the application boundary. The applicant may wish to negotiate a phased approach to construction job obligations, which is acceptable, provided the total requirement numbers are not decreased.

733. The planning statement notes:

'The continued use of the Biscuit Factory site for business/industrial purposes was affirmed by Planning permission 99/AP/0480, granted on 24 June 1999 for the following:

"Continued use of the existing floorspace for use for Class B1 and/or B2 and/or B8 without limitation on the total area occupied for each use"

6.5 As a result of this planning permission, there is unrestricted B1, B2 and B8 use across the buildings on the Biscuit Factory site, and accordingly, a wide range of businesses and SME currently operate across the Biscuit Factory site, particularly in the office space provided by Workspace.'

734. This is significant for considering loss of floorspace contributions

Workspace and affordable workspace elements

735. This development that provides office and light industrial floorspace should explore opportunities for the delivery of workspace to be managed by a specialist provider to support existing and new small businesses. The provider should be identified in the early stages of planning to ensure the space can be designed and tailored to specific needs.
736. This requirement can be discussed further with LET and planning as the application stage progresses, although as stated these conversations should begin as early as possible.
737. Grosvenor and Gerard Eve have stated to LET that they are in a position to begin these initial discussions.

S106 obligations

Loss of employment floorspace

738. The application form states that the existing floorspace is 42,518 GIA. Gerald Eve confirms that this includes the existing school. This figure is not dis-aggregated further and so LET have made the following assumptions through reading the planning statement in estimating any loss of employment space:
- a) The existing school size can be estimated at 2518sqm GIA;
 - b) The remaining space is B8 workspace, and the majority of the Existing Buildings on the Site are occupied and are not vacant under the terms of the “vacancy test” set out in the CIL regulations.
739. Therefore, while LET acknowledge that the proposed development includes over 12,000 sqm (GEA) of Class B employment generating floorspace across the Masterplan, there is still a net loss of 27216sqm (GEA) B8 employment floorspace, which must be considered in relation to the council's SPD and other policies seeking protection or re-provision of employment space.
740. If the development is approved without further re-provision, the loss of employment workspace will require an offset of £122,728.70.

Construction phase jobs / skills and employment requirements.

741. This development would be expected to deliver 351 sustained jobs to unemployed Southwark residents, 351 short courses, and take on 88 construction industry apprentices during the construction phase, or meet any shortfall on a pro-rata through the Construction Industry Employment and Training Shortfall Contribution.
742. The maximum Construction Industry Employment and Training Shortfall Contribution is £1,693,950 (based on £4300 per job, £150 per short course, and £1500 per apprenticeship).
743. An employment, skills and business support plan should be included in the planning conditions. LET would expect this plan to include:
- 1. Methodology for delivering the following:
 - a. Identified ‘construction workplace coordinator’ role(s) responsible for on-site job brokerage through the supply chain and coordination with local skills and employment agencies;
 - b. Pre-employment information advice and guidance;

- c. Skills development, pre and post employment;
- d. Flexible financial support for training, personal protective equipment, travel costs etc;
- e. On-going support in the workplace;
- f. Facilitation of wider benefits, including schools engagement, work experience etc.
- 2. Targets for construction skills and employment outputs, including apprenticeships, that meet the expected obligations;
- 3. A mechanism for delivery of apprenticeships to be offered in the construction of the development;
- 4. Local supply chain activity - we would expect methodologies with KPIs agreed to:
 - a. provide support to local SMEs to be fit to compete for supply chain opportunities;
 - b. develop links between lead contractors, sub-contractors and local SMEs;
 - c. work with lead contractors and sub-contractors to open up their supply chains, and exploration as to where contract packages can be broken up and promote suitable opportunities locally.

Employment in the completed development

- 744. A development of this size and with the proposed employment densities would be expected to deliver 166 sustained jobs for unemployed Southwark Residents at the end phase, or meet any shortfall on a pro-rata basis through the Employment in the End Use Shortfall Contribution.
- 745. The maximum Employment in the End Use Shortfall Contribution is £713,800 (based of £4300 per job).
- 746. No later than six months prior to first occupation of the development, we would expect the developer to provide a skills and employment plan to the Council. This plan should identify suitable sustainable employment opportunities and apprenticeships for unemployed borough residents in the end use of the development.
- 747. No later than six months prior to first occupation of the development, we would expect the developer to provide a skills and employment plan to the Council. This plan should identify suitable sustainable employment opportunities and apprenticeships for unemployed borough residents in the end use of the development.
- 748. LET would expect this plan to include:
 - 1. a detailed mechanism through which the Sustainable Employment Opportunities and apprenticeships will be filled, including, but not limited to, the name of the lead organisation, details of its qualifications and experience in providing employment support and job brokerage for unemployed people, and the name of the point of contact who will co-ordinate implementation of the skills and employment plan and liaise with the Council;
 - 2. key milestones to be achieved and profiles for filling the sustainable employment opportunities and apprenticeships;
 - 3. Identified skills and training gaps required to gain sustained Employment in the completed development, including the need for pre-employment training;
 - 4. Methods to encourage applications from suitable unemployed Borough residents by liaising with the local Jobcentre Plus and employment service providers

Response to re-consultation

- 749. Using the revised numbers from Grosvenor (-390sqm GEA residential space; change from 3795sqm retail to 3871sqm retail), there is a slight change to the employment targets – one fewer construction job, and one more end phase job.

750. As LET are prepared in our section of the Head's of Terms to consider allowing Grosvenor to deliver the same number of jobs overall but shift the amount of construction jobs to end phase jobs, these revisions are likely not significant, but for the record, we would as per our SPD current expect 350 jobs for unemployed Southwark Residents in the construction phase, and 167 in the end phase.

Public Health Team

751. I have reviewed the Planning Application and relative documents. My comments are:

1. The Health Impact Assessment (HIA) submitted is very comprehensive; in particular the chapter on baseline conditions, and identifies a number of sensitive/vulnerable receptors. The framework used to analyse each of the themes/elements identified seems appropriate and I particularly appreciated the reference to the TPCA's guidance on planning for Healthy Weight Environment and TFL's Healthy Streets approach. Having said that, the report also highlighted a few concerns, especially in relation to the New Residential Units provision (paragraph 5.2 page 44).
2. One of the reported strengths of the development is the superior design and quality of the new residential units, predicted to have a beneficial impact on health. The development will be completely tenure blind and all residents will be able to enjoy the very same access and facilities, regardless of the service charge paid/tenure type, which is very refreshing and appreciated. In the HIA, it is also argued that the greatest benefits are likely to be experienced by vulnerable receptors such as those currently living in overcrowded private rented accommodation and those on a low income or with dependent children. According to the report, these receptors will experience a major beneficial effect due to better and bigger housing and potential savings made through a more efficient heating system (paragraph 5.2.20, page 46).
3. However, at the same time I also note that expected rent levels are not specified anywhere in the report(s) and that the Affordable Housing Statement states that only 27.5% of units will be "affordable" (paragraph 1.11, page 3). This is 7.5% below the minimum amount of Affordable Housing required by the Council in the emerging New Southwark Plan (35%). Furthermore, the proportion of affordable housing will be, on average, only at 25% discount (although a more flexible approach may be taken). As correctly identified in the HIA, the shortage of affordable housing in the area is a serious issue that has repercussions on health. The lack of truly affordable housing impacts on all aspects of life, including being pushed to move to lower quality housing, or deterred away from places with better jobs and earning prospects, because these are the more expensive places to live.
4. Given that the provision of affordable housing appears to be below the expected offer, I am concerned that the vulnerable receptors identified in the HIA will be unable to experience major benefits from the proposed scheme, as high rent levels may prevent them from living in the new residential units, even those marketed at a 25% discount.
5. With regards to the demolition and construction phase, I read with interest about the various measures that will be put in place to mitigate the effect of noise and protect air quality: noise and vibration will be constantly monitored and noise barriers will be put in place where appropriate; a Site Manager will be appointed and will act as a liaison with the community sending regular and timely updates to surrounding residents. I welcome the requirement for the appointed contractor to

sign up to the Considerate Constructor Scheme. The HIA report states that, thanks to the mentioned mitigation measures and good communication with stakeholders affected, the adverse effects from noise are expected to be overall negligible or only minor.

6. Whilst the mitigation measures proposed seem generally appropriate, I am concerned about the protection specifically offered to those working in the existing work-space and Compass school children and staff. I would ask the Applicant to consider the possibility of offering additional mitigation measures where needed, such as fitting double-glazing to any existing building that will not immediately be demolished and that will still be used during the initial phases of the development. Whilst I appreciate that financially it may make little sense to fit new secondary glazing to buildings that will soon be demolished, such as the current Compass school, I am also concerned about the noise impact on the students.
7. I would like the Applicant to explore the opportunity to brand parts of their development "Smoke Free", especially play areas and the school link. Among modifiable health behaviours, smoking is by far the number one contributor of health inequalities in life expectancy. A smoke-free outdoor public realm will contribute towards making the proposed development cleaner, healthier and more pleasant.

Urban Forester

752. Comments in relation to original consultation.

The landscape design statement provides a detailed masterplan encompassing private residential and public amenity spaces. These comprise planting within courtyards, above podiums and in raised planters, major streetscape planting, a new park and green pocket spaces. The site is bordered by streets on which the majority of trees are proposed for retention, with 9 individuals and 1 group on site to be removed in order to facilitate development. A total of 11 street trees are to be removed on Drummond Street and Clements Road.

753. On site these include B, C and U category Plane, Whitebeam, Maple, Cherry, Paulownia, Elder and Holly. The revised masterplan has successfully retained the trees of greatest importance to amenity with only one large Plane requiring removal (T12). Street trees for removal include C and U category Cherry, Ash, Whitebeam, Maple and Robinia, a number of which have been damaged, together with one other category B Ash.
754. Overall, the loss of trees is more than compensated by proposed landscaping with 142 new trees and 10 other replacements on adjacent streets. This achieves a canopy coverage of 10% thereby satisfying relevant London Plan policy in terms of an increase in canopy cover.
755. The aim of the landscape strategy is to provide suitable connections into and across the site with new southern entrances via the railway viaduct arches, the opening of new uses parallel to the viaduct and the focusing of green links to Southwark Park. Other key features include the use of rain gardens along shared surface streets, a coherent hard landscaping palette with good quality surfacing and street furniture, amenity lawn, hedging and extensive play space. The lighting strategy aims to emphasise different use and character zones with bespoke bench and uplighting placed at strategic locations to enhance mood depending on the time of day.
756. Play space at the corner of Clements Road features bespoke biscuit shaped forms

and equipment. Streets have well proportioned widths, with a generous set back from the viaduct to allow street greening whilst open spaces are located to buffer adjacent residential units. This is helped by the central position of the proposed park which is located at the intersection of access routes to form a natural communal space at West Yard together with others that form a link northwards.

- 757. The pedestrianised space at Keetons Road reopens the historical street pattern. Within the Yards the proposed palimpsest also helps to provide a historical connection to the former industrial use. Open spaces at this and other locations are generally successful in providing different use zones (play, event, seating). Here, careful consideration of the species palette will be needed to aid clear and legible routes.
- 758. In comparison to previous iterations the submitted landscape plan omits planting at Shard Walk service access road and the road inter linking the Access Loop near to the entrance on Drummon Road and along the road leading to the basement entrance from Clements Road.
- 759. Given the space available and need for animation the inclusion of water is welcome, and this could be combined with attenuation tanks and SUDs used on adjacent streets. The use of the historic water tower is a feature which could be re purposed as an integral and educational part of water recycling. This still needs to be confirmed as part of more detailed landscape plans and may require a separate condition.
- 760. At roof level a variety of office, private and publically accessible terraces are proposed including play and communal garden space, with biodiverse green and brown roofs elsewhere.
- 761. Following discussion at pre-app a suitable planting schedule has been agreed. However, in order for landscaping to have the required impact and immediate contribution to amenity, planting will require semi-mature specimen sizes. Tree pit specification will require special consideration in order to ensure successful establishment and growth. This should be provided using extensive below ground cellular confinement systems which can be combined with SUDs.
- 762. The design and location of service runs to allow suitable trenching for street tree planting will therefore need to be considered at an early stage. Prior agreement in principle is necessary with highways in order for any planting of street trees to be acceptable and to an adoptable specification.
- 763. Overall, with the exception of the lack of street greening noted above, the proposed landscape layout is well designed and satisfies the aims identified within relevant Southwark open space and London Plan green infrastructure strategies.
- 764. Conditions in relation to protections of trees and provision of landscaping scheme for hard and soft landscaping would be required for any approval.

