

Item No. 8.1	Classification: Open	Date: 5 March 2019	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 18/AP/3246 for: Full Planning Application</p> <p>Address: LAND AT CANTIUM RETAIL PARK, 520 OLD KENT ROAD, LONDON SE1 5BA</p> <p>Proposal: Demolition of existing buildings and redevelopment of the site to provide a new basement level and buildings ranging from 3 to 48 storeys in height (max height 159.05m above ground level) comprising up to 1,113 residential units (Class C3), up to 5,659 sq. m of office floorspace (Class B1(a)), up to 2,228 sq. m of retail floorspace (Class A1), up to 2,336 sq. m of flexible space including use within Classes A1, A3, B1(a), B1(b), D1, D2 and / or Sui Generis (Theatre) within Block B and up to 596 sq. m of flexible space within Classes A1, A2 and / or A3 within Block C together with associated access, car parking, landscaping and infrastructure works.</p> <p>The application is accompanied by an Environmental Statement which can be purchased from Ramboll (london@ramboll.co.uk) at a cost of £10 per copy for a CD and £698+VAT for a hard copy.</p>		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning		
Application Start Date	01/11/2018	Application Expiry Date	21/02/2019
Earliest Decision Date	06/12/2018		

RECOMMENDATION

1.
 - a) That planning permission be granted, subject to conditions and referral to the Mayor of London, referral to the Secretary of State and the applicant entering into an appropriate legal agreement by no later than 5 September 2019.
 - b) That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
 - c) That following issue of the decision it be confirmed that the Director of Planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1)(d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.

- d) In the event that the requirements of (a) are not met by 5 September 2019, that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 587 of this report.

EXECUTIVE SUMMARY

2. The proposal comprises the comprehensive redevelopment of the Cantium Retail Park, which includes the three retailers of B&Q, Pets at Home and Halfords. The site measures approximately 1.9ha and accommodates approximately 6,175 sq. m of retail floorspace (Class A1) with associated customer car parking, servicing and hard and soft landscaping.
3. Following the redevelopment, 1,113 new homes would be provided, which would contribute to helping the borough meet its housing need. The applicant has committed to providing 35.48% affordable housing measured by habitable rooms, which when measured at 35% would achieve 70% social rented and 30% intermediate. In total, 363 new affordable homes would be provided of which 237 would be social rented homes and 126 would be intermediate (shared ownership).
4. The proposal would include three tall buildings of 48, 37 and 26 storeys, which are considered to result in a well articulated composition of towers defining the public realm and serving a landmark role identifying the entrance to the new public realm including the linear park. Overall, the development would be of a very high quality of design. Whilst there would be some harm to views from the Glengall Road Conservation Area, Glengall Terrace and from the listed Church of our Lady Seven Dolours, the harm is considered less than substantial and is outweighed by the wider major regeneration benefits of the proposal.
5. The new homes would offer an excellent standard of accommodation for future occupiers as well as high quality communal amenity spaces and play spaces for children. 64% of the new homes would be dual aspect which is considered a very good level of compliance. Whilst there would be some flats that would have a sole frontage onto the Old Kent Road, these would benefit from a fully enclosed winter gardens on the return corner. In addition, the single aspect 'back to back' houses and the maisonettes in Block A have design features included to mitigate their single aspect. A policy compliant mix of dwellings and wheelchair housing would be provided.
6. The creation of new retail, office and leisure floorspace would help to retain the established commercial function of the site but reconfigure and reimagine the floorspace such that it accords more closely with the proposal to reallocate the application site as falling within a 'town centre'. The reconfiguration of the floorspace would re-establish a more traditional 'high street' frontage along Old Kent Road.
7. Two of the existing retailers (Halfords and Pets at Home) have been confirmed to be re-provided following the redevelopment which is a positive aspect of the proposals. In addition, and in order to address the B&Q objection, B&Q would be offered an opportunity to take the "destination" space before it is offered to any other occupier, and accordingly all three existing retailers could be re-provided. Affordable office floorspace would be secured as part of the proposals as well as terms to secure independent retail units, for a diverse retail offer.

8. The proposal includes the delivery of a significant amount of new public open space including the gateway to the proposed Surrey Canal linear park and a new urban square, which is a significant benefit when compared to the existing tarmacked site. The proposal would also include high quality play space and additional private amenity space. A s106 would be collected to off set the shortfall in public open space which could go towards the delivery of the council's Frensham Street park. The 46th storey of Block C (the tallest tower) would have full resident access as well as managed public access.
9. The development is largely 'car free' and would accord with the objectives to minimise travel by private mode. The only car parking provided on site would be those serving accessible 'wheelchair' units (34), retail in Block B (18) and car clubs (3). The development would encourage residents to utilise sustainable modes of transport with the provision of secure cycle parking for all residents and commercial occupiers (2,035 cycle spaces in total). A s106 contribution would be required to improve local bus capacity in advance of the Bakerloo Line Extension.
10. There would be significant impacts on some neighbouring residents in terms of daylight and sunlight however these are considered to be acceptable within the context of the BRE guidelines and the surrounding townscape.
11. All of the surface water attenuation would take place on site and discharges would be limited to 'greenfield' runoff rates which is very good. The drainage strategy incorporates blue and green roofs as well as permeable paving and underground storage tanks.
12. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a contribution to the council's carbon off-set green fund would be secured through a s106 agreement. A range of other s106 obligations would be secured, including delivery and management of the park spaces as well as securing public access. Overall, the benefits of the proposal are considered to outweigh the harm caused, and it is recommended that planning permission be granted, subject to conditions and the signing of a S106 agreement and referral to the GLA and Secretary of State.

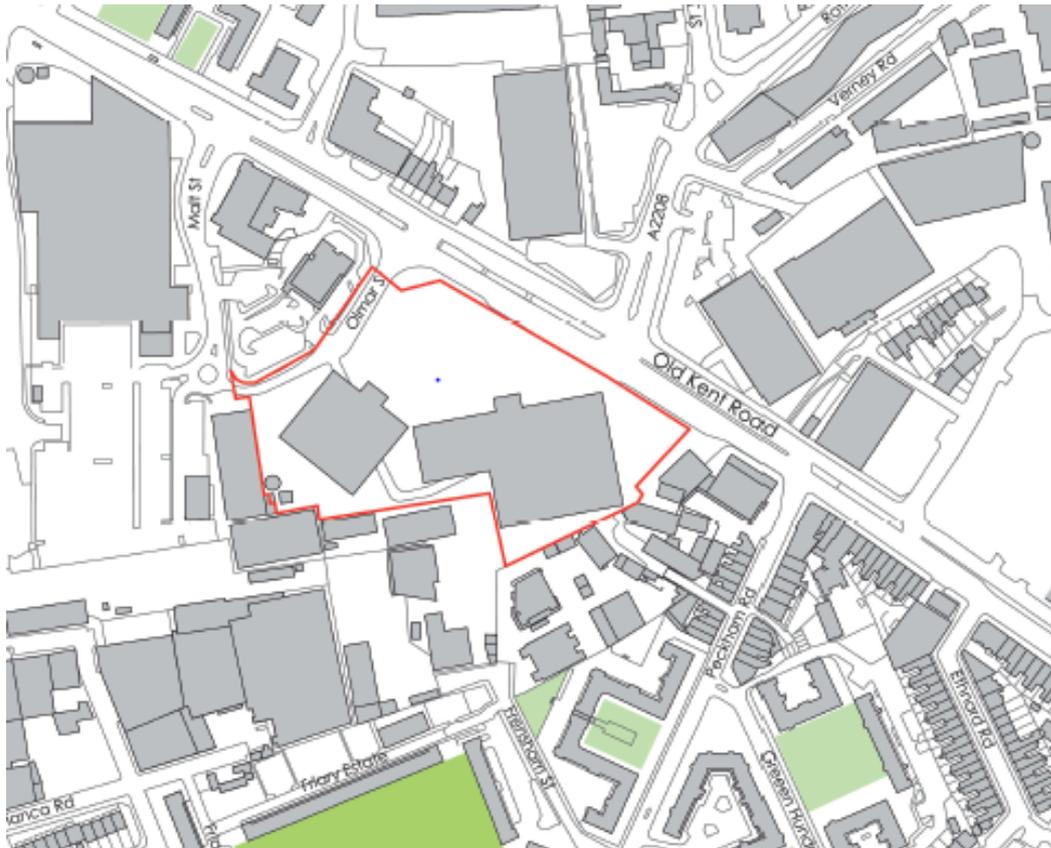
BACKGROUND INFORMATION

Site location and description

13. The application site currently comprises of three large retail warehouse units within the Cantium Retail park. A large detached building occupied by B&Q and two attached retail units occupied by Halfords and Pets at Home. The remainder of the site is utilised for car parking to the retail units. The site is 1.9 hectares in area and is located on the southwestern side of Old Kent Road. The retail park provides vehicular access from Olmar Street to the north of the site.
14. Both retail buildings are of low architectural merit and there is no active frontage along the site as the buildings have extensive blank frontages that are set back from the road. A brick and metal boundary approximately one metre high wraps around the pavements along Old Kent Road and Olmar Street and behind this boundary there is a row of sparsely planted trees.

15. The large area used for car parking is approximately 1.2m lower than street level along Old Kent Road. The service yard to the retail facilities is accessed from Olmar Street.
16. The closest residential occupiers are located opposite the site on the other side of Old Kent Road and to the south on Peckham Park Road.

Image: Site plan



The surrounding area

17. The application site forms part of a cluster of retail warehouse units and other commercial uses. Retail warehouses occupied by Asda, Topps Tiles, Currys PC World, B&M and Carpetright are all within the immediate vicinity of the site. Other uses such as builders merchants, car hire can also be found nearby as well as McDonalds and KFC restaurants.
18. To the east there is Topps Tiles and the site referred to as the former Civic Centre and Livesey Place which is subject to a planning application for residential led mixed use development. To the south are industrial premises referred to as Malt Street which is also subject to a planning for a residential led mixed use development and a Council owned depot. Further to south is the Nye's Wharf site of which there is a resolution to grant planning permission. To the west is an Asda superstore and industrial warehouses (forming the Glengall Business Centre). Further to the west of the site is Burgess Park.

19. Outside the large clusters of modern warehouses, the building typologies along the Old Kent Road are typically traditional Victorian form comprising three to four storey houses with high street commercial uses at ground floor.

Details of proposal

20. Planning permission is sought for the demolition of the existing retail warehouses on site to provide a development over three blocks (A, B, C). The scheme would create up to 1,113 residential units (Class C3), up to 5,659sqm of office floorspace (Class B1(a), up to 2,228 sqm of retail floorspace (class A1), up to 2,336 sqm of flexible space including use within Classes A1, A3, B1(a), B1(b), D1, D2 and/or Sui Generis (Theatre) within Block B and up to 596sqm of flexible space within Classes A1, A2 and/or A3 within Block C together with associated access, car parking, landscaping and infrastructure works.
21. The tallest elements of the proposed development comprise Block C1 (48 storeys), Block B1 (36 storeys) and Block A1 (27 storeys).

Block A

22. The proposed Block A element of the scheme is to be located at the western end of the site. This section would comprise of a mix of lower rise elements which include three storey 'back to back' townhouses and four storey residential blocks. Additionally, a residential tower of 26 storeys is proposed in an entirely exclusive residential area of the site that would surround a courtyard space.
23. Social rent units would be provided in the 26 storey tower.

Block B

24. Block B proposes the creation of four individual cores that would facilitate access to the separate elements. The block proposes a residential tower (Core B1) in the northern corner of the site that rises to a height of 37 storeys. The remaining residential buildings form a mid-level perimeter block with heights ranging from 9 storeys (Core B2), 11 storeys (Core B4), and 12 storeys (Core B3). The buildings would surround a podium and opens space area. Within this block the majority of the commercial floorspace in this development is proposed with office space also included up to 11 storeys in the buildings that front onto Old Kent Road to the east.
25. This block would be a mixed tenure block with separate cores for private units, shared ownership and social rented units.

Block C

26. Block C, in the south-eastern corner of the site, consists of two towers that are to be connected by a double height entrance lobby that rise up to 48 and 13 storeys respectively. This block would facilitate retail uses at the ground floor level that enables a 'high street' character within the development. To the rear of the towers is a proposed linear park with the development aiding in providing an active entrance to the linear park.
27. This block would contain solely private units.

Image: Proposed site layout



Table: Proposed development building heights

Block	No. of floors	Building height (m) AOD	Building height (m)
A	26	88.7	86.4
B	37	127.2	124.4
C	48	162.1	159.05

Table: Existing floorspace

Unit	Use class	Floorspace (GIA)
B&Q	A1	950sqm
Halfords	A1	950sqm
Pets at Home	A1	4,331sqm
Total		6,231sqm

Table: Proposed floorspace

Use Class	Floorspace (GIA)
Retail (Class A1)	2,228sqm
High Street commercial (Class A1-A3)	596sqm
Office (B1(a))	5,659sqm
Destination (Sui Generis)	2,336sqm
Total	10,819sqm

28. The proposed residential mix and tenure by unit is set out in the table below.

Table: Residential tenure

Tenure	Units		Hab rooms	
	No.	%	No.	%
Total	1,113	100	3,280	100
Private	750	68	2,116	65
Social rent	237	22	804	25
Intermediate	126	12	360	10

29. The development would provide 35.48% of habitable rooms as affordable housing. Overall, this would equate to a tenure split of 69% as social rented and 31% intermediate. However, at 35%, the development would provide a policy compliant tenure split of 70% social rented and 30% intermediate.
30. Originally, the development was to include London Affordable rent but this was switched to social rent during the course of the application.

Landscaping and open space

31. New hard and soft landscaped areas are proposed to provide public and private amenity spaces for the new and existing residential and business communities.
32. The proposed development would deliver a significant element of the proposed linear park. It would also include an urban square, a residential courtyard, a dual level podium garden and a series of roof gardens. The linear park and public square would be fully accessible to the public. The roof top garden on Tower C would also be made available for some limited public access. The courtyards of Block A and Block B would be for residents use only.

Servicing, parking and access

33. The site would continue to utilise the existing vehicular access which is via Olmar Street. A new internal access road would be created providing access to the basement under Block B and a 'drop off' point serving Block C and the 'destination space'. There would be no vehicle movement across the linear park except for emergency vehicle access. Street level parking would be limited to drop off/delivery, blue badge and car club parking spaces.
34. A total of 55 car parking spaces would be provided at ground (3) and basement (52) levels. The basement would be accessed via a ramp from the new internal access road to the rear of Block B itself accessed via Olmar Street. The proposed car parking spaces would be used to serve the accessible residential units (34 spaces) and the larger retail units fronting onto Old Kent Road (18 spaces). There would also be dedicated provision at ground floor level for five courier / delivery drop-off spaces, three 'car club' spaces and a 'taxi' waiting space.
35. The proposed development has also been designed to promote the use of cycling. The development would provide 2,035 cycle parking spaces at ground and basement level.