Human rights implications

- 765. 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.
- 766. This application has the legitimate aim of providing a mixed used redevelopment including new homes, business space, retail and a new school. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for

private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/310-A Application file: 17/AP/4088 Southwark Local Development Framework and Development Plan Documents	160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning		
Report Author	Robin Sedgwick, Senior Planner		
Version	Final		
Dated	28 January 2019		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE 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			28 January 2019

APPENDIX 1

Consultation undertaken

Site notice date: 09/11/2017

Press notice date: 16/11/2017

Case officer site visit date: n/a

Neighbour consultation letters sent: 13/11/2017

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

Civil Aviation Authority
Dept. for Communities & Local Government [Referrals under T&CP (Consultation)(England) Direction 2009 -for London only- as per Annex B of Chief Planner's letter 10 March 2011 - see details on Xdrive]
EDF Energy
Environment Agency
Greater London Authority
Historic England
London Borough of Lewisham
London City Airport
London Fire & Emergency Planning Authority
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)
Sport England
Thames Tideway Tunnel
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

146 Lucey Way London SE16 3UG

148 Lucey Way London SE16 3UG

150 Lucey Way London SE16 3UG

144 Lucey Way London SE16 3UG

Block B Third Floor Unit 6 Tower Bridge Business Complex SE16 4DG

33 Clements Road London SE16 4DW

1 New Concorde Apartments 96 Webster Road SE16 4DF

Block B Third Floor Unit 5 Tower Bridge Business Complex SE16 4DG

138 Lucey Way London SE16 3UG
140 Lucey Way London SE16 3UG
142 Lucey Way London SE16 3UG
160 Lucey Way London SE16 3UG
162 Lucey Way London SE16 3UG
164 Lucey Way London SE16 3UG
158 Lucey Way London SE16 3UG
152 Lucey Way London SE16 3UG
154 Lucey Way London SE16 3UG
156 Lucey Way London SE16 3UG
136 Lucey Way London SE16 3UG
66 Lucey Way London SE16 3UF
68 Lucey Way London SE16 3UF
70 Lucey Way London SE16 3UF
64 Lucey Way London SE16 3UF
6 Lucey Way London SE16 3UF
60 Lucey Way London SE16 3UF
62 Lucey Way London SE16 3UF
130 Lucey Way London SE16 3UG
132 Lucey Way London SE16 3UG
134 Lucey Way London SE16 3UG
128 Lucey Way London SE16 3UG
72 Lucey Way London SE16 3UF
8 Lucey Way London SE16 3UF
126 Lucey Way London SE16 3UG
11 Market Place London SE16 3UQ
12 Market Place London SE16 3UQ
13 Market Place London SE16 3UQ
10 Market Place London SE16 3UQ
196 Lucey Way London SE16 3UG
198 Lucey Way London SE16 3UG
200 Lucey Way London SE16 3UG
18 Market Place London SE16 3UQ
19 Market Place London SE16 3UQ
2 Market Place London SE16 3UQ
17 Market Place London SE16 3UQ
14 Market Place London SE16 3UQ
15 Market Place London SE16 3UQ
16 Market Place London SE16 3UQ
194 Lucey Way London SE16 3UG
174 Lucey Way London SE16 3UG
176 Lucey Way London SE16 3UG
178 Lucey Way London SE16 3UG
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182 Lucey Way London SE16 3UG
184 Lucey Way London SE16 3UG
73 Lucey Way London SE16 3UD
75 Lucey Way London SE16 3UD
79 Lucey Way London SE16 3UD
65 Lucey Way London SE16 3UD
69 Lucey Way London SE16 3UD
89 Lucey Way London SE16 3UD
93 Lucey Way London SE16 3UD
95 Lucey Way London SE16 3UD
87 Lucey Way London SE16 3UD
81 Lucey Way London SE16 3UD
83 Lucey Way London SE16 3UD
85 Lucey Way London SE16 3UD
45 Lucey Way London SE16 3UD
3 Lucey Way London SE16 3UD
57 Lucey Way London SE16 3UD
40 Lucey Way London SE16 3UF
42 Lucey Way London SE16 3UF
44 Lucey Way London SE16 3UF
4 Lucey Way London SE16 3UF
34 Lucey Way London SE16 3UF
36 Lucey Way London SE16 3UF

Block B Third Floor Unit 2 Tower Bridge Business Complex SE16 4DG
Block B Third Floor Unit 3 Tower Bridge Business Complex SE16 4DG
Block B Third Floor Unit 4 Tower Bridge Business Complex SE16 4DG
6 New Concorde Apartments 96 Webster Road SE16 4DF
7 New Concorde Apartments 96 Webster Road SE16 4DF
Nursery Adjacent 25 Marden Square SE16 2HZ
5 New Concorde Apartments 96 Webster Road SE16 4DF
2 New Concorde Apartments 96 Webster Road SE16 4DF
3 New Concorde Apartments 96 Webster Road SE16 4DF
4 New Concorde Apartments 96 Webster Road SE16 4DF
Block B Unit 3 Tower Bridge Business Complex SE16 4DG
11 Bombay Street SE16 3UX
15 Bombay Street SE16 3UX
Unit 1 19 Blue Anchor Lane SE16 3UL
19 Blue Anchor Lane London SE16 3UL
16 Alfred Court 13 Bombay Street SE16 3UX
6 Alfred Court 13 Bombay Street SE16 3UX
7 Alfred Court 13 Bombay Street SE16 3UX
8 Alfred Court 13 Bombay Street SE16 3UX
5 Alfred Court 13 Bombay Street SE16 3UX
2 Alfred Court 13 Bombay Street SE16 3UX
3 Alfred Court 13 Bombay Street SE16 3UX
4 Alfred Court 13 Bombay Street SE16 3UX
13 Alfred Court 13 Bombay Street SE16 3UX
14 Alfred Court 13 Bombay Street SE16 3UX
15 Alfred Court 13 Bombay Street SE16 3UX
12 Alfred Court 13 Bombay Street SE16 3UX
9 Alfred Court 13 Bombay Street SE16 3UX
10 Alfred Court 13 Bombay Street SE16 3UX
11 Alfred Court 13 Bombay Street SE16 3UX
Flat 7 Arch House SE16 3UL
273a Southwark Park Road London SE16 3TP
Flat 1 268 Southwark Park Road SE16 3RN
Flat 2 6a Webster Road SE16 4DS
Flat 3 6a Webster Road SE16 4DS
2-10 Raymouth Road London SE16 2DB
Flat 1 6a Webster Road SE16 4DS
Flat 2 268 Southwark Park Road SE16 3RN
Flat 3 268 Southwark Park Road SE16 3RN
Unit A Prestwood House St Crispins Estate SE16 4BX
Block J Unit 306 Tower Bridge Business Complex SE16 4DG
Block J Unit 315 Tower Bridge Business Complex SE16 4DG
Block J Unit 309 Tower Bridge Business Complex SE16 4DG
Block J Unit 310 Tower Bridge Business Complex SE16 4DG
Block J Unit 311 Tower Bridge Business Complex SE16 4DG
27 Lockwood Square London SE16 2HS
28 Lockwood Square London SE16 2HS
29 Lockwood Square London SE16 2HS
26 Lockwood Square London SE16 2HS
23 Lockwood Square London SE16 2HS
24 Lockwood Square London SE16 2HS
25 Lockwood Square London SE16 2HS
33 Lockwood Square London SE16 2HS
34 Lockwood Square London SE16 2HS
35 Lockwood Square London SE16 2HS
32 Lockwood Square London SE16 2HS
3 Lockwood Square London SE16 2HS
30 Lockwood Square London SE16 2HS
31 Lockwood Square London SE16 2HS
22 Lockwood Square London SE16 2HS
13 Lockwood Square London SE16 2HS
14 Lockwood Square London SE16 2HS
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12 Lockwood Square London SE16 2HS
1 Lockwood Square London SE16 2HS
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11 Lockwood Square London SE16 2HS
2 Lockwood Square London SE16 2HS
20 Lockwood Square London SE16 2HS
21 Lockwood Square London SE16 2HS
19 Lockwood Square London SE16 2HS
16 Lockwood Square London SE16 2HS
17 Lockwood Square London SE16 2HS
18 Lockwood Square London SE16 2HS
281a Southwark Park Road London SE16 3TP

38 Lucey Way London SE16 3UF
 54 Lucey Way London SE16 3UF
 56 Lucey Way London SE16 3UF
 58 Lucey Way London SE16 3UF
 52 Lucey Way London SE16 3UF
 48 Lucey Way London SE16 3UF
 50 Lucey Way London SE16 3UF
 32 Lucey Way London SE16 3UF
 14 Lucey Way London SE16 3UF
 16 Lucey Way London SE16 3UF
 18 Lucey Way London SE16 3UF
 12 Lucey Way London SE16 3UF
 97 Lucey Way London SE16 3UD
 99 Lucey Way London SE16 3UD
 10 Lucey Way London SE16 3UF
 26 Lucey Way London SE16 3UF
 28 Lucey Way London SE16 3UF
 30 Lucey Way London SE16 3UF
 24 Lucey Way London SE16 3UF
 2 Lucey Way London SE16 3UF
 20 Lucey Way London SE16 3UF
 22 Lucey Way London SE16 3UF
 20 Market Place London SE16 3UQ
 47 Rock Grove Way London SE16 3UB
 48 Rock Grove Way London SE16 3UB
 49 Rock Grove Way London SE16 3UB
 46 Rock Grove Way London SE16 3UB
 43 Rock Grove Way London SE16 3UB
 44 Rock Grove Way London SE16 3UB
 45 Rock Grove Way London SE16 3UB
 53 Rock Grove Way London SE16 3UB
 54 Rock Grove Way London SE16 3UB
 55 Rock Grove Way London SE16 3UB
 52 Rock Grove Way London SE16 3UB
 5 Rock Grove Way London SE16 3UB
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 51 Rock Grove Way London SE16 3UB
 42 Rock Grove Way London SE16 3UB
 33 Rock Grove Way London SE16 3UB
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 3 Rock Grove Way London SE16 3UB
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 31 Rock Grove Way London SE16 3UB
 4 Rock Grove Way London SE16 3UB
 40 Rock Grove Way London SE16 3UB
 41 Rock Grove Way London SE16 3UB
 39 Rock Grove Way London SE16 3UB
 36 Rock Grove Way London SE16 3UB
 37 Rock Grove Way London SE16 3UB
 38 Rock Grove Way London SE16 3UB
 9 Blue Anchor Lane London SE16 3UL
 271-273 Southwark Park Road London SE16 3TP
 277-279 Southwark Park Road London SE16 3TP

 53 Blue Anchor Lane London SE16 3UL
 39 Blue Anchor Lane London SE16 3UL
 49 Blue Anchor Lane London SE16 3UL
 51 Blue Anchor Lane London SE16 3UL
 1 Market Place London SE16 3UQ
 253-255 Southwark Park Road London SE16 3TS
 251 Southwark Park Road London SE16 3TS
 4-6 Bombay Street London SE16 3UX
 251a Southwark Park Road London SE16 3TS
 37 Blue Anchor Lane London SE16 3UL
 6 Rock Grove Way London SE16 3UB
 60 Rock Grove Way London SE16 3UB
 7 Rock Grove Way London SE16 3UB

 59 Rock Grove Way London SE16 3UB
 56 Rock Grove Way London SE16 3UB
 57 Rock Grove Way London SE16 3UB
 58 Rock Grove Way London SE16 3UB
 31 Blue Anchor Lane London SE16 3UL
 33 Blue Anchor Lane London SE16 3UL
 15 Blue Anchor Lane London SE16 3UL
 8 Rock Grove Way London SE16 3UB

Block J Ground Floor Tower Bridge Business Complex SE16 4DG
 Flat 9 Easter House SE16 4ES
 Flat 6 Easter House SE16 4ES
 Flat 7 Easter House SE16 4ES
 Flat 8 Easter House SE16 4ES
 5 Old Dairy Apartments 55-57 Blue Anchor Lane SE16 3UL
 Block J Unit 307 Tower Bridge Business Complex SE16 4DG
 Block J Unit 308 Tower Bridge Business Complex SE16 4DG
 4 Old Dairy Apartments 55-57 Blue Anchor Lane SE16 3UL
 1 Old Dairy Apartments 55-57 Blue Anchor Lane SE16 3UL
 2 Old Dairy Apartments 55-57 Blue Anchor Lane SE16 3UL
 3 Old Dairy Apartments 55-57 Blue Anchor Lane SE16 3UL
 Flat 5 Easter House SE16 4ES
 10 Bombay Street London SE16 3YU
 Block B Unit B108 Tower Bridge Business Complex SE16 4DG
 Block J Unit 312 Tower Bridge Business Complex SE16 4DG
 Block B Unit 408 Tower Bridge Business Complex SE16 4DG
 Flat 8 Arch House SE16 3UL
 Flat 9 Arch House SE16 3UL
 Flat 2 Easter House SE16 4ES
 Flat 3 Easter House SE16 4ES
 Flat 4 Easter House SE16 4ES
 Flat 1 Easter House SE16 4ES
 Flat 1 287 Southwark Park Road SE16 3TP
 Block K Unit 214 Tower Bridge Business Complex SE16 4DG
 Block B Unit 406 Tower Bridge Business Complex SE16 4DG
 Block B Unit 407 Tower Bridge Business Complex SE16 4DG
 Block B Unit 102 Tower Bridge Business Complex SE16 4DG
 Block B Unit 405 Tower Bridge Business Complex SE16 4DG
 Block B Unit 402 Tower Bridge Business Complex SE16 4DG
 Block B Unit 403 Tower Bridge Business Complex SE16 4DG
 Block B Unit 404 Tower Bridge Business Complex SE16 4DG
 Block J Unit 300 Tower Bridge Business Complex SE16 4DG
 Ground Floor 21 Blue Anchor Lane SE16 3UL
 Ground Floor 17 Blue Anchor Lane SE16 3UL
 Block B Unit 108 Tower Bridge Business Complex SE16 4DG
 Block B Unit 103 Tower Bridge Business Complex SE16 4DG
 Block B Unit 104 Tower Bridge Business Complex SE16 4DG
 Block B Unit 107 Tower Bridge Business Complex SE16 4DG
 Block B Unit 509 Tower Bridge Business Complex SE16 4DG
 Block K Unit 305 Tower Bridge Business Complex SE16 4DG
 Block K Unit 208 Tower Bridge Business Complex SE16 4DG
 Unit B307 Tower Bridge Business Complex SE16 4DG
 Block K Unit 210 Tower Bridge Business Complex SE16 4DG
 Block J Unit 314 Tower Bridge Business Complex SE16 4DG
 Block J Unit 305 Tower Bridge Business Complex SE16 4DG
 Block J Unit 313 Tower Bridge Business Complex SE16 4DG
 Block B Unit 505 Tower Bridge Business Complex SE16 4DG
 Block B Unit 507 Tower Bridge Business Complex SE16 4DG
 Block B Unit 508 Tower Bridge Business Complex SE16 4DG
 Block B Unit 504 Tower Bridge Business Complex SE16 4DG
 Block B Unit 506 Tower Bridge Business Complex SE16 4DG
 Block B Unit 502 Tower Bridge Business Complex SE16 4DG
 Block B Unit 503 Tower Bridge Business Complex SE16 4DG
 Block B Third Floor Unit 1 Tower Bridge Business Complex SE16 4DG
 Block A Unit 002 Tower Bridge Business Complex SE16 4DG
 Block A Unit 04 Tower Bridge Business Complex SE16 4DG
 Block J Unit 302a Tower Bridge Business Complex SE16 4DG
 Block A Unit 402a Tower Bridge Business Complex SE16 4DG
 298 Southwark Park Road London SE16 2HB
 Block J Unit 304a Tower Bridge Business Complex SE16 4DG
 483a Southwark Park Road London SE16 2JP
 483b Southwark Park Road London SE16 2JP
 483c Southwark Park Road London SE16 2JP
 Ground Floor 257-259 Southwark Park Road SE16 3TP
 Block J Unit 107 Tower Bridge Business Complex SE16 4DG
 Block J Unit 111 Tower Bridge Business Complex SE16 4DG
 Block J Units 109 To 110 Tower Bridge Business Complex SE16 4DU
 St Crispins Church Hall Southwark Park Road SE16 2HU
 12a Market Place London SE16 3UQ
 Second Floor Flat 258 Southwark Park Road SE16 3RN
 Second Floor Flat 260 Southwark Park Road SE16 3RN
 Flat 5 302 Southwark Park Road SE16 2HA
 Flat 2 6 Webster Road SE16 4DS
 Flat 3 6 Webster Road SE16 4DQ
 Flat 4 302 Southwark Park Road SE16 2HA