36. The proposed development would include enclosed provision for servicing and deliveries. Block B would include an enclosed, 'off road' service yard that will be accessed directly from Olmar Street. The facility will serve the main retail units and 'destination space' within Block B. It would also act as a centralised location for the collection of residential refuse from both Blocks B and C. The residential refuse will be moved from Block C to Block B via the basement to protect the amenity of the ground floor level.
37. The development would be constructed as one rolling phase. The table below sets out the indicative construction programme.

Table: Indicative construction programme

Phase	Duration (months)	Commencement Date	Completion Date
Enabling, Demolition and Clearance Work	8 months	Q1 2020	Q3 2020
Substructure Works Blocks B and C (basement)	20 months	Q4 2020	Q2 2022
Superstructure Works – Block A	16 months	Q1 2021	Q3 2022
Superstructure Works – Block B	37 months	Q3 2021	Q3 2024
Superstructure Works – Block C	38 months	Q4 2021	Q1 2025
Block A Envelope Works	18 months	Q1 2022	Q2 2023
Block B Envelope Works	27 months	Q1 2023	Q2 2025
Block C Envelope Works	31 months	Q3 2022	Q2 2025
Block A Fit out	20 months	Q3 2022	Q3 2024
Block B Fit out	32 months	Q3 2023	Q1 2026
Block C Fit out	31 months	Q2 2023	Q3 2024
Block A Houses fit out	16 months	Q2 2023	Q3 2024
External works and landscaping	24 months	Q1 2024	Q1 2026

Scheme amendments

38. The applicant made a series of amendments and submitted further information to the scheme as follows:
- As referred to in paragraph 30 above, the application originally included London Affordable Rent housing but this was subsequently switched to social rented housing during the course of the application;
 - A summary of key planning issues document, summarising information already contained within the submitted Environmental Statement;

- Amendments made to revise the detailed design for the columns at the base of Block C tower, and to pull back the façade line on Block B, in order to increase the amount of available footway on the Old Kent Road;
- Commitment from the applicant to include provision for a long jump in within the park, complete with running track and sand pit;
- The submission of additional townscape view from Caroline Gardens to address comments made by Historic England;
- Additional information on flood risk, basement impact and drainage;
- Responses to consultations received from the GLA, TfL and B&Q; and
- A revised design for the three storey 'back to back' townhouses to address comments of the Design Review Panel.

39. The revised drawings and information was subject to a 14 day reconsultation.

Planning history

40. There have been a series of minor applications to the now established commercial use. The most relevant are those listed below.

41. 91/175 Application type: Full Planning Application (FUL)
Erection of two non food retail warehouses.
Decision date: 05/1991 Decision Granted (GRA)

42. 13/AP/1657 Application type: Certificate of Lawfulness - proposed (CLP)
Use of part of retail warehouse as an ancillary pet care and treatment facility
Decision date 28/08/2013 Decision: Granted (GRA)

43. 13/AP/2649 Application type: Full Planning Application (FUL)
Removal of the existing mezzanine and installation of a new mezzanine floor (measuring approximately 885 sq. m)
Decision date 09/10/2013 Decision: Granted (GRA)

44. 18/AP/1913 Application type: Scoping Opinion (EIA) (SCP)
Request for a EIA Scoping Opinion in respect of the proposed demolition of existing buildings and redevelopment of the site to provide a mixed use development including new buildings ranging between 3 to 48 storeys in height providing up to 1,160 residential units (Class C3), 4,318 sq. m of office floorspace (Class B1), 2,675 sq. m of commercial floorspace (Classes A1 - A3), 2,210 sq. m of destination space (flexible uses), together with associated car parking, landscaping and infrastructure works.'
Decision date 28/08/2018 Decision: Scoping Opinion - EIA Regs (SCP)

Pre-application advice

45. Pre-application advice was provided in advance of the submission of this application, details of which are held electronically by the Local Planning Authority. A number of meetings were held with the applicant and discussions that took place were around the height and massing of the buildings, the quality of the residential accommodation, the land uses, affordable housing and quality of the landscaped spaces. Pre-application meetings were also held with the Greater London Authority.

Planning history of adjoining sites

46. The council has received a number of planning applications recently in the Old Kent Road Opportunity Area. These include the following:

18/AP/0897 Ruby Triangle Site, Land bounded by Old Kent Road, Ruby Street and Sandgate Street

47. Application type: FULL

Full planning permission is sought for demolition of existing buildings and structures on the site, and redevelopment consisting of three buildings at maximum heights of 17 storeys (including mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (including mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,152 residential dwellings (Class C3), retail, business and community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works.

Decision: Resolution to grant, subject to a legal agreement, referral to the Mayor of London and Secretary of State (29 October 2018).

17/AP/2773 Malt Street Regeneration Site, land bounded by Bianca Road, Latona Road, Haymerle Road, Frensham Street and Malt Street (referred to in the report as Malt Street)

48. Application Type: FULL

Hybrid application comprising a full planning application for Phase 1 and outline planning permission for subsequent phases:

Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area (Phase 1) for the erection of a total of 4 buildings, two at 7 storeys (B9&B12), one at 15 storeys (B10), and one at 44 storeys (B4) (max height 147.12m AOD) to provide 420 homes, 1,197 sqm GEA of Class B1(c) floorspace and 785 sqm GEA of non-residential floor space within classes A1-A4, Class B1 and Class D1 and D2 use, an energy centre (750 sqm) and new public open space and public realm with 131 on street and basement car parking spaces and 697 cycle spaces.

Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and the erection of a seven buildings (B1, B2, B3, B5, B6, B7, B11) ranging in height from 5 to 39 storeys (max height 132.9m AOD) to provide up to 88,052sqm floorspace GEA, comprising up to 880 residential units, up to 3,316 sqm GEA of Class B1(c) floorspace and up to 1,702sqm GEA of non-residential floor space within classes A1-A4, Class B1, Class D1 and D2 use and 4 car parking spaces at ground level and up to 1,453 cycle spaces, with associated new open space, public realm, car parking and associated works.

Decision: Yet to be determined

17/AP/4596 13-14 Frensham Street, (Nyes Wharf)

49. Application Type: FULL
Demolition of existing buildings and erection of mixed-use scheme comprising 321sqm (GIA) of flexible A1, A2, A3, A4, B1, D1 and D2 floorspace and 882sqm (GIA) of B1 floorspace at ground and mezzanine levels; with 153 Residential units (Class C3) above in two blocks ranging from 9 to 18 storeys with hard and soft landscaping and associated infrastructure works, including three disabled spaces and cycle parking.

Decision: Resolution to grant, subject to a legal agreement and referral to the GLA (3 September 2018)

18/AP/3284 596-608 Old Kent Road and Land at Livesey Place (referred to in the report as Civic Centre)

50. Application type: FULL
Mixed-use redevelopment comprising the demolition of all existing buildings and structures (listed mural to be removed and stored prior to demolition, and incorporated into proposed development); construction of three buildings arranged around a central plinth ranging in height from 10 to 38 storeys (maximum height +144.2m AOD) above single basement, ground and mezzanines floors, to provide a range of uses including 372 residential units (Use Class C3), place of worship (Use Class D1), retail (Use Classes A1-A4), and office / light industrial (Use Classes B1(a)/B1(c)); means of access, public realm and landscaping works, parking and cycle storage provision, energy centre / plant and servicing areas, and associated ancillary works.

Decision: Yet to be determined

17/AP/4612 49-53 Glengall Road

51. Application type: FULL
Demolition of all existing buildings and structures (excluding some of the facades along Glengall Road and Bianca Road and the industrial chimney) and erection of a part 6, 8 and 15 storey mixed-use development comprising 3,855 sqm (GIA) of flexible workspace (Use Class B1) and 181 residential units (Use Class C3) with amenity spaces and associated infrastructure.

Decision: Resolution to grant, subject to a legal agreement and referral to the Mayor of London (15 January 2019).

KEY ISSUES FOR CONSIDERATION

Summary of main issues

52. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
 - Environmental impact assessment;
 - Affordable housing;
 - Design, layout, landscaping, heritage assets and tall buildings including views;
 - Impact on trees;
 - Housing mix including wheelchair housing;

- Quality of accommodation;
- Density;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport;
- Noise and vibration;
- Planning obligations (S.106 undertaking or agreement);
- Mayoral and Borough community infrastructure levy (CIL);
- Sustainable development implications;
- Energy;
- Ecology;
- Air quality;
- Ground conditions and contamination;
- Water resources and flood risk;
- Archaeology;
- Wind microclimate;
- Health Impact Assessment;
- Socio-economic impacts;
- Fire safety;
- Statement of community involvement
- Equalities and human rights;
- Other matters

Legal context

53. 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 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007.
54. There are also specific statutory duties in respect of the public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

55. The statutory development plans for the Borough comprise the National Planning Policy Framework 2012, London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The site falls within the area covered by the draft Old Kent Road Area Action Plan.

Planning Policy Designations

- 56.
- The Old Kent Road Opportunity Area
 - The Urban Density Zone
 - The Bermondsey Archaeological Priority Area
 - The Air Quality Management Area
 - The site is allocated within the draft Old Kent Road Area Action Plan (OKR AAP) as forming part of proposal site OKR 10.
 - Public transport accessibility level of 3 to 4 on a scale of 1-6 where 1 is the lowest level and 6 represents the highest.

- The proposed development would be visible in the extended background area (Wider Setting Consultation Area) of the Protected Vista to St Paul's Cathedral from Kenwood Assessment Point 3A.1.
- The proposed development would be visible in the Protected Vistas (but outside of the Viewing Corridor and Wider Setting Consultation Area) of St Paul's Cathedral from Parliament Hill Assessment Point 2A.1 and Blackheath Point Assessment Point 6A.1.

57. There are no statutory listed buildings on the application site. The closest listed buildings are:

- a mural depicting the history of Old Kent Road 50m east (Grade II listed);
- a number of properties along Canal Grove 125m to the north-east (Grade II); and
- properties along Glengall Road 370m west.

58. A more detailed list of further nearby listed buildings can be found at paragraphs 265-266.

59. The application site is not located within or adjacent to a conservation area. The nearest conservation area, Glengall Road is located 370m west.

60. The Peckham Cable Tunnel traverses a portion of the southern part of the site in close proximity to buildings C1 and C2. In this area there are also plans to build a new tunnel, referred to as London Power Tunnels Phase 2 (LPT2). The extent of this tunnel will run between Wimbledon and New Cross. The proposals for buildings C1 and C2 have taken into account the tunnels. The indicative tunnels of the Bakerloo Line Extension (BLE) have also been considered in the design and setting of these buildings.

61. This application should be determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant:

National Planning Policy Framework (the Framework)

62. 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'.

63. Paragraph 48 of the revised NPPF states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The council is preparing the New Southwark Plan (NSP) and OKR AAP which are emerging policy documents. The new London Plan is also in draft form. The weight that can be afforded to these emerging documents is discussed in greater detail in paragraphs 72-75 of this report.

- Section 2 - Achieving sustainable development
- Section 5 - Delivering a sufficient supply of homes
- Section 6 - Building a strong, competitive economy
- Section 7 - Ensuring the vitality of town centres

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

64. National Planning Policy Guidance 2014. (Web-based resource which brings together planning guidance on various topics into one place).

The London Plan 2016

65. The London Plan is the regional planning framework and was adopted in 2016. The most relevant policies are those listed below.

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

66. The London Plan 2016 identifies the Old Kent Road as an Opportunity Area with "significant potential for residential – led development along the Old Kent Road corridor" and identified an indicative employment capacity of 1,000 and a minimum of 2,500 new homes. Opportunity areas are described in the London Plan 2016 as London's major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.

67. Policy 2.13 in the London Plan 2016 sets out the strategic policy for the development and intensification of opportunity areas. Annex 1 includes an indicative capacity for Old Kent Road of 2,500 homes and 1,000 jobs and supports the development of a planning framework to realise the area's full growth potential. It goes on to state that the employment and minimum homes figures should be explored further and refined in a planning framework for the area and through a review of the Strategic Industrial Location and capacity to accommodate a phased rationalisation of its functions in the opportunity area or a provision elsewhere.

Core Strategy 2011

68. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

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

Southwark Plan 2007 (July) - saved policies

69. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

1.1 - Access to employment opportunities
1.7 - Development within town and local centres
1.11 - Arts, culture and tourism uses
2.1 - Enhancement of Community Facilities
2.2 - Provision of New Community Facilities
2.5 - Planning obligations
3.1 - Environmental effects
3.2 - Protection of amenity
3.3 - Sustainability assessment
3.4 - Energy efficiency
3.6 - Air quality
3.7 - Waste reduction
3.9 - Water
3.11 - Efficient use of land

- 3.12 - Quality in design
- 3.13 - Urban design
- 3.14 - Designing out crime
- 3.15 - Conservation of the Historic Environment
- 3.18 – Setting of Listed Buildings, Conservation Areas and World Heritage Sites
- 3.19 – Archaeology
- 3.20 – Tall Buildings
- 3.22 – Important Local Views
- 3.28 - Biodiversity
- 4.2 - Quality of residential accommodation
- 4.3 - Mix of dwellings
- 4.4 - Affordable housing
- 4.5 - Wheelchair affordable housing
- 5.2 - Transport impacts
- 5.3 - Walking and cycling
- 5.6 - Car parking
- 5.7 - parking standards for disabled people and the mobility impaired

Supplementary Planning Documents (SPDs)

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

Greater London Authority Supplementary Guidance

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

Emerging policy

Draft New London Plan

- 72. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Minor suggested changes to the plan were published on 13th August 2018 and an Examination in public (EIP) began on 15th January 2019. The EIP will continue until May 2019 and until the London Plan reaches formal adoption it can only be attributed limited weight. The draft New London Plan identified the Old Kent Road as having a minimum capacity for housing of 12,000 and a jobs target of 5,000.