9 Rock Grove Way London SE16 3UB
13 Blue Anchor Lane London SE16 3UL
252 Southwark Park Road London SE16 3RN
254 Southwark Park Road London SE16 3RN

9 Market Place London SE16 3UQ

35 Market Place London SE16 3UQ

4 Market Place London SE16 3UQ

6 Market Place London SE16 3UQ

266 Southwark Park Road London SE16 3RN

268 Southwark Park Road London SE16 3RN

261-265 Southwark Park Road London SE16 3TP

264 Southwark Park Road London SE16 3RN

256 Southwark Park Road London SE16 3RN

258 Southwark Park Road London SE16 3RN

260 Southwark Park Road London SE16 3RN

34 Market Place London SE16 3UQ

25 Market Place London SE16 3UQ

26 Market Place London SE16 3UQ

27 Market Place London SE16 3UQ

24 Market Place London SE16 3UQ

21 Market Place London SE16 3UQ

22 Market Place London SE16 3UQ

23 Market Place London SE16 3UQ

31 Market Place London SE16 3UQ

32 Market Place London SE16 3UQ

33 Market Place London SE16 3UQ

30 Market Place London SE16 3UQ

28 Market Place London SE16 3UQ

29 Market Place London SE16 3UQ

3 Market Place London SE16 3UQ

20 Rock Grove Way London SE16 3UB

21 Rock Grove Way London SE16 3UB

22 Rock Grove Way London SE16 3UB

2 Rock Grove Way London SE16 3UB

17 Rock Grove Way London SE16 3UB

18 Rock Grove Way London SE16 3UB

19 Rock Grove Way London SE16 3UB

27 Rock Grove Way London SE16 3UB

28 Rock Grove Way London SE16 3UB

29 Rock Grove Way London SE16 3UB

26 Rock Grove Way London SE16 3UB

23 Rock Grove Way London SE16 3UB

24 Rock Grove Way London SE16 3UB

25 Rock Grove Way London SE16 3UB

16 Rock Grove Way London SE16 3UB

287 Southwark Park Road London SE16 3TP

241 Southwark Park Road London SE16 3TS

285 Southwark Park Road London SE16 3TP

267 Southwark Park Road London SE16 3TP

269 Southwark Park Road London SE16 3TP

281 Southwark Park Road London SE16 3TP

13 Rock Grove Way London SE16 3UB

14 Rock Grove Way London SE16 3UB

15 Rock Grove Way London SE16 3UB

12 Rock Grove Way London SE16 3UB

1 Rock Grove Way London SE16 3UB

10 Rock Grove Way London SE16 3UB

11 Rock Grove Way London SE16 3UB

27 Lucey Way London SE16 3UD

92 New Place Square London SE16 2HP

93 New Place Square London SE16 2HP

94 New Place Square London SE16 2HP

91 New Place Square London SE16 2HP

Flat 1 302 Southwark Park Road SE16 2HA

Flat 2 302 Southwark Park Road SE16 2HA

Flat 3 302 Southwark Park Road SE16 2HA

Block A Unit 303 Room 3 Tower Bridge Business Complex SE16 4DG

Block A Unit 303 Room 2 Tower Bridge Business Complex SE16 4DG

Block A Unit 303 Room 1 Tower Bridge Business Complex SE16 4DU

Block A Unit 303 Room 5a Tower Bridge Business Complex SE16 4DG

Block A Unit 303 Room 5 Tower Bridge Business Complex SE16 4DG

Block A Unit 303 Room 7 Tower Bridge Business Complex SE16 4DG

Block A Unit 303 Room 6 Tower Bridge Business Complex SE16 4DG

Flat 3 243 Southwark Park Road SE16 3TS

Flat 4 243 Southwark Park Road SE16 3TS

Flat 5 243 Southwark Park Road SE16 3TS

Flat 2 243 Southwark Park Road SE16 3TS

Block A Unit 303 Room 4 Tower Bridge Business Complex SE16 4DG

Block A Unit 303 Room 6a Tower Bridge Business Complex SE16 4DG

Flat 1 243 Southwark Park Road SE16 3TS

Block A Unit 303 Room 8 Tower Bridge Business Complex SE16 4DG

Block K Unit 405 Tower Bridge Business Complex SE16 4DG

Block J Unit 105 Tower Bridge Business Complex SE16 4DG

Block J Unit 106 Tower Bridge Business Complex SE16 4DG

Block K Unit 404 Tower Bridge Business Complex SE16 4DG

53a Blue Anchor Lane London SE16 3UL

Block K Unit 403 Tower Bridge Business Complex SE16 4DG

Block K Unit 406 Tower Bridge Business Complex SE16 4DG

Ground Floor 243 Southwark Park Road SE16 3TS

Block J Unit 113a Tower Bridge Business Complex SE16 4DG

Block J Units 305 To 311 Tower Bridge Business Complex SE16 4DG

First Floor 243 Southwark Park Road SE16 3TS

16-18 Bombay Street London SE16 3UX

Arches 596 To 602 291 Southwark Park Road SE16 3TP

Units K308 To K313 Tower Bridge Business Complex SE16 4DG

Block N Units 01 And 001 Tower Bridge Business Complex SE16 4DG

Unit B401 Tower Bridge Business Complex SE16 4DG

Unit B501 Tower Bridge Business Complex SE16 4DG

1a New Place Square London SE16 2HW

Store And Premises Near Garage 457 SE16 2JE

Flat 1 6 Webster Road SE16 4DQ

96-96a St Jamess Road London SE16 4RA

Block J Unit 301a Tower Bridge Business Complex SE16 4DG

Block A Unit 402 Tower Bridge Business Complex SE16 4DG

Block A Unit 403 Tower Bridge Business Complex SE16 4DG

Block A Unit 501 Tower Bridge Business Complex SE16 4DG

Block A Unit 401 Tower Bridge Business Complex SE16 4DG

Arch 621w Tower Bridge Business Complex SE16 4DG

Arch 628 Tower Bridge Business Complex SE16 4DG

Block A Unit 302a Tower Bridge Business Complex SE16 4DG

Block G Unit 02 Tower Bridge Business Complex SE16 4DG

Block G Unit 101 Tower Bridge Business Complex SE16 4DG

Block H Unit 2 And Block J Units 1 To 3 Tower Bridge Business Complex SE16 4DG

Block F Units 01 And 101 Tower Bridge Business Complex SE16 4DG

Block A Unit 502 Tower Bridge Business Complex SE16 4DG

Block B Unit 001 Tower Bridge Business Complex SE16 4DG

Block B Units 01 And 02 Tower Bridge Business Complex SE16 4DG

Unit 1 25a Blue Anchor Lane SE16 3UL

Flat 1 86 Webster Road SE16 4DF

Flat 2 86 Webster Road SE16 4DF

Flat 3 86 Webster Road SE16 4DF

Railway Arches 163 To 165 Blue Anchor Lane SE16 3UL

Railway Arch 166 Blue Anchor Lane SE16 3UL

Unit 2 25a Blue Anchor Lane SE16 3UL

Unit 3 25a Blue Anchor Lane SE16 3UL

Flat 4 6 Webster Road SE16 4DS

88 New Place Square London SE16 2HP
89 New Place Square London SE16 2HP
90 New Place Square London SE16 2HP
99 New Place Square London SE16 2HP

101 New Place Square London SE16 2HR
102 New Place Square London SE16 2HR
98 New Place Square London SE16 2HP
95 New Place Square London SE16 2HP
96 New Place Square London SE16 2HP
97 New Place Square London SE16 2HP

87 New Place Square London SE16 2HP
77 New Place Square London SE16 2HP
78 New Place Square London SE16 2HP
79 New Place Square London SE16 2HP
76 New Place Square London SE16 2HP
73 New Place Square London SE16 2HP
74 New Place Square London SE16 2HP
75 New Place Square London SE16 2HP
84 New Place Square London SE16 2HP
85 New Place Square London SE16 2HP
86 New Place Square London SE16 2HP
83 New Place Square London SE16 2HP
80 New Place Square London SE16 2HP
81 New Place Square London SE16 2HP
82 New Place Square London SE16 2HP
122 New Place Square London SE16 2HR
123 New Place Square London SE16 2HR
124 New Place Square London SE16 2HR
121 New Place Square London SE16 2HR
118 New Place Square London SE16 2HR
119 New Place Square London SE16 2HR
120 New Place Square London SE16 2HR
129 New Place Square London SE16 2HR
130 New Place Square London SE16 2HR
131 New Place Square London SE16 2HR
128 New Place Square London SE16 2HR
125 New Place Square London SE16 2HR
126 New Place Square London SE16 2HR
127 New Place Square London SE16 2HR
117 New Place Square London SE16 2HR
107 New Place Square London SE16 2HR
108 New Place Square London SE16 2HR
109 New Place Square London SE16 2HR
106 New Place Square London SE16 2HR
103 New Place Square London SE16 2HR
104 New Place Square London SE16 2HR
105 New Place Square London SE16 2HR
114 New Place Square London SE16 2HR
115 New Place Square London SE16 2HR
116 New Place Square London SE16 2HR
113 New Place Square London SE16 2HR
110 New Place Square London SE16 2HR
111 New Place Square London SE16 2HR
112 New Place Square London SE16 2HR
143 Layard Square London SE16 2JG
144 Layard Square London SE16 2JG
145 Layard Square London SE16 2JG
142 Layard Square London SE16 2JG
139 Layard Square London SE16 2JG
140 Layard Square London SE16 2JG
141 Layard Square London SE16 2JG
150 Layard Square London SE16 2JG
151 Layard Square London SE16 2JG
152 Layard Square London SE16 2JG
149 Layard Square London SE16 2JG
146 Layard Square London SE16 2JG
147 Layard Square London SE16 2JG
148 Layard Square London SE16 2JG
138 Layard Square London SE16 2JG
128 Layard Square London SE16 2JG
129 Layard Square London SE16 2JG
130 Layard Square London SE16 2JG
127 Layard Square London SE16 2JG
124 Layard Square London SE16 2JG
125 Layard Square London SE16 2JG
126 Layard Square London SE16 2JG