Old Kent Road Area Action Plan (OKR AAP)

73. The council is preparing an Area Action Plan/Opportunity Area Planning Framework for Old Kent Road (AAP/OAPF) which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. Consultation has been underway for 3 years, with a first draft published in 2016. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2017 and concluded consultation on 21st March 2018. As the document is still in draft form, it can only be attributed very limited weight.
74. Whilst acknowledging this very limited weight, members are advised that the draft OKR AAP places the application site within the proposed Action Area Core, and within proposal site OKR 10 which covers the area bounded by Glengall Road, Latona Road and Old Kent Road. Requirements for this allocation site include requiring existing employment and retail floorspace to be replaced and frontages along Old Kent Road activated through provision of retail (A Class), business (B Class) or community uses (D Class). Also relevant to this specific site are the requirements to provide a new park on the alignment of the Surrey Canal and provide on site servicing.

New Southwark Plan (NSP)

75. 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. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 is being consulted on until 17 May 2019. It is anticipated that the plan will be adopted in late 2019 following an Examination in public (EIP). As the NSP is not yet adopted policy, it can only be attributed 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.

Principle of development in terms of land use

76. The National Planning Policy Framework offers a number of key principles that emphasise a focus on driving and supporting sustainable economic development to facilitate the delivery of new homes, office and commercial business units, infrastructure and prosperous centres. The application site is located on a site that is earmarked to be designated as a town centre. It is also within the Old Kent Road Opportunity Area. In locations such as these, the London Plan and Southwark Plan policies strive for higher density, high quality mixed use developments which assist in addressing the need for new homes and ranges of employment opportunities.
77. The site is also identified as falling within proposal site OKR10 within the draft OKR AAP. The draft site allocation states that redevelopment on this site must:
- Replace existing employment floorspace (B Class);
 - Replace existing retail floorspace and frontages along Old Kent Road activated through provision of retail (A Class), business (B Class) or community uses (D Class);

- Provide land for a new primary school on the Asda site;
- Provide a new park on the alignment of the Surrey Canal;
- Provide new pocket parks on the Asda site;
- Potentially provide a new tube station; and
- Provide on site servicing.

78. The existing retail warehouses and car parking are outdated and do not maximise the development potential for a Town Centre location.
79. The site does not include any existing employment (Class B) uses and is not identified as a 'Strategic' or 'Preferred Industrial Location'.

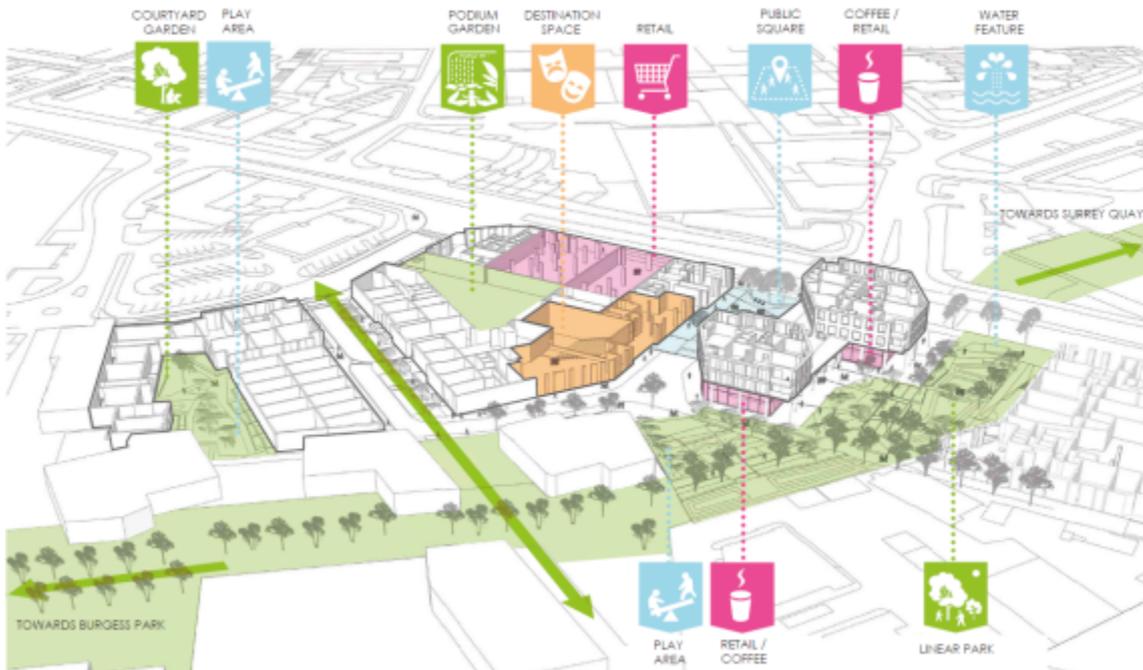
Assessment of main town centre uses

80. The NPPF, London Plan and Strategic Policy 3 of the Core Strategy, all require applications for "town centre" uses outside a defined centre to demonstrate a sequential approach to site selection and that there are no unacceptable impacts to any defined town centres.
81. The NPPF (2018) defines Main Town Centre Uses as: "Retail development (including warehouse clubs and factory outlet centres), leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."
82. The site is not currently within a designated town centre however, it falls within the boundary of one of the two Old Kent Road 'district centres' the council are proposing within the draft New Southwark Plan and draft OKR AAP.
83. The proposal includes the provision of up to 10,819 sq.m. (GIA) of town centre uses as set out in the table below.

Table:

Use Class	Floorspace GIA (sq.m.)
Retail (Use Class A1)	2,228
Flexible commercial (Use Classes A1-A3)	596
Office (Use Class B1(a))	5,659
Flexible Cultural space (Use Classes A1/A2/A3/B1(a)/B1(b)/D1/D2/Sui Generis)	2,336
Total	10,819

Image: Aerial of uses and landscape areas



84. The objective of the two new town centres is to create a more cohesive town centre that better meets the needs of existing and new residents and workers in the local area. The new district town centre that the site would form part would include retail, leisure, entertainment and recreation facilities in a significantly more attractive and accessible environment.
85. It follows that the site would form part of the defined town centre once the draft OKR AAP is adopted and the uses would help to support and contribute to the vitality and viability of that new centre.
86. The NPPF states that when assessing applications for retail, leisure and office development outside of town centres, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold, or if there is no locally set threshold, the default threshold is 2,500 sq.m. Southwark has no local threshold. London Plan Policy 4.7 and draft London Plan policy SD7 also requires an impact assessment. The impact assessment should test the impact of the proposal on existing, committed and planned public and private investment in centres in the catchment area of the proposal; and the impact on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years ahead.
87. 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 Old Kent Road is not identified as one of these designated town centres, despite the significant retail offer that it provides. 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.

88. 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.
89. The Southwark Retail Study was published in 2015 to provide a robust and credible evidence base to inform the council's work on the New Southwark Plan. This identified that Old Kent Road is the dominant destination for comparison shopping in the borough, and that as it is not currently a designated town centre it is vulnerable. It identifies that the area has been designated as an Opportunity Area and that there is a potential for a new town and/or local centres.
90. Acknowledging its limited weight, it is worth noting that emerging Policy P30, Town and Local Centres of the draft NSP proposes the Old Kent Road as two district centres. It also states that town centre uses will be permitted in town centres where:
- The scale and nature is appropriate to the role and catchment of the centre; and
 - A Use Classes are retained or replaced by an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and
 - The development would not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the character of the area; and
 - The development provides an active use at ground floor in locations with high footfall; and
 - Large schemes for town centre uses that are 1,000 sqm or more provide public toilets, public drinking fountains and public seating.
91. In terms of the allocation sites identified in the draft NSP, the application site is contained within the boundary of NSP 65. The NSP states that development here should provide new homes, retail, community uses, employment floorspace as well as strategic public open space including the Surrey Canal linear park. In addition, it states that development should reinforce the high street and provide a new part of the town centre.
92. Again, acknowledging its very limited weight, draft OKR AAP Policy AAP 7, Town Centres, Leisure and Entertainment, identifies the site as falling in a district centre and identifies the uses that would be appropriate, including retail, community, leisure, cultural and offices above shops. Draft policy AAP6, Business and Workspace – The Bow Tie, requires an innovative mix of uses including light industrial, offices, manufacturing, distribution and creative workspaces.
93. It is clear therefore that emerging policy and the existing evidence base for the Old Kent Opportunity Road area support mixed use development and the designation of the Old Kent Road as a high street and town centre. Nonetheless, and in recognition of the limited weight of this emerging policy, the applicant has carried out a sequential test and retail impact assessment of the proposed development.
94. The applicants' sequential test demonstrates that the proposed retail/leisure/office floorspace would be unlikely to have a material adverse impact on any nearby town centre including the town centres at Elephant and Castle, Peckham and the district

centre at Camberwell. This is because of the following factors:

- The application site is the most sequentially preferable to accommodate the proposed development. The 'main town centre' uses are an integral part of the proposed development. There are no other 'available' sites that are of a sufficient scale to accommodate the development, even when applying a significant degree of flexibility to its format and scale.
- The proposed development would result in a net reduction in the amount of retail floorspace at the application site. The effect of the development is likely to be a reduction in the retail turnover generated at the application site. This would have the effect of reducing the level of economic impact of the proposed development on any defined centres through a correlating reduction in the level of trade diversion.
- The proposed floorspace would maintain the established retail function of the application site. The new, smaller retail and leisure premises proposed within Block C would primarily serve a localised catchment, including the residential and business communities. The proposed floorspace would not divert shoppers or visitors away from the three defined centres included in the submitted assessment.
- Given the quantum and the anticipated role and function of the retail and leisure floorspace, the proposed development is not anticipated to trigger closure in any other "in town" stores given the likely reduction in turnover at the site;
- Furthermore, the proposed development would not have any impact on existing, committed or planned investment in any defined centres. Conversely, the proposal would facilitate significant private sector investment would deliver physical and economic regeneration of the application site.

95. It is therefore considered that the site is the most preferable site to accommodate the proposed development and the proposals are considered to comply with the sequential approach to development as required in the Core Strategy and the NPPF.

Retail floorspace

96. The proposal would result in the loss of approximately 3,497 sq.m. of retail floorspace. The existing retail units with extensive surface car parking represents an inefficient use of this out of town centre brownfield site and its loss does not raise any strategic concerns.
97. An overall uplift in commercial floorspace of 4,588sqm would be achieved whereby 2228sqm is retail, 5659sqm is office and 2336sqm is flexible floorspace (all in Block B) with a further 596sqm of flexible space proposed for Block C (total 10,819sqm).
98. So, whilst the existing land use is not replicated, the flexibility of different Use Classes in this scheme enhances the development from a town centre perspective. As the new floorspace would provide a mix of retail, offices as well as a cultural destination space, this combines to reinforce the role of Old Kent Road as a town centre and significantly increases the intensity and number of employment opportunities available. Therefore the land uses of this development are supported.

Independent retail

99. Draft NSP Policy 28 and London Plan policy 4.9 Local Shops state that development must incorporate well designed and flexible units suitable for small and independent businesses. It has been agreed with the applicant that the two commercial units in Block C would be secured for smaller companies who currently have no more than three retail outlets, so as to ensure they would be recognisably independent, with a marketing strategy to attract these smaller independent companies. This would ensure that the development would offer a different kind of retail/commercial use.

Re-instatement of frontage to the Old Kent Road

100. The proposed layout of the site would re-establish a traditional “high street” frontage along Old Kent Road in accordance with the draft OKR AAP aspirations. It has been designed to accommodate at least two of the existing tenants in replacement units such that local retail provision is maintained. The retail units in Block B would benefit from direct access to and use of the enclosed yard at ground floor level which would be accessed from Olmar Street. 18 shared customer car parking spaces would be provided for these units at basement level.
101. Additional “high Street” commercial floorspace proposed at the base of Block C. This would help to activate the ground floor frontages facing Old Kent Road as well as the proposed Surrey Canal park and Urban square.

Offices

102. The scheme includes the provision of up to 7,995sqm of office floorspace which would be provided at the upper levels (3-11) within Block B (5,659sqm), fronting onto the Old Kent Road, and could also include the destination space use if that were to be provided as offices (2,336sqm). The offices would have a dedicated and direct access via an entrance lobby accessed from the Old Kent Road. The commercial use of this space reduces the potential for single aspect flats facing onto the Old Kent Road.
103. The GLA, in their stage 1 report have noted that the proposed office floorspace would currently sit outside of a designated town centre and outside of the designated Central Activities Zone where both the London Plan and draft London Plan direct large scale office developments. GLA officers have concerns about the quantum of office floorspace currently proposed and have asked that the applicant demonstrate authoritative, strategic and local evidence of sustained demand for office activities in this location and that the office space would not have a negative impact on the nearby CAZ within the Bankside, Borough and London Bridge Opportunity Area.
104. The 7,995sqm is the maximum level that could be delivered should the ‘destination space’ in Block C be used primarily as an additional ‘office’ location. It is not anticipated that this would be realised given the configuration of the space and current operator demand for that space.
105. To provide greater comfort to the GLA that the level of office provision is consistent with the emerging allocation as a ‘District Centre’ the applicant is happy to accept a condition that would require the submission of an additional evidence should more than 5,659 sq. m (GIA) is used primary as an ‘office’ within Class B1(a). The condition would be worded as follows:

'If the quantum of floorspace used primarily as offices within Class B1(a) exceeds 5,659 sq. m (GIA), the Applicant must submit an 'Office Floorspace Assessment' for approval prior to 'occupation'. The Assessment must include information on supply and demand and any potential impacts on the policy objectives for the CAZ within the Bankside, Borough and London Bridge Opportunity Area.'

106. The primary office floorspace proposed at the application site (5,659 sqm) is not expected to generate any adverse effect on established office locations or strategic regeneration objectives including the CAZ and Opportunity Areas.
107. In addition to a significant growth in new homes, the draft OKR AAP seeks to create up to 10,000 jobs. The proposal seeks to respond to these aspirations by maximising the potential for growth delivered by the regeneration which would include considerable improvements to transport infrastructure.
108. The development accords directly with the land use framework identified in the draft AAP OKR Policy AAP6 which seeks to create the highest density employment space in two central cores. The application site forms part of the southern 'core' and is therefore the most appropriate location for office floorspace within the AAP.
109. The Southwark Employment Land Study (January 2016) forecasts that there will be projected growth for some 400,000 sq. m of B1 space over the period to 2036. Of this, the study forecast growth of 90,000 sq. m of B1 floorspace over the period 2014-36 for the CAZ Hinterland.
110. The Old Kent Road is identified to form part of the CAZ Hinterland within the Southwark Employment Land Study (January 2016). The Study notes that, whilst the Old Kent Road Opportunity Area is not viewed as a Grade A office location (based on current supply and demand), it would be appropriate for some B1a activity to form part of the mix of uses upon redevelopment.
111. The scale of the office floorspace proposed (up to 5,659 sqm) is not considered sufficient to trigger any changes to strategic locations such as the Bankside, Borough and London Bridge Opportunity Area. Furthermore, it is anticipated to perform a more localised or 'secondary tier' function when compared to more strategic and established locations within the CAZ.
112. The office floorspace proposed at the application site is consistent with the emerging policy allocation which includes identification as a district centre.
113. It is therefore considered that the proposed offices are appropriate in land use terms and the condition would provide the necessary evidence to support the proposed office floorspace. Should the level of supply exceed 5,659 sq. m (GIA), then a more detailed assessment including the stipulated evidence would be submitted for approval.