Flat 6 243 Southwark Park Road SE16 3TS
Flat 14 257-265 Southwark Park Road SE16 3TP
First Floor Flat 304 Southwark Park Road SE16 2HA
Basement And Ground Floor Flat 304 Southwark Park Road SE16 2HA
Flat 13 257-265 Southwark Park Road SE16 3TP
Flat 10 257-265 Southwark Park Road SE16 3TP
Flat 11 257-265 Southwark Park Road SE16 3TP
Flat 12 257-265 Southwark Park Road SE16 3TP
Site Office Nutmeg Building SE16 4DG
Block B Units 001 01 To 02 03 And 101 To 104 Tower Bridge Business Complex SE16 4DG
Block K Unit 102 Tower Bridge Business Complex SE16 4DG
Lower Ground Floor Nutmeg Building SE16 4DG
Block 3 Cafe Nutmeg Building SE16 4DG
Block 1 Ground Floor Nutmeg Building SE16 4DG
Flat 9 257-265 Southwark Park Road SE16 3TP
Flat 2 267 Southwark Park Road SE16 3TP
Flat 1 257-265 Southwark Park Road SE16 3TP
Flat 1 267 Southwark Park Road SE16 3TP
Flat 6 257-265 Southwark Park Road SE16 3TP
Flat 7 257-265 Southwark Park Road SE16 3TP
Flat 8 257-265 Southwark Park Road SE16 3TP
Flat 5 257-265 Southwark Park Road SE16 3TP
Flat 2 257-265 Southwark Park Road SE16 3TP
Flat 3 257-265 Southwark Park Road SE16 3TP
Flat 4 257-265 Southwark Park Road SE16 3TP
B202 1 Tower Bridge Business Complex SE16 4DG
B202 2 Tower Bridge Business Complex SE16 4DG
B202 3 Tower Bridge Business Complex SE16 4DG
B201 4 Tower Bridge Business Complex SE16 4DG
A301 7 Tower Bridge Business Complex SE16 4DG
B201 2 Tower Bridge Business Complex SE16 4DG
B201 3 Tower Bridge Business Complex SE16 4DG
B202 8 Tower Bridge Business Complex SE16 4DG
B202 9 Tower Bridge Business Complex SE16 4DG
Block E Unit 02b Tower Bridge Business Complex SE16 4DG
B202 7 Tower Bridge Business Complex SE16 4DG
B202 4 Tower Bridge Business Complex SE16 4DG
B202 5 Tower Bridge Business Complex SE16 4DG
B202 6 Tower Bridge Business Complex SE16 4DG
A301 6 Tower Bridge Business Complex SE16 4DG
Living Accommodation The Blue Anchor SE16 3TS
Block J Unit 112 Left Tower Bridge Business Complex SE16 4DG
Block J Unit 112 Right Tower Bridge Business Complex SE16 4DG
Block K Unit 107 Tower Bridge Business Complex SE16 4DG
Block K Unit 104 Tower Bridge Business Complex SE16 4DG
Block K Unit 105 Tower Bridge Business Complex SE16 4DG
Block K Unit 106 Tower Bridge Business Complex SE16 4DG
A301 3 Tower Bridge Business Complex SE16 4DG
A301 4 Tower Bridge Business Complex SE16 4DG
A301 5 Tower Bridge Business Complex SE16 4DG
A301 2 Tower Bridge Business Complex SE16 4DG
Block H Unit 3a Tower Bridge Business Complex SE16 4DG
First Floor Flat 285 Southwark Park Road SE16 3TP
A301 1 Tower Bridge Business Complex SE16 4DG
Flat 17 Flannery Court SE16 2JX
Flat 18 Flannery Court SE16 2JX
Flat 19 Flannery Court SE16 2JX
Flat 16 Flannery Court SE16 2JX
Flat 13 Flannery Court SE16 2JX
Flat 14 Flannery Court SE16 2JX
Flat 15 Flannery Court SE16 2JX
Flat 24 Flannery Court SE16 2JX
Flat 25 Flannery Court SE16 2JX
Flat 26 Flannery Court SE16 2JX
Flat 23 Flannery Court SE16 2JX
Flat 20 Flannery Court SE16 2JX
Flat 21 Flannery Court SE16 2JX
Flat 22 Flannery Court SE16 2JX
Flat 12 Flannery Court SE16 2JX
Flat 2 Flannery Court SE16 2JX
Flat 3 Flannery Court SE16 2JX
Flat 4 Flannery Court SE16 2JX
Flat 1 Flannery Court SE16 2JX
Flat 7 243 Southwark Park Road SE16 3TS
Flat 8 243 Southwark Park Road SE16 3TS
Flat 9 Flannery Court SE16 2JX

135 Layard Square London SE16 2JG	Flat 10 Flannery Court SE16 2JX
136 Layard Square London SE16 2JG	Flat 11 Flannery Court SE16 2JX
137 Layard Square London SE16 2JG	Flat 8 Flannery Court SE16 2JX
134 Layard Square London SE16 2JG	Flat 5 Flannery Court SE16 2JX
131 Layard Square London SE16 2JG	Flat 6 Flannery Court SE16 2JX
132 Layard Square London SE16 2JG	Flat 7 Flannery Court SE16 2JX
133 Layard Square London SE16 2JG	Flat 45 Flannery Court SE16 4DX
63 New Place Square London SE16 2HP	Flat 46 Flannery Court SE16 4DX
64 New Place Square London SE16 2HP	Flat 47 Flannery Court SE16 4DX
65 New Place Square London SE16 2HP	Flat 44 Flannery Court SE16 4DX
62 New Place Square London SE16 2HP	Flat 41 Flannery Court SE16 4DX
59 New Place Square London SE16 2HP	Flat 42 Flannery Court SE16 4DX
60 New Place Square London SE16 2HP	Flat 43 Flannery Court SE16 4DX
61 New Place Square London SE16 2HP	Flat 52 Flannery Court SE16 4DX
70 New Place Square London SE16 2HP	Flat 53 Flannery Court SE16 4DX
71 New Place Square London SE16 2HP	Flat 54 Flannery Court SE16 4DX
72 New Place Square London SE16 2HP	Flat 51 Flannery Court SE16 4DX
69 New Place Square London SE16 2HP	Flat 48 Flannery Court SE16 4DX
66 New Place Square London SE16 2HP	Flat 49 Flannery Court SE16 4DX
67 New Place Square London SE16 2HP	Flat 50 Flannery Court SE16 4DX
68 New Place Square London SE16 2HP	Flat 40 Flannery Court SE16 4DX
58 New Place Square London SE16 2HP	Flat 31 Flannery Court SE16 2JX
306 Southwark Park Road London SE16 2HA	Block J Units 215 To 216 Tower Bridge Business Complex SE16 4DG
156 Layard Square London SE16 2JG	Flat 32 Flannery Court SE16 4RL
153 Layard Square London SE16 2JG	Flat 30 Flannery Court SE16 2JX
154 Layard Square London SE16 2JG	Flat 27 Flannery Court SE16 2JX
155 Layard Square London SE16 2JG	Flat 28 Flannery Court SE16 2JX
300 Southwark Park Road London SE16 2HB	Flat 29 Flannery Court SE16 2JX
100 New Place Square London SE16 2HP	Flat 37 Flannery Court SE16 4RL
57 New Place Square London SE16 2HP	Flat 38 Flannery Court SE16 4RL
Ancient Forresters 282-286 Southwark Park Road SE16 3TP	Flat 39 Flannery Court SE16 4DX
310 Southwark Park Road London SE16 2HA	Flat 36 Flannery Court SE16 4RL
312 Southwark Park Road London SE16 2HA	Flat 33 Flannery Court SE16 4RL
314 Southwark Park Road London SE16 2HA	Flat 34 Flannery Court SE16 4RL
132 New Place Square London SE16 2HR	Flat 35 Flannery Court SE16 4RL
1 Drappers Way London SE16 3UA	153 Marden Square London SE16 2JB
10 Drappers Way London SE16 3UA	154 Marden Square London SE16 2JB
11 Drappers Way London SE16 3UA	155 Marden Square London SE16 2JB
6 Ambrose Street London SE16 3NY	152 Marden Square London SE16 2JB
239 Southwark Park Road London SE16 3TS	149 Marden Square London SE16 2JB
2 Ambrose Street London SE16 3NY	150 Marden Square London SE16 2JB
4 Ambrose Street London SE16 3NY	151 Marden Square London SE16 2JB
16 Drappers Way London SE16 3UA	160 Marden Square London SE16 2JB
17 Drappers Way London SE16 3UA	161 Marden Square London SE16 2JB
18 Drappers Way London SE16 3UA	162 Marden Square London SE16 2JB
15 Drappers Way London SE16 3UA	159 Marden Square London SE16 2JB
12 Drappers Way London SE16 3UA	156 Marden Square London SE16 2JB
13 Drappers Way London SE16 3UA	157 Marden Square London SE16 2JB
14 Drappers Way London SE16 3UA	158 Marden Square London SE16 2JB
8 Bombay Street London SE16 3UX	148 Marden Square London SE16 2JB
55 New Place Square London SE16 2HW	138 Marden Square London SE16 2JB
56 New Place Square London SE16 2HW	139 Marden Square London SE16 2JB
6 New Place Square London SE16 2HW	140 Marden Square London SE16 2JB
54 New Place Square London SE16 2HW	137 Marden Square London SE16 2JB
51 New Place Square London SE16 2HW	134 Marden Square London SE16 2JB
52 New Place Square London SE16 2HW	135 Marden Square London SE16 2JB
53 New Place Square London SE16 2HW	136 Marden Square London SE16 2JB
325 Southwark Park Road London SE16 2JN	145 Marden Square London SE16 2JB
Drummond Christian Centre 121 Drummond Road SE16 2JY	146 Marden Square London SE16 2JB
251b Southwark Park Road London SE16 3TS	147 Marden Square London SE16 2JB
Petrol Filling Station 297-307 Southwark Park Road SE16 2JN	144 Marden Square London SE16 2JB
7 New Place Square London SE16 2HW	141 Marden Square London SE16 2JB
8 New Place Square London SE16 2HW	142 Marden Square London SE16 2JB
9 New Place Square London SE16 2HW	143 Marden Square London SE16 2JB
4 Drappers Way London SE16 3UA	182 Marden Square London SE16 2JD
5 Drappers Way London SE16 3UA	183 Marden Square London SE16 2JD
6 Drappers Way London SE16 3UA	184 Marden Square London SE16 2JD
35 Drappers Way London SE16 3UA	181 Marden Square London SE16 2JD
32 Drappers Way London SE16 3UA	178 Marden Square London SE16 2JD
33 Drappers Way London SE16 3UA	179 Marden Square London SE16 2JD
34 Drappers Way London SE16 3UA	180 Marden Square London SE16 2JD
15 Lucey Way London SE16 3UD	12 Layard Square London SE16 2JE
7 Drappers Way London SE16 3UA	13 Layard Square London SE16 2JE
8 Drappers Way London SE16 3UA	14 Layard Square London SE16 2JE

43 Webster Road London SE16 4DR	74 Layard Square London SE16 2JF
45 Webster Road London SE16 4DR	75 Layard Square London SE16 2JF
47 Webster Road London SE16 4DR	76 Layard Square London SE16 2JF
65 Webster Road London SE16 4DR	73 Layard Square London SE16 2JF
67 Webster Road London SE16 4DR	70 Layard Square London SE16 2JF
69 Webster Road London SE16 4DR	71 Layard Square London SE16 2JF
63 Webster Road London SE16 4DR	72 Layard Square London SE16 2JF
57 Webster Road London SE16 4DR	81 Layard Square London SE16 2JF
59 Webster Road London SE16 4DR	82 Layard Square London SE16 2JF
61 Webster Road London SE16 4DR	83 Layard Square London SE16 2JF
41 Webster Road London SE16 4DR	80 Layard Square London SE16 2JF
37 Collett Road London SE16 4DJ	77 Layard Square London SE16 2JF
39 Collett Road London SE16 4DJ	78 Layard Square London SE16 2JF
41 Collett Road London SE16 4DJ	79 Layard Square London SE16 2JF
35 Collett Road London SE16 4DJ	69 Layard Square London SE16 2JF
29 Collett Road London SE16 4DJ	105 Layard Square London SE16 2JF
31 Collett Road London SE16 4DJ	106 Layard Square London SE16 2JF
33 Collett Road London SE16 4DJ	107 Layard Square London SE16 2JF
72 Storks Road London SE16 4DL	104 Layard Square London SE16 2JF
37 Webster Road London SE16 4DR	101 Layard Square London SE16 2JF
39 Webster Road London SE16 4DR	102 Layard Square London SE16 2JF
70 Storks Road London SE16 4DL	103 Layard Square London SE16 2JF
43 Collett Road London SE16 4DJ	66 Layard Square London SE16 2JF
45 Collett Road London SE16 4DJ	67 Layard Square London SE16 2JF
47 Collett Road London SE16 4DJ	68 Layard Square London SE16 2JF
29b New Place Square London SE16 2HW	65 Layard Square London SE16 2JF
29c New Place Square London SE16 2HW	108 Layard Square London SE16 2JF
First Floor And Second Floor Flat 94 Webster Road SE16 4DF	109 Layard Square London SE16 2JF
29a New Place Square London SE16 2HW	110 Layard Square London SE16 2JF
Millpond Old Peoples Home Southwark Park Road SE16 2JN	114 Layard Square London SE16 2JG
268a Southwark Park Road London SE16 4AT	115 Layard Square London SE16 2JG
308 Southwark Park Road London SE16 2HA	116 Layard Square London SE16 2JG
First Floor Flat 258 Southwark Park Road SE16 3RN	113 Layard Square London SE16 2JG
Ground Floor Flat 35 Blue Anchor Lane SE16 3UL	99 Layard Square London SE16 2JF
Sheltered Unit 55 Rock Grove Way SE16 3UB	111 Layard Square London SE16 2JG
First Floor Flat 35 Blue Anchor Lane SE16 3UL	112 Layard Square London SE16 2JG
First Floor Flat 271-273 Southwark Park Road SE16 3TP	121 Layard Square London SE16 2JG
First Floor Flat 277-279 Southwark Park Road SE16 3TP	122 Layard Square London SE16 2JG
First Floor Flat 260 Southwark Park Road SE16 3RN	123 Layard Square London SE16 2JG
Flat 8 Wesley Court SE16 4DT	120 Layard Square London SE16 2JG
Flat 5 92 Storks Road SE16 4DP	117 Layard Square London SE16 2JG
Unit 9 Discovery Business Park SE16 4RA	118 Layard Square London SE16 2JG
Flat 4 92 Storks Road SE16 4DP	119 Layard Square London SE16 2JG
Flat 1 92 Storks Road SE16 4DP	98 Layard Square London SE16 2JF
Flat 2 92 Storks Road SE16 4DP	88 Layard Square London SE16 2JF
Flat 3 92 Storks Road SE16 4DP	89 Layard Square London SE16 2JF
Flat 5 Wesley Court SE16 4DT	90 Layard Square London SE16 2JF
Flat 6 Wesley Court SE16 4DT	87 Layard Square London SE16 2JF
Flat 7 Wesley Court SE16 4DT	84 Layard Square London SE16 2JF
Flat 4 Wesley Court SE16 4DT	85 Layard Square London SE16 2JF
Flat 1 Wesley Court SE16 4DT	86 Layard Square London SE16 2JF
Flat 2 Wesley Court SE16 4DT	95 Layard Square London SE16 2JF
Flat 3 Wesley Court SE16 4DT	96 Layard Square London SE16 2JF
17 Clements Road London SE16 4DW	97 Layard Square London SE16 2JF
19 Clements Road London SE16 4DW	94 Layard Square London SE16 2JF
21 Clements Road London SE16 4DW	91 Layard Square London SE16 2JF
15 Clements Road London SE16 4DW	92 Layard Square London SE16 2JF
5 Webster Road London SE16 4DQ	93 Layard Square London SE16 2JF
7 Webster Road London SE16 4DQ	33 Layard Square London SE16 2JE
13 Clements Road London SE16 4DW	34 Layard Square London SE16 2JE
31 Clements Road London SE16 4DW	35 Layard Square London SE16 2JE
John Dixon Clinic Drummond Road SE16 4BU	32 Layard Square London SE16 2JE
29 Clements Road London SE16 4DW	3 Layard Square London SE16 2JE
23 Clements Road London SE16 4DW	30 Layard Square London SE16 2JE
25 Clements Road London SE16 4DW	31 Layard Square London SE16 2JE
27 Clements Road London SE16 4DW	4 Layard Square London SE16 2JE
3 Webster Road London SE16 4DQ	40 Layard Square London SE16 2JE
23 John Mckenna Walk London SE16 4SW	41 Layard Square London SE16 2JE
25 John Mckenna Walk London SE16 4SW	39 Layard Square London SE16 2JE
3 John Mckenna Walk London SE16 4SW	36 Layard Square London SE16 2JE
21 John Mckenna Walk London SE16 4SW	37 Layard Square London SE16 2JE
15 John Mckenna Walk London SE16 4SW	38 Layard Square London SE16 2JE
17 John Mckenna Walk London SE16 4SW	29 Layard Square London SE16 2JE
19 John Mckenna Walk London SE16 4SW	2 Layard Square London SE16 2JE
93 St Jamess Road London SE16 4QS	20 Layard Square London SE16 2JE
95 St Jamess Road London SE16 4QS	21 Layard Square London SE16 2JE