Destination space

114. The scheme includes the provision of 2,800sqm of flexible commercial space as a "destination space" which would occupy floorspace at basement, ground and first floor levels within Block B. The space could be occupied by a cultural space such as a theatre or cinema, but also has flexibility to incorporate retail uses such as B&Q which is discussed further at paragraphs 116 - 118, or a combination of both.

115. Saved Policy 1.11 of the Southwark Plan states that planning permission for new cultural facilities would be granted where they meet the following criteria:
- a) Where the character of an area within a Strategic Cultural Area is not unacceptably compromised; and
 - b) Outside the Strategic Cultural Area, where the activity does not have a significant detrimental effect on the environment or local amenity, and has good public transport accessibility; and
 - c) All new visitor attractions will be expected to provide and implement a visitor management strategy to mitigate local impact on amenity.
116. The site is considered appropriate and acceptable for a culture use. The main entrance is located from the public square, with plenty of circulation space to enable visitors to arrive safely. Further, the draft OKR AAP and NSP allocations support the cultural use. Conditions would be added to control opening hours and dedicated servicing provision has been made for this facility from the service yard at ground floor level.
117. The applicant has been in discussions with a number of potential operators who have expressed an interest in accommodating some or all of the destination space. The key function of the destination space would be to generate activity both day and night time by providing a facility or attraction for the existing and new residential and business community. This might include a theatre, cinema, other commercial leisure operation or even B&Q, which is discussed later in the report. It would be directly accessible from the proposed urban square and the linear park.
118. To maintain flexibility and maximise the potential to secure the most appropriate end user for the floorspace, the applicant wishes to seek flexible permission for uses within Classes A1, A3, B1(a), B1(b), D1, D2 and / or Sui Generis (Theatre).
119. The destination space is welcomed and is considered as a positive benefit of the proposals, attracting the existing community as well as the new residents and workers.

Business relocation and retention

120. Due to the highly constrained site and the retail park nature of the existing uses it is not feasible to maintain operation of the uses on site during the construction period. As previously mentioned, the application site is currently occupied by three tenants: B&Q, Halfords and Pets at Home. Pets at Home and Halfords have been confirmed to be re-provided at the site following completion of the development, albeit in a high street format; this is very positive. In respect of B&Q, a response to their objection to the scheme and whether they could be re-provided is considered in the following paragraphs. Their current store provides 105 jobs, with the vast majority of these (70%) part time which includes peak time only shifts (e.g Saturdays and /or Sunday). The applicant estimates that the FTE (full time equivalent) jobs at the store would be 38-40.
121. The consultation response from B&Q does not object to the residential-led redevelopment of the site. B&Q state however that provision must be made to retain the existing retail floorspace at ground floor level to achieve the aspirations of the draft OKR AAP. Unfortunately it would not be possible to deliver the objectives in terms of redevelopment and retain large format, retail warehouse premises with associated car

parking.

122. The draft OKR 10 allocation establishes the aspirations in terms of land use, format and configuration. It specifically states that the area is currently fragmented due to the built form and that the retail park is 'out dated'. In its own response, B&Q quotes the aspiration of the draft OKR AAP in respect of repositioning the commercial floorspace and function which is:
'Over time we expect retail provision on the Old Kent Road to evolve with "big box" retail sheds being replaced by high street type stores.'
123. In respect of the OKR10 allocation, the policy explicitly states that redevelopment must replace the existing retail floorspace with active frontages along the Old Kent Road.
124. It would not be possible to re-provide a retail warehouse of the scale of the existing B&Q (c4,000 sqm) with associated car parking and meet the wider policy objectives to deliver new homes, jobs and public spaces.
125. The proposed development would retain large format retail uses, designed to meet the future requirements of other existing operators at the application site (i.e. Halfords and Pets at Home), as well as introducing new, smaller commercial premises. The smaller commercial premises would include a range of new retail, service and leisure uses and would activate frontages on Old Kent Road and fronting the new linear park and public square. These premises would be suitable for a range of national, regional and independent operators.
126. The loss of B&Q from the site would have some impact but there are alternative facilities that can meet the requirements of the residential community. The local area includes a range of national multiples (e.g. Toolstation, Screwfix4, Selco, B&M, Plumb Centre, Argos and Carpet Right) and independent operators (e.g. DIY Station, New Hardware Centre (117 New Cross Road), Camberwell Superstores and Brewers Decorator Centre) that provide DIY goods or services. B&Q has alternative premises in: Greenwich, Sydenham and West Norwood and Wickes has comparable stores in Blackheath and Catford. The retained provision combined with the opportunity for 'online' sales and home delivery or 'click and collect' services means the retail provision is not considered to be materially affected.
127. Overall, the proposed development would significantly increase the level of commercial floorspace and mix of uses at the application site. It would be a catalyst for the transition of the Old Kent Road from a fragmented, car dominated environment to a more cohesive and traditional 'high street' form which would support the emerging allocation of this area as a district centre.
128. Irrespective of the above, the applicant is aware that B&Q has been operating from the Old Kent Road for a number of years. In light of this, B&Q have agreed a revised lease which would allow them to operate from the site for as long as possible before redevelopment commences. B&Q has accepted the terms of this new lease which was completed in 2018.
129. Furthermore, following conversations with officers, the applicant has agreed to continue to explore the opportunity to accommodate B&Q within the new development scheme, before the space is offered or marketed to any other occupier. There is no end user formally agreed for the 'destination space' proposed within Block B which could provide an opportunity if B&Q is willing to consider a smaller format store in this

location. This could be in the form of their “Best of B&Q” city format store on Holloway Road, which would allow the remainder of the destination space to be a community facility (e.g theatre, cinema).

- 130. The ‘destination space’ has been designed with as much flexibility as possible in terms of floorspace configuration and land use, and also includes direct servicing access. The flexible uses for the space includes provision for retail within Class A1 and therefore there is no requirement to change the development as submitted. Options could be explored with officers for a small format retail premises to be incorporated within the area alongside other operator demand. The most appropriate mix of land uses can then be delivered within the application site to meet the aspirations of the draft OKR AAP and the requirements of the local community.
- 131. Further, the applicant has written to B&Q directly, welcoming a conversation to discuss their requirements and a potential store format that B&Q could operate from this part of the site. It is understood that a meeting between the applicant and B&Q is to take place shortly to look at potential options.
- 132. It is therefore positive that the applicant is willing to explore opportunities for B&Q to be re-provided at the site following the redevelopment, subject to them considering a different store format, and the applicant has agreed that B&Q can be offered the space on a first refusal basis, at normal market rates. It is recommended that a full business retention plan be secured by legal agreement.

Job Creation

- 133. The proposed development would contribute to local employment during both the ‘Demolition and Construction’ and ‘Completed’ phases. In the construction phase, it is estimated that there would be 157 full time equivalent positions over a 72 month construction period.
- 134. It is estimated that the proposed development would generate between 431 – 580 FTE positions which is an increase over the existing 59 no of jobs (FTE).

Table: Employment uplift

Use		Floorspace sqm	Employment density/benchmark	Full time equivalent (FTE) jobs	
				Min.	Max.
General office (Class B1a)		4,810 NIA	13m2 per employee	370	
Retail (Class A1)		1,894 NIA	90sqm per employee	21	
Flexible Commercial (Class A1, A2, A3)	A1/A3 High St/ Food store/ restaurants/ cafes	338 NIA	17.5sqm per employee (15-20sqm)	19	
	A2 Financial/professional services	169 NIA	16m2 per employee	11	

Flexible destination*	Communal Dining Hall & Associated Retail A1/A3	1,985 NIA	17.5m ² per employee (15-20m ²)	113	113
	Cinema Class D2	2,336 NIA	200m ² per employee	12	12
	Theatre/Concert Hall (D1/D2)	2,336 NIA	225m ² per employee (Small theatre 350m ² / Concert venue 100m ²)	10	10
	Educational Co-working Space D1	1,985 NIA	12.5m ² per employee (10-15m ²)	159	159
Total				431	580

Note: *NIA/GIA have been used in line with assessment methodology in the Employment Density Guide published by the HCA, and conversions have been used where necessary.

135. There is a net gain of up to 521 jobs which is a significant positive aspect of the scheme.
136. In addition to the increase in the number of jobs proposed, the applicant has also agreed to accept an obligation in the S106 to ensure employees in the proposed development, as well as during construction, are paid the London Living Wage.

Affordable Workspace

137. The applicant has proposed 10% of the office floorspace as affordable workspace, amounting to 566sqm, which is a positive benefit of the proposals. The applicant has consulted the council's "Workspace Provider List" and has already engaged with potential providers in respect of future demand and potential requirements. The rent would be at £18-£24 per sq ft to the end user (excluding service charges would be subject to a cap), which would make the rent affordable to start up firms, small businesses and creative industries. The affordable space would be offered to existing Old Kent Road businesses first, to provide direct benefit to the existing business community.

Provision of housing, including affordable housing

138. The provision of up to 1,113 new residential units result in a significant development that would assist in achieving housing targets set out within the draft OKR AAP. 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, NSP and draft OKR AAP. The proposal would make a sizeable contribution to the borough's housing stock and combined with a policy compliant affordable housing offer; this is considered

to represent a significant positive aspect of the scheme.

Provision of a new park

139. In line with the requirements of the draft OKR AAP, the development would deliver a significant contribution to the new linear park envisaged between Burgess Park and Verney Road, roughly along the alignment of the former Grand Surrey Canal. The provision of this park would be a significant improvement over the existing tarmacked site. In order to ensure consistency along the linear park, the landscape proposals for this development need to be carefully coordinated with those of the neighbouring sites. There have been a number of meetings with adjoining landowners to ensure that this is the case.
140. The park would be capable of linking with the linear linear park proposed as part of the approved Nye's Wharf scheme and submitted Malt Street scheme which would provide a continuous route along these three separate sites.

Image: Landscape plan



141. One of the changes being made to the draft OKR AAP is that an additional park space off the linear park would be provided on the council's Frensham Street depot site, to create a south facing park space approximately the size of Bird in the Bush Park (1.5 hectares). Ideas for the use of the park could be developed with the local community and could include a multi use games area and allotment space for growing food and the council providing tools for gardening. This additional park space would adjoin the linear park being provided as part of the scheme with maintenance shared by all developers who own land in the linear park.
142. It is recommended that the delivery of the park be secured as part of the legal agreement to secure the timing for its delivery, access by foot and by bicycle and sustainable drainage. The detailed design of the landscape for the park should be

reserved by condition. The legal agreement should also include clauses relating to maintenance. When two adjoining landowners have completed delivery of the linear park, a linear park management company should be established to run and manage the park, similar to the Nine Elms Model in Vauxhall, with details to be secured by the legal agreement.

Prematurity

143. The most up to date development plan pertinent to the Old Kent Road area is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing led growth. The OKR AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the New London Plan aspirations for industrial land and employment are addressed. This scheme is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London plan and the direction of travel of the draft New Southwark Plan and the 2016 and 2017 draft AAPs and the 2018 draft New London Plan. It is not therefore considered too be premature.
144. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance “arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:
- (a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
 - (b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
145. Refusal of planning permission on grounds of prematurity will seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.”

Conclusion on land use

146. There are major regeneration benefits of the scheme including the provision of new park space, the new active frontages along the Old Kent Road, the destination space, job creation, the provision of good quality, flexible commercial space including affordable workspace, a sizeable contribution to the borough’s housing stock and a policy compliant level of affordable housing. Pets and Home and Halfords would be re-provided following the redevelopment with an option for B&Q also to remain which is very positive. For these reasons, officers consider that the principle of the proposed development in land use terms should be supported. In relation to town centre uses, it

is considered that whilst the proposed development would introduce main town centre uses outside a currently designated town centre, the proposals would comply with the tests set out in the NPPF and emerging policy and that this would not be to the detriment of other designated centres.

Environmental impact assessment

147. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations and constitutes EIA development having regard to its potential for likely significant environmental effects.
148. Prior to the submission of the planning application, the applicant requested 'Scoping Opinions' under Regulation 13 of the EIA Regulations to ascertain what information the Local Planning Authority considered an Environmental Statement (ES) should include (ref: 18/AP/1913).
149. 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, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
150. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. 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
 - Air quality
 - Noise and vibration
 - Wind microclimate
 - Daylight, sunlight and overshadowing
 - Cumulative effects
 - Townscape, Heritage and Visual
151. In assessing the likely environmental effects of a scheme, the ES identifies the existing (baseline) environmental conditions prevailing at the site, and the likely environmental impacts (including magnitude, duration, and significance) taking account of potential sensitive receptors. It further identifies measures to mitigate any adverse impacts, and a summary of potential positive and negative residual effects remaining after mitigation measures is included.

Alternatives

152. The EIA Regulations require an ES to include an outline of the main alternatives considered by the Applicant, indicating the main reasons for the choice made, taking

into account the environmental effects. The applicant has considered the following alternatives:

- The “do nothing” alternative
- Alternative sites; and
- Alternative designs and design evolution.

153. The “do nothing” alternative would mean the site left in its current underutilised condition resulting in no delivery of housing or employment opportunities, no improvement in local connectivity or permeability, no improvement in public realm or open space and no improvement in biodiversity and sustainability.
154. Alternative sites were not considered as the applicant is the owner of the site and sites owned by third parties were not given consideration. Further, the site is specifically allocated in the draft OKR AAP as a proposal site for redevelopment which would contribute to meeting the boroughs housing needs and employment contribution.
155. In terms of alternative designs and design evolution, various layout arrangements for the tall buildings were explored. Their relationship with each other was looked at as well as the developing massing of both the Malt Street and Civic Centre proposals. The façade and materiality options were considered during the design evolution process. Overall, it is considered that the alternatives have been appropriately explored.

Cumulative impact assessment

156. The submitted ES includes an assessment of the proposal as well as relevant “committed schemes” such as those including Ruby Triangle and Nye’s Wharf, as well as the development envisaged by the draft OKR AAP. The applicant has used a virtual model (to assist with matters such as views, daylight, sunlight and overshadowing) and a physical model (to analyse the effects of wind microclimate) for the site allocations in the AAP to ensure that due regard is had to land adjoining the application site and within the wider locality.
157. The applicant has also worked collaboratively with adjoining land owners (including those promoting developments at Malt Street and the Civic Centre to ensure the development of separate sites within the emerging OKR10 allocation are cohesive. It has ensured that public areas, access and land uses are aligned to maximise permeability and the quality of the future environment.
158. The cumulative impact of assessing the impact of the proposal, together with committed schemes and the draft OKR AAP masterplan can be found in relevant sections of the report.

Conclusions of the Environmental Statement

159. The ES notes the significant beneficial impacts of which include the provision of 1,113 new dwellings in Southwark and the provision of up to 580 jobs. The conclusions of other matters of the ES, such as daylight, sunlight, wind and townscape impacts are discussed later in the report, in the relevant sections.

Affordable housing

160. The proposed development would provide 35.48% affordable housing with an overall tenure split 69% social rented and 31% intermediate housing. When measured at 35%, the development would provide 70% social rented and 30% intermediate, with the additional habitable rooms as intermediate housing. In total, 237 new social rented homes and 126 shared ownership intermediate homes would be provided.
161. The Southwark Plan saved policy 4.4 requires at least 35% of all new housing as affordable housing. Of that 35%, there is a requirement for 50% social housing and 50% intermediate housing in the Old Kent Road Action Area. The adopted London Plan 2017 sets a strategic requirement of 60% social housing and 40% intermediate housing. The emerging New Southwark Plan sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% intermediate housing to be provided, this equates to approximately 70% social housing and 30% intermediate housing. As such, the proposed development is in accordance with the emerging New Southwark Plan.
162. The requirement for social housing set out in the New Southwark Plan is higher than the London Plan and the saved Southwark Plan policy given the acute need for social housing in Southwark. Approximately 57% of the borough's total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute affordable housing need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions. Overcrowding is strongly related to poor physical and mental health and can strain family relationships. Children in overcrowded homes often achieve poorly at school and suffer disturbed sleep. Social rented housing is vital to social regeneration as it allows residents who cannot afford suitable market housing to remain close to their families, friends and employment. For this reason emerging Policy P1 of the New Southwark Plan requires a minimum 25% of homes to be provided as social rented housing which the proposed development complies with.
163. In total, 3,280 habitable rooms would be provided in the development. The development would provide a total of 1,164 affordable habitable rooms which would equate to an overall provision of 35.48%. The level of provision would achieve the minimum target of 35% and is therefore fully policy compliant and a positive aspect of the scheme.
164. With regard to tenure split, out of the 1,164 affordable habitable rooms, 804 would be social rented (69%) and 360 would be intermediate shared ownership (31%). This is slightly out from the 70% social rented and 30% intermediate split required but when measured at 35% (1,148 affordable habitable rooms), the tenure split would equate to 70% social rented (804 habitable rooms) and 30% intermediate (344 habitable rooms), with the additional 0.4% habitable rooms (no. 16) as intermediate.

Table Affordable housing

Tenure	Units		Hab rooms	
	No.	%	No.	%
Total	1,113	100	3,280	100
Private	750	68	2,116	64.5
Social rent	237	22	804	24.5
Intermediate	126	12	360	10.9

165. The affordable housing proposed would be provided in Block A and Block B.

Image: Tenure diagram

4.11 Tenure Diagram



166. A section 106 agreement is recommended to secure the delivery of these units, including a clause preventing more than 50% of the private units from being occupied until the affordable units have been completed. In line with the Mayor's Affordable Housing and Viability SPG, an early review mechanism would be secured by the Section 106 agreement, which would come into effect if the development does not substantially commence within 24 months. The review would determine whether the viability of the development has improved during that time, and accordingly whether it could deliver any more affordable housing. The review would be an upwards only review with the 35.48% guaranteed.

167. A contribution of £48,043.05 (a charge of £132.35 per unit) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the legal agreement.
168. In conclusion, the level of affordable housing is considered fully policy compliant and is a positive aspect of the proposals.

Development Viability

169. Southwark's Development Viability SPD requires a financial viability appraisal to be submitted for all planning applications which trigger a requirement to provide affordable housing. The financial viability appraisal should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements.
170. This application is therefore accompanied by viability report, which was reviewed by independent consultants on behalf of the council. A later addendum report was submitted to address the changes from switching from London affordable rent to Southwark social rents.
171. The applicant's affordable housing offer is 35.48% affordable by habitable room, with an overall tenure split of 70% social rent and 30% shared ownership at 35%. Savills' Argus appraisal of the scheme, with this level of affordable housing, shows a negative residual land value of -£64.48m which leads to a viability deficit of -£104.38m once the £39.9m benchmark land value is accounted for. This is a substantial deficit and is equal to 20% of the scheme's total GDV, thus clearly a substantial rise in GDV and/or fall in development costs would be required in order to overcome this deficit and reach a break-even position.
172. It is unrealistic to expect the applicant to proceed with the scheme based on the appraisal results shown in Savills' viability assessment, as this shows a very substantial negative residual land value. It is therefore likely that the applicant has a more optimistic view of present-day scheme viability than Savills (in respect of values and/or costs), or is factoring in expectations of future improvements in viability.
173. The council's independent consultants tested the viability of the scheme with higher residential pricing. The applicant has adopted £731.18 per sq ft which the council's consultants consider to be low. At £800 per sq ft for the private residential this changes the residual land value from -£64.5m to -£33.5m, thus still a negative figure. The council's consultants have suggested a reduction of the profit on private GDV from 20% to 17.5%, and a reduction in the profit on the retail (Class A1) to 10% on GDV, which would lead to a further £12.5m improvement to the residual, although this clearly still leaves the scheme in deficit.
174. The council's consultants have further viability tested the appraisal, by increasing the private housing values to £850 per sq ft. reducing the build costs by 10%, and then reducing the blended profit down from 18.09% to 12% on GDV, which is the point at which the residual land value reaches £39.9m and therefore is a breakeven position against the £39.9m benchmark. Whilst this profit is below typical levels adopted in viability assessments, the tone of land sales per plot of development sites suggests that developers are bidding on the basis of lower profit targets than have become the norm to be accepted in planning negotiations.

175. The applicant has stated that accepting a profit of 12% is something that they could not accept, which reinforces the position that the applicant is reliant upon growth in private residential sales in order to achieve a viable scheme.
176. The scheme includes the provision of a large number of amenities, including the public spaces at ground floor level. These provisions would help it to exceed the value of comparable schemes nearby. The site would also benefit from the wider regeneration of the area, including the Bakerloo Line extension, which would boost sales and have a major impact on the area. Consultation on the BLE has been undertaken and completed and construction could start in 2023 and thus would not be far away to directly benefit from increases in residential pricing.
177. As such, on the basis of the adjustments that the council's consultants have made to the appraisal, they conclude that the scheme can support 35.48% affordable housing on a policy compliant basis, which would be reliant on achieving higher sales values. The 35.48% affordable housing offer is therefore considered deliverable on this basis, and terms to secure the affordable housing would be included in the legal agreement.

Grant funding

178. The applicant has undertaken some analysis to consider whether it would be viable to increase the quantum of affordable housing to 40%, from 35.48%, if grant funding were to be available. The applicant has also undertaken consultation with three Registered Social Landlords.
179. The applicant has assumed that 35% affordable housing by habitable room would equate to 33% by unit, and accordingly 40% affordable by habitable room would notionally equate to 38% by unit.
180. Assuming that the additional 5% affordable housing would be provided as shared ownership, the Gross Development Value (GDV) of the private housing would decrease by c.31.5m and the GDV of the affordable housing would increase by c.£12.5m. On the basis that £28,000 grant would be available for all intermediate units, and £60,000 grant would be available for all rented units, there would be c.19.5m of grant funding available, and therefore the GDV would approximately breakeven.
181. In order to deliver the scheme, the applicant is dependant on the ability to achieve an increase in income over time. Since affordable housing values are relatively static, being related to the rent levels (for Southwark social rent which is lower than the London affordable rent levels promoted by the Mayor of London) and income caps (for shared ownership), there is less opportunity to secure increases in value. Delivery of the scheme is dependent on increased income from market sales.
182. The applicant has therefore stated that providing additional affordable housing from using grant funding would preclude opportunities to recoup the deficit through increases in the value of the private housing as the viability position would further worsen by providing even lower cost rented accommodation as required by Southwark policy. They therefore conclude that providing additional affordable housing with grant funding is not viable in this instance.

Design, layout and impact on townscape views and heritage assets

183. 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, character and townscape, local and strategic views and resultant streetscape. 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 set out design requirements for tall buildings, all of which are discussed in further detail in the following paragraphs.
184. The emerging design policy in the New Southwark Plan includes P12, Design Quality and P14 Tall Buildings. P12 states that development must provide, amongst other things, high standards of design with appropriate fabric, function and composition. P 14 sets out a series of tests for tall buildings (defined as significantly taller than surrounding buildings or their context). It also states that the highest tall buildings will be located in areas where there is the greatest opportunity for regeneration, including opportunity Areas, such as the Old Kent Road.

Site Layout

185. The proposed site layout would comprise three blocks (referred to as A, B and C) laid out around a series of open spaces and improved connections through the site. Each block would contain a tall building, the heights of which would increase from three storeys in Block A to 48 storeys in Block C. The tall buildings are placed at the periphery of the site (to the south east, north east and north west), with generous separation distances between them, forming a comfortable grouping. The tallest would mark the entrance to the new linear park from the Old Kent Road. Each tall building would be set amongst lower buildings, defining the edges of the open spaces proposed.
186. The total amount of public realm at ground floor would be 5,605sqm. This would form a generous contribution to the proposed linear park required by the draft Old Kent Road AAP, a new public square off the Old Kent Road and new streets running through the site. For residents, there would also be a new at grade play space at the heart of Block A and new podium level amenity spaces within Block B. Smaller roof top amenity spaces are also proposed throughout the development. Well designed breaks in the massing of the podium layout proposed for Block B would ensure good levels of daylight and sunlight to the open space on the podium, and views out from the courtyard at the heart of Block A.
187. The ground floor layout would be outward-looking, with active frontages along Old Kent Road, Olmar Street, the new streets and open spaces proposed within the development. The existing frontages along this part of the Old Kent Road and Olmar Street are currently very inactive, dominated by surface level car parking for the large retail sheds on the site. This would be vastly improved with the introduction of retail,

office and residential uses at the back edge of widened footways in these locations. The new public square would include an entrance to a potential new 'destination use' (such as a cinema or theatre) over three floors. This would give the new public square a clearly defined sense of purpose, encourage visitors in off the Old Kent Road and could inform the programming of the space itself. Block C would feature an innovative 'through lobby' that would open onto the new public square on one side of the building and linear park on the other. This connection between the two spaces would enhance the sense of place, whilst still ensuring that each still benefits from clear definition, vibrancy and activity along their edges. The shop front design fronting onto Old Kent Road would contribute to the reinstatement of a high street character of the area, as envisaged in the draft OKR AAP. A condition requiring a shop front design strategy is recommended to ensure that all necessary details, including signage and lighting, are considered and delivered in a high quality manner.

188. Where it is proposed that residential uses would be brought to ground floor level, each unit would be given its own front door onto the street and defensible space adjacent to the footway. This would result in a variety of street character throughout the development, with appropriate levels of activity on each. The ground floor design of the residential uses would also ensure good natural surveillance and a pleasing sense of rhythm and proportion. The proposed defensible spaces would ensure sufficient privacy without compromising the sense of enclosure or overlooking. Within the residential component of the scheme there is a good mix of houses and apartments, including some very innovative 'back to back' houses in Block A. This variety is considered a very positive aspect of the scheme.
189. The only area of relatively inactive frontage would be to the rear of Block B, fronting onto Olmar Street. This space is required for access to the covered service area and bin storage. It is not at the base of the tall building and represents a very small proportion of the proposed frontage, so it is acceptable given the benefits of providing covered off street servicing. Along other frontages, the bin stores and other service functions are discretely located so as not to have a negative impact on the street frontages.
190. In addition to the new open spaces, enhanced public realm and active frontages, the proposed site layout would also represent substantially increased connectivity and permeability for the area. At present, the site is completely impermeable, with no connections into the wider area other than the entrance to the car park. This results in a particularly hostile environment for pedestrians. The proposed layout would introduce new connections into the site in line with anticipated pedestrian desire lines from Old Kent Road, the linear park and Olmar Street. The new linear park would be for pedestrians and cyclists only, with both east-west and north-south connections proposed. There would be thoughtfully designed access for emergency vehicles.
191. The site layout has been developed with full and careful consideration of other emerging development proposals on neighbouring sites. This is particularly pertinent for Block A, which shares a boundary with the Malt Street proposals (Ref 17/AP/2773). The layout of Block A incorporates a courtyard at its centre, and apartments to the west that would screen the rear of the Malt Street proposals. Facing these, on the other side of the courtyard would be a terrace of back-to-back houses, giving intimate enclosure to the courtyard and good levels of overlooking and natural surveillance.

Image: Ground floor plan



Height, Scale and Massing

192. The proposed massing strategy places the tallest building (in Block C) at the junction of Old Kent Road and St James's Road, at the heart of the draft OKR AAP's 'Stations and Crossings' strategy and at the entrance to the linear park. It would be 159.05m in height (162.1m AOD) comprising 48 storeys. The other two tall buildings proposed would reduce in height in an anti clockwise spiral around the periphery of the site. So the second tallest, in Block B, would be on the corner of Olmar Street and Old Kent Road. This would be 124.4m in height, comprising 37 storeys. The third tall building, in Block A would be 88.7m in height, comprising 26 storeys. Between the towers, the heights of building would be up to 12 storeys, establishing a comfortable human scale to the street frontages.
193. The heights of the three tall buildings would mark a step change in the scale of the surrounding area. The massing strategy is however in line with the emerging policy set out in the draft OKR AAP (acknowledging its very limited weight), The adopted London Plan (2016) and the Southwark Core Strategy and Southwark Plan. The tall buildings have been arranged to allow for as much space between them as possible, ensuring that they would not appear to coalesce when viewed from a distance. This also ensures that good levels of sunlight and daylight would reach the public realm. The relative heights and the way in which they would be distributed across the site would result in a well articulated composition of towers defining the new public realm proposed and serving an important landmark role identifying the entrance to the linear park and the location of a new civic square and potential destination use.