1 Webster Road London SE16 4DQ	19 Layard Square London SE16 2JE
89 St Jamess Road London SE16 4QS	16 Layard Square London SE16 2JE
5 John Mckenna Walk London SE16 4SW	17 Layard Square London SE16 2JE
7 John Mckenna Walk London SE16 4SW	18 Layard Square London SE16 2JE
9 John Mckenna Walk London SE16 4SW	26 Layard Square London SE16 2JE
South Bermondsey Arches 654-656 St Jamess Road SE16 4RA	27 Layard Square London SE16 2JE
91 St Jamess Road London SE16 4QS	28 Layard Square London SE16 2JE
Flat 17 Salisbury Court SE16 4DH	25 Layard Square London SE16 2JE
Flat 14 Salisbury Court SE16 4DH	22 Layard Square London SE16 2JE
Flat 15 Salisbury Court SE16 4DH	23 Layard Square London SE16 2JE
Flat 16 Salisbury Court SE16 4DH	24 Layard Square London SE16 2JE
23 Collett Road London SE16 4DJ	6 Layard Square London SE16 2JE
25 Collett Road London SE16 4DJ	60 Layard Square London SE16 2JE
27 Collett Road London SE16 4DJ	61 Layard Square London SE16 2JE
21 Collett Road London SE16 4DJ	59 Layard Square London SE16 2JE
82 Storks Road London SE16 4DP	56 Layard Square London SE16 2JE
St James Tavern 72 St Jamess Road SE16 4QZ	57 Layard Square London SE16 2JE
Flat 12 Salisbury Court SE16 4DH	58 Layard Square London SE16 2JE
Flat 2 Salisbury Court SE16 4DH	8 Layard Square London SE16 2JE
Flat 3 Salisbury Court SE16 4DH	9 Layard Square London SE16 2JE
Flat 4 Salisbury Court SE16 4DH	100 Layard Square London SE16 2JF
Flat 1 Salisbury Court SE16 4DH	7 Layard Square London SE16 2JE
99 St Jamess Road	62 Layard Square London SE16 2JE
101 St Jamess Road London SE16 4RA	63 Layard Square London SE16 2JE
103 St Jamess Road London SE16 4RA	64 Layard Square London SE16 2JE
Flat 9 Salisbury Court SE16 4DH	55 Layard Square London SE16 2JE
Flat 10 Salisbury Court SE16 4DH	46 Layard Square London SE16 2JE
Flat 11 Salisbury Court SE16 4DH	47 Layard Square London SE16 2JE
Flat 8 Salisbury Court SE16 4DH	48 Layard Square London SE16 2JE
Flat 5 Salisbury Court SE16 4DH	45 Layard Square London SE16 2JE
Flat 6 Salisbury Court SE16 4DH	42 Layard Square London SE16 2JE
Flat 7 Salisbury Court SE16 4DH	43 Layard Square London SE16 2JE
Railway Arch 5 Almond Road SE16 3LR	44 Layard Square London SE16 2JE
Arches 619 To 619w Tower Bridge Business Complex SE16 4DG	52 Layard Square London SE16 2JE
Arches 620 To 621 Tower Bridge Business Complex SE16 4DG	53 Layard Square London SE16 2JE
Arch 622 Tower Bridge Business Complex SE16 4EF	54 Layard Square London SE16 2JE
Arch 616w Tower Bridge Business Complex SE16 4DG	51 Layard Square London SE16 2JE
Block J Unit 415 Tower Bridge Business Complex SE16 4DU	49 Layard Square London SE16 2JE
Arch 602w Tower Bridge Business Complex SE16 4DG	5 Layard Square London SE16 2JE
Arches 610w To 611w Tower Bridge Business Complex SE16 4DG	50 Layard Square London SE16 2JE
Arch 631w Tower Bridge Business Complex SE16 4DG	64 Marden Square London SE16 2JA
Arch 632w Tower Bridge Business Complex SE16 4DG	107 Lockwood Square London SE16 2HX
Arch 637w Tower Bridge Business Complex SE16 4DG	108 Lockwood Square London SE16 2HX
Arch 629w Tower Bridge Business Complex SE16 4DG	109 Lockwood Square London SE16 2HX
Arch 623 Tower Bridge Business Complex SE16 4DG	106 Lockwood Square London SE16 2HX
Arch 624w Tower Bridge Business Complex SE16 4DG	103 Lockwood Square London SE16 2HX
Arch 626w Tower Bridge Business Complex SE16 4DG	104 Lockwood Square London SE16 2HX
Block J Unit 414 Tower Bridge Business Complex SE16 4DG	105 Lockwood Square London SE16 2HX
Block K Unit 401 Tower Bridge Business Complex SE16 4DG	114 Lockwood Square London SE16 2HX
Block J Units 402 And 403 Tower Bridge Business Complex SE16 4DG	115 Lockwood Square London SE16 2HX
Block K Unit 402 Tower Bridge Business Complex SE16 4DG	116 Lockwood Square London SE16 2HX
Block J Unit 401 Tower Bridge Business Complex SE16 4DG	113 Lockwood Square London SE16 2HX
Block J Unit 304 Tower Bridge Business Complex SE16 4DG	110 Lockwood Square London SE16 2HX
Block K Units 304 And 305 Tower Bridge Business Complex SE16 4DG	111 Lockwood Square London SE16 2HX
Block K Unit 307 Tower Bridge Business Complex SE16 4DG	112 Lockwood Square London SE16 2HX
Block J Unit 410 Tower Bridge Business Complex SE16 4DG	99 Lockwood Square London SE16 2HT
Block J Units 411 And 412 Tower Bridge Business Complex SE16 4DG	89 Lockwood Square London SE16 2HT
Block J Unit 413 Tower Bridge Business Complex SE16 4DG	90 Lockwood Square London SE16 2HT
Block J Unit 409 Tower Bridge Business Complex SE16 4DG	91 Lockwood Square London SE16 2HT
Block J Unit 404 Tower Bridge Business Complex SE16 4DG	88 Lockwood Square London SE16 2HT

Block J Unit 406 Tower Bridge Business Complex SE16 4DG	85 Lockwood Square London SE16 2HT
Block J Units 407 And 408 Tower Bridge Business Complex SE16 4DG	86 Lockwood Square London SE16 2HT
Tower Bridge Business Complex Clements Road SE16 4DG	87 Lockwood Square London SE16 2HT
Rear Of Petrol Filling Station SE16 2JN	96 Lockwood Square London SE16 2HT
273 Southwark Park Road London SE16 3TP	97 Lockwood Square London SE16 2HT
275 Southwark Park Road London SE16 3TP	98 Lockwood Square London SE16 2HT
275a Southwark Park Road London SE16 3TP	95 Lockwood Square London SE16 2HT
Ground Floor Front 270 Southwark Park Road SE16 3RN	92 Lockwood Square London SE16 2HT
Arches 651 To 652 Tower Bridge Business Complex SE16 4DG	93 Lockwood Square London SE16 2HT
Arch 653 Tower Bridge Business Complex SE16 4DG	94 Lockwood Square London SE16 2HT
Arch 650 Tower Bridge Business Complex SE16 4DG	136 Lockwood Square London SE16 2HX
Arches 638 To 641 Tower Bridge Business Complex SE16 4DG	137 Lockwood Square London SE16 2HX
Arch 645w Tower Bridge Business Complex SE16 4DG	138 Lockwood Square London SE16 2HX
Arches 648 To 649 Tower Bridge Business Complex SE16 4DG	135 Lockwood Square London SE16 2HX
Estate Store 57 New Place Square SE16 2HP	132 Lockwood Square London SE16 2HX
Estate Store Adjacent Garage 73 SE16 2HW	133 Lockwood Square London SE16 2HX
Estate Store Adjacent Garage SE16 2HW	134 Lockwood Square London SE16 2HX
Railway Arch 16 Linsey Street SE16 3YD	143 Lockwood Square London SE16 2HX
Estate Store Lockwood Square SE16 2HS	144 Lockwood Square London SE16 2HX
Rouel Tenants Association Market Place SE16 3UQ	145 Lockwood Square London SE16 2HX
Block K Unit 03 Tower Bridge Business Complex SE16 4DG	142 Lockwood Square London SE16 2HX
Block A Unit 04 And 002 Tower Bridge Business Complex SE16 4DG	139 Lockwood Square London SE16 2HX
Block E Unit 04 Tower Bridge Business Complex SE16 4DG	140 Lockwood Square London SE16 2HX
Block H Unit 3 Tower Bridge Business Complex SE16 4DG	141 Lockwood Square London SE16 2HX
Block A Unit 03 Tower Bridge Business Complex SE16 4DG	131 Lockwood Square London SE16 2HX
Block C Unit 03 Tower Bridge Business Complex SE16 4DG	121 Lockwood Square London SE16 2HX
Block E Unit 03 Tower Bridge Business Complex SE16 4DG	122 Lockwood Square London SE16 2HX
Block K Unit 101 Tower Bridge Business Complex SE16 4DU	123 Lockwood Square London SE16 2HX
Block J Unit 102 Tower Bridge Business Complex SE16 4DG	120 Lockwood Square London SE16 2HX
Block J Unit 103 Tower Bridge Business Complex SE16 4DG	117 Lockwood Square London SE16 2HX
Block J Unit 101 Tower Bridge Business Complex SE16 4DG	118 Lockwood Square London SE16 2HX
Block H Unit 04 Tower Bridge Business Complex SE16 4DG	119 Lockwood Square London SE16 2HX
Block A Unit 05 And 001 Tower Bridge Business Complex SE16 4DG	128 Lockwood Square London SE16 2HX
Block H Unit 05 Tower Bridge Business Complex SE16 4DG	129 Lockwood Square London SE16 2HX
Block K Unit 002 Tower Bridge Business Complex SE16 4DG	130 Lockwood Square London SE16 2HX
Block C Units 01 And 02 Tower Bridge Business Complex SE16 4DG	127 Lockwood Square London SE16 2HX
Block D Units 01 And 02 Tower Bridge Business Complex SE16 4DU	124 Lockwood Square London SE16 2HX
Block G Unit 01 Tower Bridge Business Complex SE16 4DG	125 Lockwood Square London SE16 2HX
Block C And D Unit 001 Tower Bridge Business Complex SE16 4DG	126 Lockwood Square London SE16 2HX
266 Ambrose Street London SE16 3NY	6 Lockwood Square London SE16 2HS
6a Bombay Street London SE16 3UX	7 Lockwood Square London SE16 2HS
Block A Unit 01 Tower Bridge Business Complex SE16 4DG	8 Lockwood Square London SE16 2HS
Block C And D Excluding Ground Block D Units 01 To 02 Tower Bridge Business Complex SE16 4DG	52 Lockwood Square London SE16 2HS
Block A Unit 02 Tower Bridge Business Complex SE16 4DG	5 Lockwood Square London SE16 2HS
Block E Unit 02a Tower Bridge Business Complex SE16 4DG	50 Lockwood Square London SE16 2HS
Block A First Floor Tower Bridge Business Complex SE16 4DG	51 Lockwood Square London SE16 2HS
Block K Units 01 And 02 Tower Bridge Business Complex SE16 4DG	53 Lockwood Square London SE16 2HT