Image: Height and massing visualisation



194. In line with the draft OKR AAP's 'Stations and Crossings' building heights strategy, the tallest of the towers would signify the "principle crossing in the city structure where the main roads from Peckham to Canada Water and from Walworth to Bermondsey cross the Old Kent Road" and "the point where the new Surrey Canal park [the linear park] crosses Old Kent Road". Also in line with the draft OKR AAP, the design of the tall buildings would be exemplary, with careful consideration of their impact on the skyline. They would have a strong vertical emphasis; well defined bases, middles and tops; and well considered fenestration and detailing that would lengthen as the buildings get taller.
195. As the development would be substantially taller than its existing surroundings, it would be defined as a tall building in the adopted London Plan (2016). Policy 7.7 of the 2016 London Plan, 'Location and Design of Tall and Large Buildings', states that tall buildings should be limited to sites in the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport. Furthermore, London Plan Policy 2.13 requires development in Opportunity Areas to optimise residential and non residential output densities, meet or exceed minimum housing and employment guidelines and support wider regeneration objectives. Annexe 1 of the 2016 London Plan sets out the specific requirements for the Old Kent Road Opportunity Area, identifying it as having significant potential for residential-led redevelopment. As such, it is considered that the Old Kent Road Opportunity Area is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. The proposed development is considered to achieve both,

whilst also meeting the other requirements of London Plan Policy 7.7, which are as follows:

- Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;
- Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
- Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
- Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;
- Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;
- Have ground floor activities that provide a positive relationship to the surrounding streets;
- Contribute to improving the permeability of the site and wider area, where possible;
- Incorporate publicly accessible areas on the upper floors, where appropriate;
- Make a significant contribution to local regeneration;
- Not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference; and
- Not impact on local or strategic views adversely

196. It also states that the impact of tall buildings proposed in sensitive locations, including the settings of conservation areas and listed buildings should be given particular consideration. This site is not considered to be within the direct setting of a conservation area; the nearest conservation area is at least 370m from the site. It is however important to note that, given the heights of the buildings proposed, they would be visible from a number of sensitive locations. This is discussed in more detail below, where the submitted Townscape and Visual Impact Analysis (TVIA) is considered. The following paragraphs take each of the other requirements of London Plan Policy 7.7 in turn.

197. The proposed tall buildings would be limited to a site within an opportunity area. The character of the area would not be adversely affected by the scale, mass or bulk of the tall buildings proposed because this area is not generally considered sensitive to change of this type. The 'big box retail shed' nature of the existing townscape character is not worthy of protection, and its replacement with a scheme of this high quality architectural and urban design is considered a significant public benefit of the proposals.

198. The proposed tall buildings would relate well to their surroundings, particularly at street level, with active frontages, increased connectivity and permeability and a series of new public open spaces. The retail and office uses proposed along the Old Kent Road itself would reintroduce the high street character of the area. The urban grain of the area would be significantly enhanced, with the stitching together of existing and proposed streets and open spaces. The sensitively detailed architectural design of the towers, with their use of ceramic tiles (discussed in further detail below) would respond sympathetically to the existing local townscape, whilst introducing a new high quality

aesthetic.

Image: Visualisation from Old Kent Road



199. As a group, the proposed tall buildings would improve the legibility of the area by signifying the principle crossing of the Old Kent Road, the entrance to the proposed linear park and a civic square and potential destination use. As a result of the proposed network of public open spaces, and their relationship with the potential destination use, it is likely that this site would become a focus for outdoor activity, and a place where people are likely to meet and gather. As such, it will become a point of civic significance, as well as an important location geographically in the structure of the city. The design proposed would enhance the skyline and image of London with the three tallest buildings forming a well considered composition of varying heights, each with a strong vertical articulation, striking facades and materiality and well defined 'tops' creating visually engaging silhouettes.
200. The proposals demonstrate the highest standards of architectural design and incorporate the highest quality materials. The elevational strategy and material palettes are discussed in more detail below. In order to secure this design quality, planning conditions requiring detailed drawings, material samples and full scale mock ups are recommended.

201. The positive nature of the ground floor activities, their relationship to the surrounding streets and the vastly increased permeability proposed has already been discussed above. These aspects of the proposals represent significant public benefits. The proposed development would not incorporate any publicly accessible areas on the upper floors, but it is noted, that the London Plan (2016) only requires this “where appropriate”. There would however, be a communal amenity space on the 46th floor of building C1 (the tallest tower). This double height, glazed internal space would also have an external terrace offering views over London towards the West End and The City. It would be a flexible space available for the use of all residents regardless of tenure (to be secured in Section 106 agreement). There is also a proposal for it to be made available to the wider community for a certain number of days per annum, although the applicant has not yet confirmed whether there would be a charge for its use. Again, the details would be secured through the Section 106. A number of roof top gardens for residents of the scheme, as well as the large podium space on Block B would also be introduced at upper levels, giving a soft, green layer of articulation to the appearance of the buildings.
202. The contribution that the scheme would make to local regeneration would be very significant. As has already been identified throughout this report, this would include the provision of significant contribution to the borough’s housing stock, including affordable housing; a significant increase in jobs and new employment spaces; the delivery of a potential new destination space and the creation of two generous new public open spaces, including a generous portion of the linear park.
203. The impact of the proposed development on microclimate, wind turbulence, overshadowing, noise, solar glare, aviation, navigation and telecommunication interference is all assessed in the submitted ES and presented elsewhere in this report. In each case it is concluded that there would be no significant adverse impacts.
204. Finally, it is also considered that there would be no unjustifiably harmful impact on local or strategic views, although as identified below there would be a small number of sensitive locations from which this needs a carefully balanced decision.
205. The draft New London Plan takes a similar tall building policy approach, identifying the Central Activities Zone and Opportunity Areas as suitable locations for tall buildings and setting out similar criteria against which tall buildings should be assessed. It does place a greater emphasis on design review which is discussed later in the report.
206. As the most recently adopted document in the Local Plan, and the only document adopted after the Old Kent Road was designated as an Opportunity Area with significant potential for residential-led redevelopment, it is considered that these London Plan (2016) policies in relation to tall buildings are more relevant than those in Southwark Plan Saved Policy 3.20 dating from 2007. Nevertheless, the proposed development has also been assessed against the requirements of this saved policy. Saved Policy 3.20 requires any building over 30 metres tall to ensure that it:
- Makes a positive contribution to the landscape; and
 - Is located at a point of landmark significance; and
 - Is of the highest architectural standard; and
 - Relates well to its surroundings, particularly at street level; and
 - Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

207. The proposed development would make a very positive contribution to the landscape through the two new public open spaces proposed. The contribution to the linear park is particularly important for the landscape of the Old Kent Road Opportunity Area as a whole, as it would deliver a key portion of the 'greener belt' identified in the draft AAP. New streets and enhancements proposed to existing streets, including Old Kent Road itself would also be a significant positive contribution.
208. The proposed tall buildings are at a point of landmark significance as identified in the draft OKR AAP. As identified above, this significance is generated by the principle crossing in the city structure where the main roads from Peckham to Canada Water and from Walworth to Bermondsey cross the Old Kent Road and the point where the linear park crosses Old Kent Road. The new public square and potential destination use would also make a significant contribution to the landmark significance of this location.
209. As set out below, the proposed development would be of the highest architectural standard and would significantly enhance its surroundings particularly at street level. It would also contribute positively to the London skyline, eventually as part of a cluster of tall buildings following the regeneration of the area.

Architectural Design and Materiality

210. In general, the proposed buildings would be of a mineral, masonry character, referencing the solidity and robustness of the best of the existing architecture found in the area and responding to the design requirements of the draft OKR AAP. The tall buildings would be finished in ceramic tiles, which would fit nicely into this narrative whilst also giving them a unique identity and sense of lightness. The elevational strategy for the development would create a common architectural language across the site, as described in detail below, where each block is described in turn. Interestingly, the scheme has been produced by two different architecture firms working together. This has resulted in a scheme that has a clear sense of unity, but avoids the visual monotony that could have resulted from one architect's hand. The Section 106 would secure the architecture firms to deliver the detailed design of the scheme.

Block A (Alan Camp Architects):

211. Block A would comprise of both low rise elements and a tower. The tower is the lowest of the three proposed at 26 storeys. The low rise elements would consist of apartments and back-to-back houses enclosing the courtyard and fronting onto the street.
212. The tall building would consist of a clearly articulated base, middle and top. The façade would be articulated through a grid clad in ceramic panels that would give a vertical emphasis to the building. The grid would be grouped into three, four, five and six storey high sections separated by horizontal bands. This would lighten the appearance of the building as it gets higher. Further articulation and vertical expression would also be provided by the balcony strategy, which would see projecting balconies arranged in a vertical strip in the middle of three sides of the building (south east and west) and inset balconies on each corner. This strategy is intended to break up the overall massing of the otherwise rectilinear building. Projecting balconies are often discouraged because they can add bulk to a building

form and, if detailed poorly, can have a poor quality 'bolt on' appearance. The projecting balconies here however, would read as the sculptural elements within the façade, running the whole height of the building and using the same framing device as proposed elsewhere, which would ensure continuity and avoid a 'bolt on' appearance. A condition requiring detailed drawings of balconies is recommended to ensure that this is the case. Within the grid, two subtly different ceramic panels would be used to give texture and visual interest. The first would be white gloss finished glazed tiles on the vertical and horizontals of the grid itself. The second would be a grey matt finish panel on the chamfered infills to the grid. The chamfers would slope in from the grid to the windows, giving a sense of depth and robustness to the facades.

213. The use of a ceramic finish for this tower is intended to be read as part of the family of towers, each of which would use ceramics of different textures in order to create a smooth to rough transition. Tower A would be the 'smoothest', with panels as described above. Tower C would be the 'roughest' with a fluted profile proposed to the ceramic panels chosen.
214. The top of Tower A would be expressed as a frame rising above the roof level. This would mask the lift over run and plant, but also provide an expressive silhouette against the sky. The result would be a simple, well articulated tower, with strong vertical proportions. At the base, the materials of the mid part of the tower would be brought to ground, creating a strong corner element. A physical gap is proposed between the tower and the houses within Block A, and it would be separated from the apartment building by a two storey link element. As such it would read as a discrete element within the urban block.
215. The proposed houses would be articulated with a strong rhythm created by repeating three storey projecting bays and framed windows along the terrace. Due to the unique nature of the back-to-back housing, this rhythm can be achieved on both the street and courtyard sides of the buildings. The same architectural language is proposed for the apartments on the other side of the courtyard. This would result in a sense of unity for the block and a consistent character for the courtyard.
216. The low rise elements would be finished in a grey- brown brick with a soft textured finish. Material samples would be required by condition to give comfort that the bricks would be of the highest quality. The same brick is also proposed for the corner elements on Block B (although in a different format). This use of common materials is a subtle way of ensuring a sense of place across the whole development, The windows would be grouped using off white Glass Reinforced Concrete (GRC) surrounds. The same material and similar detailing would be used to highlight the entrance to apartments. Dark grey windows and metalwork (balconies, copings etc.) is proposed, which is intended to contrast to the bronze proposed for Block B.

Image: Block A townhouses



Block B (Alan Camp Architects):

217. This block has been designed as a perimeter block. It would reinstate a high street frontage along Old Kent Road and then create streets and public spaces of subtly differing characters around its other three sides. Above the retail on the Old Kent Road frontage, there would also be office uses, which would be in line with the land use aspirations of the draft OKR AAP. Essentially, the retail units would form a plinth tying the Tower in Block B, on the corner of Old Kent Road and Omar Street, to the mid rise office building that would turn the corner onto the civic square. The potential destination use fronts onto new civic square itself. Away from the Old Kent Road frontage would be the residential components of the block, which would have an architecturally different character to reflect their domestic use. Despite all these uses however, there would also still be a sense of unity across the block, and a familial relationship with Block A opposite.
218. In contrast with the rectilinear tower of Block A, this tower would be hexagonal, with each of its six facades articulated and separated by a winter gardens running vertically up the height of the building. Its elevational strategy though, has much in common with

Tower A. It would be articulated through a clear grid, again with chamfered infills. In this instance however, the grid would be finished in white unglazed, matt ceramic panels and the chamfered infills would be finished in glossy white panels with a gentle 'sine' wave. This is intended to reflect the position of Tower B in the 'smooth to rough' transition. The sine profile on the tiles would be aligned to run vertically up the building, creating subtle shadow lines that would further extenuate its verticality.

219. As with the other tall buildings, Tower B has been composed with a clear base, middle and top. The base would be formed of a triple height entrance lobby, defined by chamfered columns bringing the form of the mid section to ground. Unlike the ceramic above however, white GRC would be used at the base to ensure a robust finish in the more hostile environment of the Old Kent Road. The mid section would be articulated with groups of three, four, five and six storeys defined by horizontal bars. These window groupings would get longer as they rise up the building, again to give a lighter appearance as it gets taller. The top of the building would be expressed as an extension of the grid and chamfered inset panels beyond the roof line on each of the six facades.
220. The triple height retail plinth would be finished in a grey-brown brick, which would be used to set up a rigid, orthogonal grid, in deliberate contrast with the white ceramics of the tower. Along the Old Kent Road frontage, although the shop fronts would be taller than the older shop fronts elsewhere in the Opportunity Area, their rhythm, proportion and detailing would respond to the best of the existing high street character. This language would continue up the building on the corner with the civic square. Above the retail plinth in the centre of the Old Kent Road frontages, the office would be articulated as curtain walling set back behind extruded fins. The intention is that this lighter set back portion of the building would allow the two corner blocks to take prominence.
221. The potential destination space would be expressed with aluminium fins, replicating the language proposed for the set back part of the office building on the Old Kent Road frontage. This would result in the appearance of the different architectural languages weaving in and out of each other, creating a strong sense of place visual interest and identity. There would be a glass canopy over the entrance, creating an open, welcoming public language.
222. The mid-rise residential elements of Block B would form three distinct buildings facing out onto the civic square and the new street. They would also form two defining edges of the communal amenity space on top of the podium within the block. Their materiality would change from the grey-brown brick proposed for the adjacent office building to a buff brick. The intention is that there would be some elements of distinct character for each building, but that they would be tied together with a common brick and bronze metal work and windows. The differences would be expressed through devices such as varying the brick coursing. For example, in one of the buildings the windows would be grouped together with recessed ribbed brickwork, whilst in another ribbed detailing would be used to articulate the top of the building. On one building, the ribbed brickwork detailing is further differentiated by being laid as two courses of recessed brick and two courses of flush bricks repeated. In all the buildings, the brick would be softened by bronze metalwork for the balconies, but in each it would be applied slightly differently. For example, balconies may be expressed as solid or perforated panels adjacent to glazed panes, or as more traditional railings. Where completely glazed balconies are proposed, they would be complemented by bronze balustrade frames, balcony edges and window frames. A tint is also proposed to the glazing. In all of the

buildings, raised parapets are proposed to screen the roof top plant, but in each case the parapets are punched through in a manner that would reflect the window patterns on the floors below.

Image: Block B View from urban square



Block C (Brissac Gonzalez Architects):

223. Block C would consist of a tower and a mid rise element over a retail podium. The tower would be the tallest proposed in the scheme, at 48 storeys. It would also be the most slender and elegant in its proportions. In order to achieve this, the massing would be relatively simple, and the palette of materials would be intentionally limited. The architectural concept behind the sculptural form of both the tower and the mid rise building is the simple idea of chiselling diagonal corners off a square footprint. This was initially introduced in order to widen entry to linear park, but was then applied with rigour to the other corners of the buildings too. The result is two irregular hexagons, each with two ninety degree corners. As a result of the plan form proposed, the tower's vertical slenderness would be emphasised, and internally, there would be greater surface area through which natural light would enter the dwellings.
224. On the northern and southern corners of each irregular hexagon, slightly projecting balconies are proposed. In the tower, the other four corners on each would be expressed as metal reveals, breaking down its perceived massing and leading to it being read as six individual facades rather than one overall form. The material palette proposed for both buildings would consist of off white ceramic panels, with a densely fluted texture. They would be laid according to a staggered pattern that would change the viewer's perception of the buildings depending on whether they were viewed from close up or further away. Perforated folded metal would be used for window surrounds and exposed concrete for the columns at ground floor level. The formwork visible on the exposed concrete columns would run vertically, taking that idea of vertical expression from the scale of the building as a whole and following it through in individual building components. Darker metal cladding would be used for the balconies in order to set up a deliberate contrast. The balustrades would be glass.

225. In the tower, the sizes of the openings would gradually increase with the height of the building to give a particularly successful sense of proportion and an elegant upward sweep to the façade. In the mid rise building, all openings would be equal. Other subtle differences between the two would include chamfered faced openings on the low rise building, with subtly different metal frames. As mentioned above, only the tower would feature the metal corner articulation.
226. There would be a double height, shared entrance lobby between the tower and the mid rise building, which would open onto the public square on one side and the linear park on the other. The two storey podium would also contain retail units, which have been designed to offer active frontages onto both the public square and the linear park. A two storey covered colonnade would surrounds all of the ground floor activities. The design of the columns has been given particular thought, with larger columns beneath the tower. The columns would have the same hexagonal shape as the building footprints and would feature textured, faceted finished. Again, conditions requiring detailed drawings and material samples are recommended to ensure this level of quality is delivered.
227. At pre-application stage GLA officers raised concerns regarding the set back of Tower C from the Old Kent Road particularly the narrowness of footpath width on the outside of the building's colonnade. Officers have worked closely with the applicant and Transport for London to mitigate the impact of the building on the public realm. Mitigation measures such as shopfront and column detailing, building access points and restrictions on street furniture and external trading would be secured along with adoption of all of the public realm/footway on Old Kent Road including the colonnaded section.
228. The final set of amendments now increases the width of the footway from 5900mm to 6100mm and reduces the column obstruction from 1200mm to 1000mm. The effect is to increase the usable width from 4700mm to 5100mm.
229. At the top of the tower, the gridded façade would continue beyond the roofline, with simple openings in place of the windows in the mid section. Effectively, this would become an open screen, shielding lift machinery and terminating the building gracefully at the point at which it meets the sky.
230. The quality of these designs, as described above, is considered to be exceptional and appropriate for the Old Kent Road Opportunity Area. The quality of materials and architectural detailing would be assured by planning conditions requiring detailed drawings, samples of all facing materials and 1:1 scale mock ups of agreed parts of the facades.

Image: Block C view from south-east



Landscaping

231. In line with the requirements of the draft OKR AAP, the development would deliver a significant contribution to the new linear park envisaged between Burgess park and Verney Road, roughly along the alignment of the former Grand Surrey Canal. In order to ensure consistency along the linear park, the landscape proposals for this development need to be carefully coordinated with those of the neighbouring sites. There have been a number of meetings to date to ensure that this is the case. In addition, a linear park management company would be established to run and manage the park, to ensure consistency in maintenance. Additionally, the linear park would link with the additional park space the council would be providing on the Frensham Street depot site.
232. The linear park would run east-west through the full length of the application site. Active uses at ground floor would front onto it, with opportunities for spill out spaces where appropriate. In line with the council's emerging vision for the entire length of the park, it is proposed as a predominantly linear space with a wider 'wharf' space coming off it to the north. This arrangement is inspired by the traditional form of canals like the Grand Surrey Canal, with the linear canal element feeding into wharfs and basins along its length. As this site includes the location where the linear park would open onto the Old Kent Road itself, this part of the park has been given careful consideration as a 'gateway'. Lateral views through the park have been considered, most notably the view along Livesey Place from Peckham Park Road, which would lead to the new potential destination use. It would be a predominantly green/ soft

landscaped space with large areas of lawn which would be “species rich” to encourage biodiversity, localised seating areas, a formal play area within the ‘wharf and doorstep ‘playable landscape’ distributed throughout. Water features and Sustainable Urban Draining Solutions (SUDS), such as rain gardens, would be integrated throughout its length. There would be semi mature tree planting to give an instant sense of permanence and grandeur. The main east-west circulation for pedestrians and cyclists would be to the north, with secondary circulation to the south. Design details would reference the industrial heritage of the area, again in line with the council’s emerging vision. The part of the linear park delivered here would be 112m long and would vary in width between 24 and 40m. It would provide 3,510 sqm of public open space. It would be publicly accessible at all times, as secured through the Section 106 Agreement.

233. In total, 117 trees would be planted as part of the scheme. The landscape would include “cycle speed bumps” where pedestrian routes cross the linear park, to low down cyclists and ensure peaceful co-habitation of the space by all users.

Image: Linear park plan



234. The urban square on the other side of Block C would provide a harder open space of a more civic character immediately adjacent to the Old Kent Road itself. It would also provide a link to the potential destination use and would become a destination space in its own right. As with the park, it would be fronted by appropriate commercial uses to

provide activity and vibrancy at ground floor. The contrast to the green character of the linear park would be deliberate and would help to create identity and a sense of place. The square would be buffered from the more hostile, noisy environs of the Old Kent Road itself with raised planters and semi mature tree planting. This would also ensure a pleasing sense of enclosure and pedestrian comfort, and provide seating opportunities. The square would be open and flexible. It is envisaged that it would host events such as food markets and film or sport screenings. There would also be spill-out spaces for the commercial uses in Block C. The urban square would measure 40 by 26m and would provide 1,090 sqm public open space.

235. Within Block A, there would be a communal courtyard space of 805 sqm for the use of residents in that block. It would include a play facility and would be surrounded by private terraces to the ground floor residential units to create a defensible buffer. At the centre of the courtyard would be a shared garden with large scale trees and focal tree planting, lawns, seating areas and doorstep play area.
236. The raised podium courtyard in Block B would be for the use of resident primarily. There would also be a small terrace for staff employed at the potential destination space. At second floor level there would be seating areas and play elements for younger children. Shade tolerant planting is proposed where deeper planting beds are possible, and lightweight planting elsewhere. Where there would need to be blank facades (i.e. to the rear of the retail units) vertical greening is proposed. The potential for these walls to be used for play is also suggested (e.g. climbing opportunities). Trailer planting would be used to offer glimpses of green from the public realm below. At third floor, a residents seating terrace is proposed.
237. Other roof terraces, both private and communal, are also proposed in Blocks A and B. All inaccessible roofs would provide biodiverse planting for ecology. Approximately 930sqm of biodiverse roofscape is proposed across the development.
238. The streets have been designed with a clear hierarchy. On the new street, proposed at the centre of the development, only vehicles who need to access the proposed basement, as well as the servicing bay outside the destination space would be permitted. Wide footways, street trees and furniture zones are proposed with upstand kerbs for pedestrian comfort. The design would feature elements like paving materials and rumble strips selected specifically to direct vehicles into basement and reduce vehicle speeds. Unified paving materials and half height kerbs would be used beyond this point in order to create a pedestrian priority area (it would remain accessible for emergency vehicles and deliveries/drop off to Block C). Where residential uses front the streets at ground floor, defensible front garden spaces are proposed to provide a privacy buffer. Rain garden planting is also proposed within streetscape for SUDS, biodiversity and visual amenity.
239. The planting proposed is intended to provide diversity of habitat, meadow planting, rain gardens, a mix of native and non-native species selected to suit the site, trees arranged to provide canopy, bird and bat boxes. All of the existing trees on the site (28 in total) would need to be removed, but the proposal would deliver 117 trees in their place. The proposed tree strategy includes a combination of marker trees (45-50cm girth), avenue trees, parkland trees and street trees. A large number would be planted as semi mature for instant impact. The species proposed have been selected for attractive foliage, and seasonal variety. Some would be native, some would be nectar and fruit producing.

240. The public realm and streetscape would be fully accessible, and would provide level thresholds between internal and external spaces and across the open spaces. Any gradients would be in line with building regulations. The hard landscape material palette would consist of a simple range of natural materials which would be robust and complementary to the industrial heritage of the area. This would include: natural stone; clay paving; bound gravel; soft fall play areas; timber play areas; raised and flush metal edges; flags to footways; asphalt highways; granite kerbs and edges; timber and stone benches/ seating; weathered steel metalwork; and integrated wayfinding and signage embedded in surface materials.
241. The security of existing and new residents has also been considered, with planting and lighting arranged in such a way that there are no hidden corners within the landscape. A lighting strategy would be secured by condition and secured by design issues are discussed later in the report.
242. As described above, the landscape details submitted to date are considered high quality and appropriate for the development of this part of the Old Kent Road. Details of the design, materials and planting proposed would be required by condition. The Section 106 would secure the landscape designer (Fabrik) to deliver the detailed design of the scheme.

Design Review Panel: 12 March 2018

243. The applicants presented their emerging scheme to the Southwark Design Review Panel (DRP) for the first time on 12th March 2018. The Panel felt that there were a number of aspects of the design that they supported and could endorse, including the proposed public realm, the routes and public spaces and the detailed design of Tower C. They were briefed about the principles of the Old Kent Road AAP and felt they could support a high quality, high density mixed-use scheme in this location. They also supported the retention of the employment spaces and welcomed the idea of a 'destination' space. However, they questioned the urban rationale for the proposed height and massing and raised concerns about the detailed design of the low and mid-rise buildings and Towers A and B. The following paragraphs address each of their concerns in turn.
244. The Panel acknowledged that this site had been identified in the draft OKR AAP as a location suitable for 'tier 1' building height (i.e. above 30 storeys), but they were not satisfied that the applicants had demonstrated that three towers rising to 48 storeys could be justified in this location. They expected to see a clear urban design rationale to justify the proposed height, which had not been presented to them, and advised that such a rationale should include a sequence of views in both directions along the Old Kent Road, the wider area including, nearby conservation areas and open spaces and the wider panorama across London.
245. Officer response: The planning application includes a full and detailed Townscape and Visual Impact Assessment (TVIA), which includes sequences of views in both directions along the Old Kent Road and other views from the wider area, including conservation areas and open spaces. It also tests views from the relevant London View Manage Framework locations (Parliament Hill, Kenwood and Blackheath Point), and protected borough views from One Tree Hill and Nunhead cemetery. This, along with the clear urban design rationale and tall building strategy set out in the submitted Design and Access Statement address this concern. However, no view was tested from Crystal Palace, this was mentioned in the DRP report.

246. The Panel felt that the London wide scale of development proposed required further justification and consideration of its identity. They suggested that the proposed scale should be benchmarked against other locations across London where buildings of a similar scale have been consented and implemented. They also felt that the proposed identity of the development should be considered further and that the proposal should be described in the context of the Old Kent Road and the proposed linear park.
247. Officer response: The submitted material demonstrates very clearly the contribution that the proposals would make the Old Kent Road and the linear park. In particular, this is set out in the verified (and unverified) views in the TVIA, the computer generated images in the Design and Access Statement, the physical scale models produced and in the contextual elevational drawings.
248. The Panel were encouraged by the architectural direction of Tower C and felt this was the most developed aspect of the proposal. They liked the combination of its narrow footprint, angular form and simple architectural expression (subject to further design development and consideration of height). However, they raised significant concerns about the design of Towers A and B. When they considered Tower B the Panel felt the detailed design appeared fussy, needed further refinement and a stronger architectural concept. They encouraged the architects to review the Tower B design, to consider the expression of the base, middle and top and to design its landscaped setting in the context of the Old Kent Road.
249. Officer response: Significant changes have been made to both Towers A and B in response to the DRP's concerns. They have both been substantially reconfigured and now take their architectural concept from Tower C, using similar design and materials to those received positively by the DRP. Elevational proposals were simplified, including the omission of a previously proposed brick grid with a more restrained focus on ceramic panels instead. As a result, there is now a family of tall buildings, all inspired by the tower that the DRP felt had the potential to be very successful. Tower C has also been refined, particularly at ground floor and in the details of the facades.
250. The Panel raised significant concerns over the proposed massing of the low and mid rise buildings in Blocks A and B. They were concerned that they would have significant impacts on the nature and quality of the design including the sunlight and daylight levels on the public realm, the private courtyards and communal amenities and the residential units. They felt that this aspect of the proposal should be considered with the same rigour as the towers, helping to inform the arrangement of the buildings. The Panel challenged the designers to present their sunlight / daylight report together with their proposals and to demonstrate how they have adapted their design, and adjusted the massing to address any concerns. For example, the Panel felt the arrangement and massing of Block B should be adjusted so that the buildings relate better to the external spaces both on the podium and the public spaces around its edges. They questioned the concentration of massing on the south and west edges of the plot and facing onto narrow busy service roadways. They were also concerned that the shadow diagrams demonstrated that the large podium courtyard would remain in shadow for most of the year. The Panel challenged the designers to review this arrangement, perhaps to re-arrange the massing to the west and north sides of Plot B so that the southerly aspect of the courtyard benefitted from more sunlight and a better outlook.