Block K Unit 001 Tower Bridge Business Complex SE16 4DG	54 Lockwood Square London SE16 2HT
Block L Unit 01 Tower Bridge Business Complex SE16 4DG	55 Lockwood Square London SE16 2HT
Block J Unit 209 Tower Bridge Business Complex SE16 4DG	102 Lockwood Square London SE16 2HT
Block J Unit 210 Tower Bridge Business Complex SE16 4DG	9 Lockwood Square London SE16 2HS
Block J Units 211 And 212 Tower Bridge Business Complex SE16 4DG	100 Lockwood Square London SE16 2HT
Block J Unit 208 Tower Bridge Business Complex SE16 4DG	101 Lockwood Square London SE16 2HT
Block J Unit 204 Tower Bridge Business Complex SE16 4DG	49 Lockwood Square London SE16 2HS
Block J Units 205 And 206 Tower Bridge Business Complex SE16 4DG	4 Lockwood Square London SE16 2HS
Block J Unit 207 Tower Bridge Business Complex SE16 4DG	40 Lockwood Square London SE16 2HS
Block A Unit 302 Tower Bridge Business Complex SE16 4DG	41 Lockwood Square London SE16 2HS
Block J Unit 302 Tower Bridge Business Complex SE16 4DG	39 Lockwood Square London SE16 2HS
Block J Unit 303 Tower Bridge Business Complex SE16 4DU	36 Lockwood Square London SE16 2HS
Block K Units 301 And 302 Tower Bridge Business Complex SE16 4DG	37 Lockwood Square London SE16 2HS
Block J Unit 213 Tower Bridge Business Complex SE16 4DG	38 Lockwood Square London SE16 2HS
Block J Unit 214 Tower Bridge Business Complex SE16 4DU	46 Lockwood Square London SE16 2HS
Block J Unit 301 Tower Bridge Business Complex SE16 4DG	47 Lockwood Square London SE16 2HS
Block J Unit 203 Tower Bridge Business Complex SE16 4DU	48 Lockwood Square London SE16 2HS
Block J Unit 108 Tower Bridge Business Complex SE16 4DG	45 Lockwood Square London SE16 2HS
Block J Unit 113 Tower Bridge Business Complex SE16 4DG	42 Lockwood Square London SE16 2HS
Block J Unit 114 Tower Bridge Business Complex SE16 4DU	43 Lockwood Square London SE16 2HS
Block J Units 107 And 109 To 111 Tower Bridge Business Complex SE16 4DG	44 Lockwood Square London SE16 2HS
Block K Unit 103 Tower Bridge Business Complex SE16 4DG	75 Lockwood Square London SE16 2HT
Block J Unit 104 Tower Bridge Business Complex SE16 4DG	76 Lockwood Square London SE16 2HT
Block B Unit 105 To 106 Tower Bridge Business Complex SE16 4DG	77 Lockwood Square London SE16 2HT
Block K Unit 201 Tower Bridge Business Complex SE16 4DG	74 Lockwood Square London SE16 2HT
Block J Unit 202 Tower Bridge Business Complex SE16 4DG	71 Lockwood Square London SE16 2HT
Block A Unit 203 Tower Bridge Business Complex SE16 4DG	72 Lockwood Square London SE16 2HT
Block J Unit 201 Tower Bridge Business Complex SE16 4DU	73 Lockwood Square London SE16 2HT
Block J Unit 115 Tower Bridge Business Complex SE16 4DU	82 Lockwood Square London SE16 2HT
Block J Unit 200 Tower Bridge Business Complex SE16 4DU	83 Lockwood Square London SE16 2HT
Block A Units 201 And 202 Tower Bridge Business Complex SE16 4DG	84 Lockwood Square London SE16 2HT
13 John McKenna Walk London SE16 4SW	81 Lockwood Square London SE16 2HT
90 Storks Road London SE16 4DP	78 Lockwood Square London SE16 2HT
11 Webster Road London SE16 4DQ	79 Lockwood Square London SE16 2HT
13 Webster Road London SE16 4DQ	80 Lockwood Square London SE16 2HT
88 Storks Road London SE16 4DP	70 Lockwood Square London SE16 2HT
First & Second Floor Flat 94 Webster Road SE16 4DF	60 Lockwood Square London SE16 2HT
84 Storks Road London SE16 4DP	61 Lockwood Square London SE16 2HT
86 Storks Road London SE16 4DP	62 Lockwood Square London SE16 2HT
23 Webster Road London SE16 4DQ	59 Lockwood Square London SE16 2HT
25 Webster Road London SE16 4DQ	56 Lockwood Square London SE16 2HT
27 Webster Road London SE16 4DQ	57 Lockwood Square London SE16 2HT
21 Webster Road London SE16 4DQ	58 Lockwood Square London SE16 2HT
15 Webster Road London SE16 4DQ	67 Lockwood Square London SE16 2HT
17 Webster Road London SE16 4DQ	68 Lockwood Square London SE16 2HT
19 Webster Road London SE16 4DQ	69 Lockwood Square London SE16 2HT
92 Webster Road London SE16 4DF	66 Lockwood Square London SE16 2HT

36 Collett Road London SE16 4DD	63 Lockwood Square London SE16 2HT
4 Collett Road London SE16 4DD	64 Lockwood Square London SE16 2HT
6 Collett Road London SE16 4DD	65 Lockwood Square London SE16 2HT
34 Collett Road London SE16 4DD	146 Lockwood Square London SE16 2HX
28 Collett Road London SE16 4DD	41 Marden Square London SE16 2HZ
30 Collett Road London SE16 4DD	42 Marden Square London SE16 2HZ
32 Collett Road London SE16 4DD	43 Marden Square London SE16 2HZ
81 Storks Road London SE16 4DE	40 Marden Square London SE16 2HZ
88 Webster Road London SE16 4DF	38 Marden Square London SE16 2HZ
90 Webster Road London SE16 4DF	39 Marden Square London SE16 2HZ
79 Storks Road London SE16 4DE	4 Marden Square London SE16 2HZ
8 Collett Road London SE16 4DD	6 Marden Square London SE16 2HZ
75 Storks Road London SE16 4DE	7 Marden Square London SE16 2HZ
77 Storks Road London SE16 4DE	8 Marden Square London SE16 2HZ
46 Tranton Road London SE16 4SB	5 Marden Square London SE16 2HZ
48 Tranton Road London SE16 4SB	44 Marden Square London SE16 2HZ
50 Tranton Road London SE16 4SB	45 Marden Square London SE16 2HZ
44 Tranton Road London SE16 4SB	46 Marden Square London SE16 2HZ
38 Tranton Road London SE16 4SB	37 Marden Square London SE16 2HZ
40 Tranton Road London SE16 4SB	28 Marden Square London SE16 2HZ
42 Tranton Road London SE16 4SB	29 Marden Square London SE16 2HZ
23 Tranton Road London SE16 4SE	3 Marden Square London SE16 2HZ
25 Tranton Road London SE16 4SE	27 Marden Square London SE16 2HZ
27 Tranton Road London SE16 4SE	24 Marden Square London SE16 2HZ
21 Tranton Road London SE16 4SE	25 Marden Square London SE16 2HZ
52 Tranton Road London SE16 4SB	26 Marden Square London SE16 2HZ
54 Tranton Road London SE16 4SB	34 Marden Square London SE16 2HZ
19 Tranton Road London SE16 4SE	35 Marden Square London SE16 2HZ
36 Tranton Road London SE16 4SB	36 Marden Square London SE16 2HZ
16 Tranton Road London SE16 4SB	33 Marden Square London SE16 2HZ
18 Tranton Road London SE16 4SB	30 Marden Square London SE16 2HZ
20 Tranton Road London SE16 4SB	31 Marden Square London SE16 2HZ
14 Tranton Road London SE16 4SB	32 Marden Square London SE16 2HZ
29 Webster Road London SE16 4DQ	54 Marden Square London SE16 2JA
31 Webster Road London SE16 4DQ	55 Marden Square London SE16 2JA
9 Webster Road London SE16 4DQ	56 Marden Square London SE16 2JA
30 Tranton Road London SE16 4SB	53 Marden Square London SE16 2JA
32 Tranton Road London SE16 4SB	50 Marden Square London SE16 2JA
34 Tranton Road London SE16 4SB	51 Marden Square London SE16 2JA
28 Tranton Road London SE16 4SB	52 Marden Square London SE16 2JA
22 Tranton Road London SE16 4SB	61 Marden Square London SE16 2JA
24 Tranton Road London SE16 4SB	62 Marden Square London SE16 2JA
26 Tranton Road London SE16 4SB	63 Marden Square London SE16 2JA
20 Webster Road London SE16 4DF	60 Marden Square London SE16 2JA
22 Webster Road London SE16 4DF	57 Marden Square London SE16 2JA
24 Webster Road London SE16 4DF	58 Marden Square London SE16 2JA
18 Webster Road London SE16 4DF	59 Marden Square London SE16 2JA
Unit 2 23a Blue Anchor Lane SE16 3UL	49 Marden Square London SE16 2JA
Unit 3 23a Blue Anchor Lane SE16 3UL	103 Marden Square London SE16 2JA
16 Webster Road London SE16 4DF	104 Marden Square London SE16 2JA
34 Webster Road London SE16 4DF	105 Marden Square London SE16 2JA
97 St Jamess Road London SE16 4RA	102 Marden Square London SE16 2JA
1 Perryn Road London SE16 4DA	9 Marden Square London SE16 2HZ
32 Webster Road London SE16 4DF	100 Marden Square London SE16 2JA
26 Webster Road London SE16 4DF	101 Marden Square London SE16 2JA
28 Webster Road London SE16 4DF	110 Marden Square London SE16 2JA
30 Webster Road London SE16 4DF	47 Marden Square London SE16 2JA
Unit 1 23a Blue Anchor Lane SE16 3UL	48 Marden Square London SE16 2JA
13a Market Place London SE16 3UQ	109 Marden Square London SE16 2JA
289 Southwark Park Road London SE16 3TP	106 Marden Square London SE16 2JA
5 Market Place London SE16 3UQ	107 Marden Square London SE16 2JA
25 Blue Anchor Lane London SE16 3UL	108 Marden Square London SE16 2JA
262 Southwark Park Road London SE16 3RN	166 Lockwood Square London SE16 2HY
1 Bombay Street London SE16 3UX	167 Lockwood Square London SE16 2HY
8 Market Place London SE16 3UQ	168 Lockwood Square London SE16 2HY
2-14 Bombay Street London SE16 3UX	165 Lockwood Square London SE16 2HY
23 Blue Anchor Lane London SE16 3UL	162 Lockwood Square London SE16 2HY
3-7 Bombay Street London SE16 3UX	163 Lockwood Square London SE16 2HY
283 Southwark Park Road London SE16 3TP	164 Lockwood Square London SE16 2HY
289a Southwark Park Road London SE16 3TP	173 Lockwood Square London SE16 2HY
Blue Anchor Library Market Place SE16 3UQ	174 Lockwood Square London SE16 2HY
10 Collett Road London SE16 4DD	175 Lockwood Square London SE16 2HY
12 Collett Road London SE16 4DD	172 Lockwood Square London SE16 2HY
14 Collett Road London SE16 4DD	169 Lockwood Square London SE16 2HY
40 Keetons Road London SE16 4DB	170 Lockwood Square London SE16 2HY
34 Keetons Road London SE16 4DB	171 Lockwood Square London SE16 2HY
36 Keetons Road London SE16 4DB	161 Lockwood Square London SE16 2HY
38 Keetons Road London SE16 4DB	151 Lockwood Square London SE16 2HY

22 Collett Road London SE16 4DD
 24 Collett Road London SE16 4DD
 26 Collett Road London SE16 4DD
 20 Collett Road London SE16 4DD
 16 Collett Road London SE16 4DD
 18 Collett Road London SE16 4DD
 2 Collett Road London SE16 4DD
 32 Keetons Road London SE16 4DB
 14 Perryn Road London SE16 4DA
 2 Perryn Road London SE16 4DA
 3 Perryn Road London SE16 4DA
 13 Perryn Road London SE16 4DA
 10 Perryn Road London SE16 4DA
 11 Perryn Road London SE16 4DA
 12 Perryn Road London SE16 4DA
 8 Perryn Road London SE16 4DA
 9 Perryn Road London SE16 4DA
 30 Keetons Road London SE16 4DB
 7 Perryn Road London SE16 4DA
 4 Perryn Road London SE16 4DA
 5 Perryn Road London SE16 4DA
 6 Perryn Road London SE16 4DA
 29 Tranton Road London SE16 4SE
 20 John Roll Way London SE16 4SP
 21 John Roll Way London SE16 4SP
 22 John Roll Way London SE16 4SP
 19 John Roll Way London SE16 4SP
 16 John Roll Way London SE16 4SP
 17 John Roll Way London SE16 4SP
 18 John Roll Way London SE16 4SP
 27 John Roll Way London SE16 4SP
 28 John Roll Way London SE16 4SP
 29 John Roll Way London SE16 4SP
 26 John Roll Way London SE16 4SP
 23 John Roll Way London SE16 4SP
 24 John Roll Way London SE16 4SP
 25 John Roll Way London SE16 4SP
 15 John Roll Way London SE16 4SP
 Flat 5 Chalfont House St Crispins Estate SE16 4BZ
 Flat 6 Chalfont House St Crispins Estate SE16 4BZ
 Flat 7 Chalfont House St Crispins Estate SE16 4BZ
 Flat 4 Chalfont House St Crispins Estate SE16 4BZ
 Flat 2 Chalfont House St Crispins Estate SE16 4BZ
 Flat 20 Chalfont House St Crispins Estate SE16 4BZ
 Flat 3 Chalfont House St Crispins Estate SE16 4BZ
 12 John Roll Way London SE16 4SP
 13 John Roll Way London SE16 4SP
 14 John Roll Way London SE16 4SP
 11 John Roll Way London SE16 4SP
 Flat 8 Chalfont House St Crispins Estate SE16 4BZ
 Flat 9 Chalfont House St Crispins Estate SE16 4BZ
 1 John Roll Way London SE16 4SP
 57 John Roll Way London SE16 4SP
 59 John Roll Way London SE16 4SP
 61 John Roll Way London SE16 4SP
 55 John Roll Way London SE16 4SP
 5 John Roll Way London SE16 4SP
 51 John Roll Way London SE16 4SP
 53 John Roll Way London SE16 4SP
 9 John Roll Way London SE16 4SP
 1 John Mckenna Walk London SE16 4SW
 11 John Mckenna Walk London SE16 4SW
 7 John Roll Way London SE16 4SP
 63 John Roll Way London SE16 4SP
 65 John Roll Way London SE16 4SP
 67 John Roll Way London SE16 4SP
 49 John Roll Way London SE16 4SP
 Keetons Sheltered Unit 33 John Roll Way SE16 4SP
 34 John Roll Way London SE16 4SP
 35 John Roll Way London SE16 4SP
 32 John Roll Way London SE16 4SP
 3 John Roll Way London SE16 4SP
 30 John Roll Way London SE16 4SP
 31 John Roll Way London SE16 4SP
 43 John Roll Way London SE16 4SP
 45 John Roll Way London SE16 4SP
 47 John Roll Way London SE16 4SP
 41 John Roll Way London SE16 4SP

152 Lockwood Square London SE16 2HY
 153 Lockwood Square London SE16 2HY
 150 Lockwood Square London SE16 2HY
 147 Lockwood Square London SE16 2HX
 148 Lockwood Square London SE16 2HX
 149 Lockwood Square London SE16 2HY
 158 Lockwood Square London SE16 2HY
 159 Lockwood Square London SE16 2HY
 160 Lockwood Square London SE16 2HY
 157 Lockwood Square London SE16 2HY
 154 Lockwood Square London SE16 2HY
 155 Lockwood Square London SE16 2HY
 156 Lockwood Square London SE16 2HY
 15 Marden Square London SE16 2HZ
 16 Marden Square London SE16 2HZ
 17 Marden Square London SE16 2HZ
 14 Marden Square London SE16 2HZ
 11 Marden Square London SE16 2HZ
 12 Marden Square London SE16 2HZ
 13 Marden Square London SE16 2HZ
 21 Marden Square London SE16 2HZ
 22 Marden Square London SE16 2HZ
 23 Marden Square London SE16 2HZ
 20 Marden Square London SE16 2HZ
 18 Marden Square London SE16 2HZ
 19 Marden Square London SE16 2HZ
 2 Marden Square London SE16 2HZ
 10 Marden Square London SE16 2HZ
 180 Lockwood Square London SE16 2HY
 181 Lockwood Square London SE16 2HY
 182 Lockwood Square London SE16 2HY
 179 Lockwood Square London SE16 2HY
 176 Lockwood Square London SE16 2HY
 177 Lockwood Square London SE16 2HY
 178 Lockwood Square London SE16 2HY
 187 Lockwood Square London SE16 2HY
 188 Lockwood Square London SE16 2HY
 1 Marden Square London SE16 2HZ
 186 Lockwood Square London SE16 2HY
 183 Lockwood Square London SE16 2HY
 184 Lockwood Square London SE16 2HY
 185 Lockwood Square London SE16 2HY
 59 New Place Square Drummond Road SE16 2HP
 10 John Mckenna Walk Tranton Road SE16 4SW
 62 Lucey Way Rouel Road Estate SE16 3UF
 27 Prestwood House Drummond Road SE16 4BX
 Via Email x
 28 Sutherland Square London

Via Email x
 72 Arica House Slippers Place SE16 2EJ
 28 Banyard Road London SE16 2YA
 17 Wilson Grove London se16 4pj
 17 Clements Rd London SE16 4DW
 34 Wrayburn House Llewellyn Street SE16 4XA
 15 Aylesbury Road London SE17 2EQ
 6 William Ellis Way London se16 4ry
 84 Maltings Place 169 Tower Bridge Rd SE1 3LJ
 9 Market Place London SE16 3UQ
 11,15,17,19 Bombay Street Bermondsey SE16 3UX
 54 Glanfield Road London BR33JU
 32 Banyard Road London SE16 2YA
 351 Southwark Park Road London SE16 2JW
 Ground Floor 94 Webster Road SE16 4DF
 Bridgestone House 27 Blue Anchor Lane SE16 3UL
 27 Blue Anchor Lane, Bridgestone House London SE16 3UL
 176 Rotherhithe New Road London se16 2ap
 53 Lynton Road South Gravesend DA11 7NE
 Flat 26, Bridgestone House 27 Blue Anchor Lane London SE16 3UL
 Flat 26, Bridgestone House 27 Blue Anchor Lane SE16 3UL
 27 Rudge House, Llewellyn Street Bermondsey SE16 4XE
 Liberal Democrat Councillors For Riverside Ward Councillors Anood

36 John Roll Way London SE16 4SP
37 John Roll Way London SE16 4SP
39 John Roll Way London SE16 4SP
Flat 18 Prestwood House St Crispins Estate SE16 4BX
Flat 19 Prestwood House St Crispins Estate SE16 4BX
Flat 2 Prestwood House St Crispins Estate SE16 4BX
Flat 17 Prestwood House St Crispins Estate SE16 4BX
Flat 14 Prestwood House St Crispins Estate SE16 4BX
Flat 15 Prestwood House St Crispins Estate SE16 4BX
Flat 16 Prestwood House St Crispins Estate SE16 4BX
Flat 24 Prestwood House St Crispins Estate SE16 4BX
Flat 25 Prestwood House St Crispins Estate SE16 4BX
Flat 26 Prestwood House St Crispins Estate SE16 4BX
Flat 23 Prestwood House St Crispins Estate SE16 4BX
Flat 20 Prestwood House St Crispins Estate SE16 4BX
Flat 21 Prestwood House St Crispins Estate SE16 4BX
Flat 22 Prestwood House St Crispins Estate SE16 4BX
Flat 13 Prestwood House St Crispins Estate SE16 4BX
3 Gillison Walk London SE16 4SS
4 Gillison Walk London SE16 4SS
5 Gillison Walk London SE16 4SS
2 Gillison Walk London SE16 4SS
2 Toussaint Walk London SE16 4SR
4 Toussaint Walk London SE16 4SR
1 Gillison Walk London SE16 4SS
Flat 10 Prestwood House St Crispins Estate SE16 4BX
Flat 11 Prestwood House St Crispins Estate SE16 4BX
Flat 12 Prestwood House St Crispins Estate SE16 4BX
Flat 1 Prestwood House St Crispins Estate SE16 4BX
6 Gillison Walk London SE16 4SS
7 Gillison Walk London SE16 4SS
8 Gillison Walk London SE16 4SS
Flat 10 Chalfont House St Crispins Estate SE16 4BZ
Flat 11 Chalfont House St Crispins Estate SE16 4BZ
Flat 12 Chalfont House St Crispins Estate SE16 4BZ
Flat 1 Chalfont House St Crispins Estate SE16 4BZ
Flat 7 Farmer House St Crispins Estate SE16 4BY
Flat 8 Farmer House St Crispins Estate SE16 4BY
Flat 9 Farmer House St Crispins Estate SE16 4BY
Flat 17 Chalfont House St Crispins Estate SE16 4BZ
Flat 18 Chalfont House St Crispins Estate SE16 4BZ
Flat 19 Chalfont House St Crispins Estate SE16 4BZ
Flat 16 Chalfont House St Crispins Estate SE16 4BZ
Flat 13 Chalfont House St Crispins Estate SE16 4BZ
Flat 14 Chalfont House St Crispins Estate SE16 4BZ
Flat 15 Chalfont House St Crispins Estate SE16 4BZ
Flat 6 Farmer House St Crispins Estate SE16 4BY
Flat 6 Prestwood House St Crispins Estate SE16 4BX
Flat 7 Prestwood House St Crispins Estate SE16 4BX
Flat 8 Prestwood House St Crispins Estate SE16 4BX
Flat 5 Prestwood House St Crispins Estate SE16 4BX
Flat 27 Prestwood House St Crispins Estate SE16 4BX
Flat 3 Prestwood House St Crispins Estate SE16 4BX
Flat 4 Prestwood House St Crispins Estate SE16 4BX
Flat 3 Farmer House St Crispins Estate SE16 4BY
Flat 4 Farmer House St Crispins Estate SE16 4BY
Flat 5 Farmer House St Crispins Estate SE16 4BY
Flat 2 Farmer House St Crispins Estate SE16 4BY
Flat 9 Prestwood House St Crispins Estate SE16 4BX
Flat 1 Farmer House St Crispins Estate SE16 4BY
Flat 10 Farmer House St Crispins Estate SE16 4BY
Bon Burguer Southwark Park Road Market SE16 1AA
Compass School Southwark Drummond Road SE16 4EE
2a Ambrose Street London SE16 3NY
Block F Unit V22 Tower Bridge Business Complex SE16 4DG
Block J Unit 503 Tower Bridge Business Complex SE16 4DU
Flat 3 267 Southwark Park Road SE16 3TP
Flat 2 Bridgestone House SE16 3UL
Flat 3 Bridgestone House SE16 3UL
Flat 4 Bridgestone House SE16 3UL
Flat 1 Bridgestone House SE16 3UL
300a Southwark Park Road London SE16 2HB
Block J Unit 502 Tower Bridge Business Complex SE16 4DU
1 Almond Road London SE16 3LR

Al-Samerai, Eliza Mann And Hamish Mccallum
387 Southwark Park Road London SE16 2JH
22 Webster Road London SE16 4DF
Flat 3 Costermonger Building 10 Arts Lane SE16 3GA
13 Webster Road London SE16 4DQ
25 Fowey Close London E1W 2JP
17 Clements Road London SE16 4DW
Webster Road London
Big Local Works At 4 Market Place Southwark Park Road SE16 3UQ
6 Emba Street Wilson Grove SE16 4PL
11,15,17 And 19 Bombay St Bermondsey SE16 3UX
Flat 30 Lock House Tavern Quay SE16 7FB
46 Flannery Court London SE16 4DX
26 Toronto House Surrey Quays Road SE16 7AJ
374 Walworth Rd London SE17 2NS
29 John Ruskin Street London SE5 0PF
22 Fielding Street London SE17 3HD
74 Brandon Street London SE17 1NE
49 Wendover, Thurlow Street London SE17 2UF
22 Fielding Street London SE17 3HD
11 Howard Court, Peckham London SE15 3PH
13 Fitzmaurice House London SE16 3PG
70 Goodwin Close Bermondsey SE16 3TL
16 Ronald Buckingham Court, Kenning St Rotherhithe SE16 4LL
Trafalgar Street, 183 London SE17 2TP
Flat 36, Globe Wharf London SE16 5XS
2d Talfourd Place London SE15 5NW
Flat 15, Maxden Court, Maxted Road London SE15 4LQ
265 Galliard Road Edmonton N9 7NR
6 The Drive London NW11 9SR
24 Pullens London SE17 3SJ
Flat 6 Milner Court, 9 Colegrove Road London SE15 6NG
108 Chilton Grove London SE8 5DY
26 Crofton Road London SE5 8NB
Flat 110, 9 Steedman Street London SE17 3BA
105 Wells Way London SE5 7SZ
148a Jerningham Road London SE14 5NL
I Rossland Close Bexleyheath DA6 7PP
Flat 4, Leconfield House Champion Hill Estate SE5 8AY
59 Howland Way London SE16 6HW
79 Grove Hill Road Camberwell SE5 8DF
5 Franklyn Park Lurgan BT66 7AJ
29 Olympia Hill Morpeth NE61 1JH
Flat 6, Bramcote Arms London SE21 8EN
Flat 10 Bridgnorth House Peckham Park Road SE15 1RJ
Flat 6, Hadrian Court, 27 Breakspears Road London SE4 1XP
152 Pomeroy St London SE14 5BT
101 St James Road London SE16 4RA
Flat 2, 46d Bird In Bush Rd London SE15 6RW
Flat 504 Arum House London SE17 1FJ
1 Tor House London N6 5QL
1 Waterloo Gardens London N1 1TY
18 Rothesay Court London SE11 5SU
Flat 18 Martock Court London SE15 2PL
53 Shipwright Rd London SE16 6QA
43 Comber House, Comber Grove London SE5 0LJ
Hurst Street London SE24 0EG
11 Princes Riverside Road SE16 5RD
37 Snowsfields London SE1 3SU
Flat 2 Bridges House, Elmington Estate London SE5 7QL
Flat 409, 52 Peckham Grove London SE15 6AW
47a Trafalgar Avenue London SE15 6NP
65, Monkton Street London SE11 4TX
49 John Kennedy House Rotherhithe Old Road SE16 2QE
17 Brunlees House London SE1 6QF
10 Merritt Road London SE4 1DY

Cabinet Suite 160 Tooley Street SE1 2QH

26 Foxley Gardens Purley CR8 2DQ
17 Mundania Road London SE22 0NH
142 Roslyn Road London N15 5JJ
129 B Camberwell Road London SE5 0HB
Marshalsea Road London SE1 1JW
55a Kirkwood Road London SE15 3XU
42 Camberwell Grove London SE5 8RE

Flat 3, 63-71, Rye Hill Park London SE15 3JR

1a Almond Road London SE16 3LR
 Unit 3 19 Blue Anchor Lane SE16 3UL
 Unit 5 19 Blue Anchor Lane SE16 3UL
 Block J Unit 501 Tower Bridge Business Complex SE16 4DG
 Living Accommodation St James Tavern SE16 4QZ
 Block E Unit 01a Tower Bridge Business Complex SE16 4DG
 Block E Unit 01b Tower Bridge Business Complex SE16 4DU
 Flat 24 Bridgestone House SE16 3UL
 Flat 25 Bridgestone House SE16 3UL
 Flat 26 Bridgestone House SE16 3UL
 Flat 23 Bridgestone House SE16 3UL
 Flat 20 Bridgestone House SE16 3UL
 Flat 21 Bridgestone House SE16 3UL
 Flat 22 Bridgestone House SE16 3UL
 Flat 4 Arch House SE16 3UL
 Flat 5 Arch House SE16 3UL
 Flat 6 Arch House SE16 3UL
 Flat 3 Arch House SE16 3UL
 Flat 27 Bridgestone House SE16 3UL
 Flat 1 Arch House SE16 3UL
 Flat 2 Arch House SE16 3UL
 Flat 19 Bridgestone House SE16 3UL
 Flat 9 Bridgestone House SE16 3UL
 Flat 10 Bridgestone House SE16 3UL
 Flat 11 Bridgestone House SE16 3UL
 Flat 8 Bridgestone House SE16 3UL
 Flat 5 Bridgestone House SE16 3UL
 Flat 6 Bridgestone House SE16 3UL
 Flat 7 Bridgestone House SE16 3UL
 Flat 16 Bridgestone House SE16 3UL
 Flat 17 Bridgestone House SE16 3UL
 Flat 18 Bridgestone House SE16 3UL
 Flat 15 Bridgestone House SE16 3UL
 Flat 12 Bridgestone House SE16 3UL
 Flat 13 Bridgestone House SE16 3UL
 Flat 14 Bridgestone House SE16 3UL
 268b Southwark Park Road London SE16 3RN
 Living Accommodation Ancient Forresters SE16 3TP
 Arches 642 And 642w Tower Bridge Business Complex SE16 4DG
 Arches 643 644 And 644w Tower Bridge Business Complex SE16 4DG
 47a Blue Anchor Lane London SE16 3UL
 1 Alfred Court 13 Bombay Street SE16 3UX
 47 Blue Anchor Lane SE16 3UL
 41 Blue Anchor Lane SE16 3UL
 43 Blue Anchor Lane SE16 3UL
 45 Blue Anchor Lane SE16 3UL

5 Glengall Terrace London SE15 6NW
 510 Thames Tunnel Mills 113 Rotherhithe Street SE16 4NJ
 90 Hartley House, Chambers Street London SE16 4EP
 32b Larcom Street London SE17 1NQ
 2 Great Spilmans London SE22 8SZ
 15a New Church Road Camberwell SE5 7JH
 35 Canon Beck Road London SE16 6DF
 57 Henley Drive London SE1 3AR
 Flat 401, Oxo Tower Wharf. Southbank SE1 9GY
 146c Southwark Bridge Road London SE1 0DG
 Flat 4 Burrell House Haggard Road TW1 3AG
 12 Lawns Avenue Twickenham TW1 4TD
 13 Fairwood Terrace Swansea SA4 3AE
 10 Russell Mansions, 144 Southampton Row WC1B 5AJ
 Cefn Bryn Uplands Gowerton Swansea SA4 3ET
 103 Sienna Alto, Lewisham London SE13 7FZ
 2 Railway Cottages Appleby CA16 6BY
 4 Bridge Place Nether Compton DT9 4QF
 1 St. Olavs Square, Albion Street London SE16 7JB
 Flat 5 Delany House, Thames St SE10 9DQ
 7 Longfield Road Bristol BS7 9AG
 70, Eluna Apartments, 4, Wapping Lane London E1W 2RG
 Flat 2, 19 Dartmouth Road London SE23 3HN
 Drakefield Road London SW17 8RT
 230c Commercial Way London SE15 1PT
 46 Mazenod Avenue London NW6 4LR
 113 Edgehill Rd London CR4 2HZ
 78 Fox Hollow Drive Bexleyheath DA7 4UR
 Flat 5 Delany House London SE10 9DQ
 13 Vernon Road Harrogate HG2 8DE
 100 Cavendish Court Durham DH7 8UW
 17 Lavender Gardens Newcastle NE2 3DD
 Flat 2, 19 Dartmouth Road London SE23 3HN
 27 Meeting House Lane London SE15 2UN
 74, Arcadian Gardens London N22 5AD
 84 Temple Sheen Road London SW14 7RR
 46 Thorburn Square London SE1 5QL
 2 Railway Cottages Appleby CA16 6BY
 42 Lon Cadog, Sketty Swansea SA2 0TN
 Flat 10 St Bernards House Surbiton KT6 5BL
 Flat 12, Milliners House, 173 Bermondsey Street SE1 3UW
 58 Andoversford Court London SE15 6AF
 46 Reverdy Road London SE1 5QD
 106 Montreal House Surrey Quays Road SE16 7AQ
 46b Elliott'S Row London SE11 4SZ
 212 Highbury New Park London N5 2LH

Re-consultation: 15/06/2018

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APPENDIX 2

Consultation responses received

Internal services

Economic Development Team

Statutory and non-statutory organisations

Environment Agency
Greater London Authority
Historic England
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Big Local Works At 4 Market Place Southwark Park Road SE16 3UQ
Bridgestone House 27 Blue Anchor Lane SE16 3UL
Cabinet Suite 160 Tooley Street SE1 2QH
Cefn Bryn Uplands Gowerton Swansea SA4 3ET
Drakefield Road London SW17 8RT
Email representation
Flat 10 Bridgnorth House Peckham Park Road SE15 1RJ
Flat 10 St Bernards House Surbiton KT6 5BL
Flat 11 Bridgestone House SE16 3UL
Flat 110, 9 Steedman Street London SE17 3BA
Flat 12, Milliners House, 173 Bermondsey Street SE1 3UW
Flat 13 Bridgestone House SE16 3UL
Flat 15, Maxden Court, Maxted Road London SE15 4LQ
Flat 18 Bridgestone House SE16 3UL
Flat 18 Bridgestone House SE16 3UL
Flat 18 Martock Court London SE15 2PL
Flat 2 Bridges House, Elmington Estate London SE5 7QL
Flat 2, 19 Dartmouth Road London SE23 3HN
Flat 2, 19 Dartmouth Road London SE23 3HN
Flat 2, 46d Bird In Bush Rd London SE15 6RW
Flat 22 Bridgestone House SE16 3UL
Flat 24 Bridgestone House SE16 3UL
Flat 26 Bridgestone House SE16 3UL
Flat 26, Bridgestone House 27 Blue Anchor Lane London SE16 3UL
Flat 26, Bridgestone House 27 Blue Anchor Lane SE16 3UL
Flat 3 Bridgestone House SE16 3UL
Flat 3 Costermonger Building 10 Arts Lane SE16 3GA
Flat 3, 63-71, Rye Hill Park London SE15 3JR
Flat 30 Lock House Tavern Quay SE16 7FB
Flat 36, Globe Wharf London SE16 5XS
Flat 4 Burrell House Haggard Road TW1 3AG
Flat 4, Leconfield House Champion Hill Estate SE5 8AY
Flat 401, Oxo Tower Wharf. Southbank SE1 9GY
Flat 409, 52 Peckham Grove London SE15 6AW
Flat 5 Delany House London SE10 9DQ
Flat 5 Delany House, Thames St SE10 9DQ
Flat 504 Arum House London SE17 1FJ
Flat 6, Bramcote Arms London SE21 8EN
Flat 6, Hadrian Court, 27 Breakspears Road London SE4 1XP
Flat 6 Milner Court, 9 Colegrove Road London SE15 6NG

Hurst Street London SE24 0EG
I Rossland Close Bexleyheath DA6 7PP
Marshalsea Road London SE1 1JW
Trafalgar Street, 183 London SE17 2TP
Unit 2 23a Blue Anchor Lane SE16 3UL
Unit 2 23a Blue Anchor Lane SE16 3UL
Webster Road London
1 Drappers Way London SE16 3UA
1 St. Olavs Square, Albion Street London SE16 7JB
1 Tor House London N6 5QL
1 Waterloo Gardens London N1 1TY
10 Merritt Road London SE4 1DY
10 Russell Mansions, 144 Southampton Row WC1B 5AJ
100 Cavendish Court Durham DH7 8UW
101 St James Road London SE16 4RA
101 St Jamess Road London SE16 4RA
103 Marden Square London SE16 2JA
103 Sienna Alto, Lewisham London SE13 7FZ
105 Wells Way London SE5 7SZ
106 Montreal House Surrey Quays Road SE16 7AQ
108 Chilton Grove London SE8 5DY
11 Howard Court, Peckham London SE15 3PH
11 Princes Riverside Road SE16 5RD
11,15,17 And 19 Bombay St Bermondsey SE16 3UX
11,15,17,19 Bombay Street Bermondsey SE16 3UX
113 Edgehill Rd London CR4 2HZ
12 Lawns Avenue Twickenham TW1 4TD
129 B Camberwell Road London SE5 0HB
13 Fairwood Terrace Swansea SA4 3AE
13 Fitzmaurice House London SE16 3PG
13 Vernon Road Harrogate HG2 8DE
13 Webster Road London SE16 4DQ
142 Roslyn Road London N15 5JJ
146c Southwark Bridge Road London SE1 0DG
148a Jerningham Road London SE14 5NL
15 Aylesbury Road London SE17 2EQ
15 Aylesbury Road London SE17 2EQ
15a New Church Road Camberwell SE5 7JH
152 Pomeroy St London SE14 5BT
16 Ronald Buckingham Court, Kenning St Rotherhithe SE16 4LL
16 Webster Road London SE16 4DF
16 Webster Road London SE16 4DF
17 Brunlees House London SE1 6QF
17 Clements Rd London SE16 4DW
17 Clements Road London SE16 4DW
17 Clements Road London SE16 4DW
17 Lavender Gardens Newcastle NE2 3DD
17 Mundania Road London SE22 0NH
17 Wilson Grove London se16 4pj
176 Rotherhithe New Road London se16 2ap
18 Market Place London SE16 3UQ
18 Rothesay Court London SE11 5SU
180 Marden Square London SE16 2JD
180 Marden Square London SE16 2JD
2 Great Spilmans London SE22 8SZ
2 Railway Cottages Appleby CA16 6BY
2 Railway Cottages Appleby CA16 6BY
2d Talfourd Place London SE15 5NW
212 Highbury New Park London N5 2LH
22 Fielding Street London SE17 3HD
22 Fielding Street London SE17 3HD
22 Webster Road London SE16 4DF

22 Webster Road London SE16 4DF
23 Clements Road London SE16 4DW
230c Commercial Way London SE15 1PT
24 Lockwood Square London SE16 2HS
24 Pullens London SE17 3SJ
24 Webster Road London SE16 4DF
25 Blue Anchor Lane London SE16 3UL
26 Crofton Road London SE5 8NB
26 Foxley Gardens Purley CR8 2DQ
26 Toronto House Surrey Quays Road SE16 7AJ
26 Webster Road London SE16 4DF
265 Galliard Road Edmonton N9 7NR
27 Blue Anchor Lane, Bridgestone House London SE16 3UL
27 Meeting House Lane London SE15 2UN
27 Rudge House, Llewellyn Street Bermondsey SE16 4XE
28 Banyard Road London SE16 2YA
29 John Ruskin Street London SE5 0PF
29 Marden Square London SE16 2HZ
29 Olympia Hill Morpeth NE61 1JH
3 Marden Square London SE16 2HZ
3 Marden Square London SE16 2HZ
30 Marden Square London SE16 2HZ
31 Clements Road London SE16 4DW
32 Banyard Road London SE16 2YA
32b Larcom Street London SE17 1NQ
34 Wrayburn House Llewellyn Street SE16 4XA
35 Canon Beck Road London SE16 6DF
351 Southwark Park Road London SE16 2JW
37 Snowfields London SE1 3SU
374 Walworth Rd London SE17 2NS
387 Southwark Park Road London SE16 2JH
39 Collett Road London SE16 4DJ
4 Bridge Place Nether Compton DT9 4QF
4 Market Place London SE16 3UQ
42 Camberwell Grove London SE5 8RE
42 Lon Cadog, Sketty Swansea SA2 0TN
43 Comber House, Comber Grove London SE5 0LJ
46 Flannery Court London SE16 4DX
46 Mazenod Avenue London NW6 4LR
46 Reverdy Road London SE1 5QD
46 Thorburn Square London SE1 5QL
46b Elliott'S Row London SE11 4SZ
47a Trafalgar Avenue London SE15 6NP
49 John Kennedy House Rotherhithe Old Road SE16 2QE
49 Wendover, Thurlow Street London SE17 2UF
5 Franklyn Park Lurgan BT66 7AJ
5 Glengall Terrace London SE15 6NW
510 Thames Tunnel Mills 113 Rotherhithe Street SE16 4NJ
53 Lynton Road South Gravesend DA11 7NE
53 Shipwright Rd London SE16 6QA
54 Glanfield Road London BR33JU
55a Kirkwood Road London SE15 3XU
56 New Place Square London SE16 2HW
57 Henley Drive London SE1 3AR
58 Andoversford Court London SE15 6AF
59 Howland Way London SE16 6HW
6 Collett Road London SE16 4DD
6 Emba Street Wilson Grove SE16 4PL
6 The Drive London NW11 9SR
6 William Ellis Way London se16 4ry
65, Monkton Street London SE11 4TX
7 Longfield Road Bristol BS7 9AG

70, Eluna Apartments, 4, Wapping Lane London E1W 2RG
70 Goodwin Close Bermondsey SE16 3TL
72 Arica House Slippers Place SE16 2EJ
74, Arcadian Gardens London N22 5AD
74 Brandon Street London SE17 1NE
78 Fox Hollow Drive Bexleyheath DA7 4UR
79 Grove Hill Road Camberwell SE5 8DF
84 Maltings Place 169 Tower Bridge Rd SE1 3LJ
84 Temple Sheen Road London SW14 7RR
9 Market Place London SE16 3UQ
9 Market Place London SE16 3UQ
90 Hartley House, Chambers Street London SE16 4EP
90 Storks Road London SE16 4DP
90 Storks Road London SE16 4DP
92 Webster Road London SE16 4DF