251. Officer response: Blocks A and B have been significantly reconfigured in response to the concerns raised by the DRP. In Block B in particular, design changes were made in response to daylight, sunlight and overshadowing tests. An entire building has been omitted to create a widened 12m gap to the south and the building to the eastern side of the podium that previously ran the full length of Frensham Street without a break, has been subdivided into two distinct massing elements. The gap between these buildings was subsequently made even wider through further dialogue with Officers. It would provide an open view of sky over the rooftops of the houses opposite and would significantly enhance the amount of light entering the podium courtyard. The number of cores has been reduced from five to four, which allows for more gaps and distinction between buildings. The design team also added articulation and detailing to the low and mid rise elements that are now a well resolved element of the holistic design. Overshadowing diagrams illustrate that this space would now receive good levels of daylight, particularly in the afternoons. Daylight and sunlight is addressed elsewhere in the report.
252. When they considered Block A, the Panel were concerned that the designers had not shown how their proposal relates to the Berkeley Homes proposal for the neighbouring Malt Street site. They questioned the design of the extremely narrow courtyard, severely constrained block arrangement and single-aspect back-to back town-houses which appeared to be of very poor quality. They asked the applicant to show their proposal in the context of other nearby developments especially the Berkeley Homes scheme and other proposals that they were aware of.
253. Officer response: As mentioned above, Block A has been reconfigured in response to the DRP's concerns. This has also been informed by officers' concerns as they have a thorough understanding of both this and the Malt Street proposals. A series of workshop meetings between the relevant developers were held in order to ensure that the two developments would read as one single, coherent urban block. In order to avoid uncomfortable relationships between the fronts and backs of the two developments, 'walk-up' flats are proposed on the western boundary backing onto the Malt Street proposals. The courtyard provides 805 sqm of private communal open space. The enclosure and intimate scale of this space is considered a positive aspect of the proposal, as it contributes to residential quality of both the houses and flats that face onto it. Whilst the flats would be single aspect, there are many aspects of the design that mitigate the potential harm of this. For example, each core would only serve two dwellings per floor, over a total of four floors. Each core would also give access to a communal roof terrace and each unit would have generous private amenity space and well proportioned windows. The 'back-to-back' townhouses on the eastern side of the courtyard incorporates a light well to the rear allowing natural light and ventilation to permeate all levels. Furthermore, they are generously proportioned, laid out over three storeys with well defined private roof terraces and balconies integrated into the design. As such, they would provide high quality living environments that are likely to be highly desirable. Similar houses have proved successful at the Kidbrooke redevelopment in Greenwich.
254. The Panel felt that the proposals lacked a clear sense of place. In particular they felt that little thought had been put into how the homes would be used in daily life, including how people would access their front doors and use local communal facilities. They questioned the predominance of square single-aspect homes on the lower floors which would be difficult to plan – with dark deep-plan spaces and a narrow street frontage. It was also unclear how the scheme had accommodated defensible space for

these homes and how residents could access communal facilities like door-step play etc. They asked the designers to demonstrate how each home is designed around its residents, how each home would be accessed across the development, their access to communal facilities, bin and bike storage facilities and how they are planned internally.

255. Officer response: The submitted Design and Access Statement demonstrates that these aspects of the design have been carefully considered. A sense of place would be established through the family of tall buildings, shared architectural detailing of lower buildings and unified public realm. The submitted plans demonstrate that the maisonettes and townhouses at lower levels would be planned well, and whilst some of them would be single aspect, this is mitigated by other aspects of the designs. The locations of front doors have been carefully considered, as has the inclusion of well proportioned defensible space for all ground floor residences. Residential design quality is discussed in further detail elsewhere in this report.
256. The Panel questioned the extent of hard paving in the residential courtyards and communal facilities and also questioned the reliance on basement cycle storage across the development. They asked for more details about the plan layouts especially of Plots A and B as well as the communal courtyard landscape design. They requested a design for the basement taking in consideration the organisation of the communal facilities, movement of various transport modes (logistics) and parking strategy both in relation to the retail and residential buildings.
257. Officer response: The submitted material demonstrates that the much of the proposed courtyards and amenity spaces would be soft landscaped, with large areas of lawn and other planting in combination with pathways to allow access according to likely desire lines. Wherever possible, particularly in the courtyard in Block A, large tree planting is proposed. Deeper planters are proposed at podium level to allow for tree and shrub planting. Cycle parking would be provided at basement level for Blocks B and C, and at ground to third floor levels in Block A. Step free access is proposed to all cycle parking in the form of passenger lifts measuring at least 2.1m deep by 1.1m wide. Commercial cycle parking is also proposed within the basement of Block B. Visitor cycle parking is proposed at grade within the public realm. Detailed design of the cycle parking would be required by condition. Detailed plan layouts have been submitted of all plots, including the basement.
258. The Panel requested more information about the detail design of the towers especially the internal arrangement at the upper levels. Some of the flats were arranged around balcony spaces for example which, at the upper-most levels, are unlikely to be unusable if they remain open to the elements. In these cases the balconies are likely to become winter gardens which may result in a changing appearance on the façade and unusual habitable spaces with limited access to natural ventilation. The Panel asked the designers to be realistic about what is achievable and how the design will adapt with height to ensure that the flats, including their private amenity spaces will be used and enjoyed.
259. Officer response: Detailed layouts of all levels within the towers have been submitted. Where winter gardens are considered necessary, this has been incorporated into the façade design and plan layouts successfully. On the whole, the residential layouts adapt well to the heights of the buildings. Whilst it is the case that on the upper levels of the taller buildings in Blocks B and C there would be bedrooms that would open onto winter gardens with no other windows, no habitable spaces would have limited access to natural ventilation as the winter gardens would have openable windows. On

balance, the recessed winter gardens are considered more practical than open balconies in terms of comfort for users, and more attractive in relation to the external appearance of the building. This arrangement is therefore considered acceptable.

260. The Panel asked the Applicants to return to the DRP when they had addressed the concerns raised points and to continue the dialog with the council and adjacent development sites to ensure a consistent design strategy for the linear park.

Design Review Panel: 12 February 2019

261. The application scheme was presented to the Design Review Panel for the second time on 12 February 2019. The formal report following the DRP has not been released at the time of writing but from the verbal response from the Chair at the end of the meeting, the main concerns were around:

1. Identity: Overall, the Panel raised a question over the identity and hierarchy of the development. The Panel did not feel there was a coherent narrative in terms of the hierarchy of place in the way it has defined the routes and spaces in and around the site. When they considered the civic identity of the proposal the Panel acknowledged that the scheme offered a rich mix of uses especially at the ground floor. However, they questioned how the hierarchy of these facilities had been reflected in the urban and architectural design. For example when the Panel looked at the destination space in Block B they highlighted that this is not distinguished in any particular way in the façade.

2. Residential quality: There was a clear focus on the 'back to back' houses and whether this was a suitable configuration given their single aspect design. Whilst they welcomed the provision of single family houses on this extremely dense site, the Panel felt these units were severely compromised. They highlighted the single aspect outlook onto a service lane, the inadequate separation distances in Block A, and inadequate access to communal facilities in Block B in their concerns about these houses.

3. The massing: The Panel generally accepted the proposed massing and arrangement as well as the layout of Blocks B and C. They were broadly satisfied with the arrangement and scale of the three towers. However, they questioned the simplistic explanation of a family of buildings that are in turn defined by their texture – rough to smooth. The Panel challenged the designers to develop the detailed design of the towers, to give them a recognisable sense of identity.

262. Officer Response: Detailed design conditions, including mock ups of the façade have been requested by condition to consider the detailed appearance of the tiled ceramic panel material for each of the three towers; it is felt that this satisfactorily addresses the comments made about on massing. In addition, the applicant has amended the detailed design for the 'back to back' houses. This amendment retains the ground floor living space at the full depth of the building as per the original design but removes the roof level rooflight forming an open lightwell at first and second floor levels, that the bathrooms and stair open onto. This allows for the bathroom and stairs to be naturally lit and ventilated and allows for cross ventilation of the upper floor bedrooms. Whilst the homes would not fit the true dual aspect definition, they would allow for some cross ventilation to occur. It is felt that this change satisfactorily addresses the comments made about the 'back to back' houses and results in a much improved design.

Impact on the Setting of Listed Buildings, Conservation Areas and Townscape

263. London Plan (2016) Policy 7.4, Local Character, states that development proposals should respond to their context, including buildings, open spaces, street patterns and the historic environment and Policy 7.8, Heritage Assets and Archaeology, seeks to record, maintain and protect London's heritage assets in order to utilise their potential within the community. It states that development should conserve the significance of any heritage asset it affects. Southwark Core Strategy Strategic Policy 12, Design and Conservation, states that development should ensure that the significance of built heritage assets is conserved. Saved Policy 3.15, Conservation of the Historic Environment of the Southwark Plan (2007) states that development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance and Policy 3.18, Setting of Listed Buildings, Conservation Areas and World Heritage Sites states that the immediate or wider settings of designated heritage assets must be preserved. The NPPF (2018) requires Local Authorities to consider the impact of a proposed development on the significance of a designated heritage asset and to give significant weight to their considerations. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should be categorised as either substantial or less than substantial. Substantial harm should only be permitted in exceptional circumstances. Less than substantial harm should be weighed against the public benefits of the proposal.
264. The application site does not sit in a conservation area and it contains no listed buildings. There are no conservation areas in the immediate vicinity of the site. The Coburg Road, Trafalgar Avenue, Glengall Road, Thorburn Square, Caroline Gardens and Peckham Hill Street Conservation Areas are all within 1km of the application site, and their setting could therefore be impacted upon.

Conservation Area	Distance from site
Glengall Road Conservation Area	Approximately 370m north-west
Trafalgar Avenue Conservation Area	Approximately 490m north-west
Cobourg Road Conservation Area	Approximately 660m north-west
Thorburn Conservation Area	Approximately 660m north
Caroline Gardens Conservation Area	Approximately 560m south-west
Peckham Hill Street Conservation Area	Approximately 680m south-east

265. Also within the area surrounding the application site are the following Grade II listed buildings and structures:
- Former Camberwell public Library and Livesey Museum;
 - Statue of George Livesey;
 - Mural at the Civic Centre;
 - 2 – 9 Canal Grove Cottages;
 - Gas standard lamp (adapted to electric light), Canal Grove;
 - Eveline Lowe School (now Phoneix Primary Academy);
 - 1 – 35 (odd) Glengall Road;
 - 24-38 (even) Glengall Road;
 - 1-9 Glengall Terrace;
 - 25-43 Trafalgar Avenue
 - Celestial Church of Christ and attached wall and railings

- 108 -124 Peckham Park Road (even); and
- Church of our Lady of Seven Dolours

266. The existing buildings and structures on the application site share no historical relationship with these listed buildings and are not considered to contribute positively to their setting.

267. Although of very limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. The following buildings, within the immediate vicinity of the site, are identified as such. These buildings are also included on the draft Local List published by the Council in March 2018.

Property	Description
90 Haymerle Street	Building or Feature of Townscape Merit
Acorn Wharf Chimney	Building of Architectural or Historic Interest
Livesey Place cobbles	Building or Feature of Townscape Merit
553 Old Kent Road	Building of Architectural or Historic Interest
541-549 (odd) Old Kent Road	Building of Architectural or Historic Interest

268. Volume 2 of the submitted ES considers the impact of the proposals on the built heritage of the surrounding area. It concludes that although the proposed development would not have any direct impacts on the fabric of any designated or undesignated heritage assets, the heights of the buildings would result in considerable change in the townscape of the area and would therefore impact on their settings. The impact of this is discussed in greater detail in response to the submitted Townscape and Visual Impact Analysis (TVIA) below.

269. On balance, Officers consider that the replacement of the poor quality townscape that currently occupies the application site would enhance the settings of the surrounding heritage assets through the high quality detailed design and material palette proposed and the introduction of new routes and public spaces within the site.

Townscape and Visual Impact Analysis (TVIA)

270. The submitted Townscape and Visual Impact Analysis reports on the impact of the proposed development on 35 views from the surrounding area. The views were selected in consultation with officers in order to ensure the most sensitive views were tested, and include protected views from the London View Management Framework and locally protected views.

271. The images of the views presented in this report show the submitted scheme in green, the committed schemes in pink (such as Ruby Triangle and Nye's Wharf) and the AAP masterplan in blue.

London View Management Framework (LVMF) Views

272. London Plan (2016) Policy 7.11, London View Management Framework, and Policy 7.12, Implementing the London View Management Framework, relate to the identified strategic views in London. They state that development should not harm these views,

and where possible should make a positive contribution to the characteristics and composition of strategic views. Supplementary Planning Guidance on the LVMF was published in March 2012.

273. The LVMF views likely to be impacted upon by the proposed development are 2A.1 from Parliament Hill, 3A.1 from Kenwood and 6A.1 from Blackheath Point.

View 1 Parliament Hill (LVMF 2A.1)

274. This view is from LVMF viewing location 2A.1 at the summit of Parliament Hill. The view crosses a wide span of London. The foreground is occupied by the open space of Hampstead Heath. The tall buildings of central London appear in the distance, including the City of London cluster. The vista to St Paul's Cathedral in the centre of the view is protected. The view is of high sensitivity.
275. The proposed development would be visible in the background of the view, some distance to the right the Viewing Corridor and Wider Setting Consultation Area defined by the LVMF. It would be to the right of Guys Hospital and perceived as a similar height. The composition of the proposed buildings would result in a form that steps down away from the Shard as the tallest element at the centre of the view. Although two of the tall buildings would visually coalesce, their stepped composition would avoid a harmfully monolithic appearance. There would be no effect on the silhouette of St. Paul's Cathedral or the ability to appreciate St. Paul's in this view. Considered cumulatively, the Ruby Triangle scheme (18/AP/0897), which has a resolution to grant consent, would be visible between the development under consideration here and Guys Hospital. The submitted Capital House scheme (18/AP/0900) (not yet consented, and subject to recent revisions) would be visible behind the Shard. Both would be of a similar perceived height as the scheme under consideration here, and the stepped composition of Ruby Triangle would mirror the stepped composition of Cantium in a successful manner. Together the latter two schemes would mark the presence of the regeneration at the Old Kent Road. As the silhouette of the Cathedral would be preserved, and the wider setting consultation area would not be encroached upon, it is not considered that there would be any harm to this view. Furthermore, the Shard would remain the tallest feature in the view, by quite some degree of magnitude.
276. Historic England have not raised any concerns in relation to this view.
277. The GLA assess that although the proposed development would be visible to the right of Guys Hospital, in the background of the view of St Paul's, it would not detract from the viewer's ability to recognise the landmark, or harm the composition of the view as a whole. Southwark Officers agree with this assessment.

Image: View 1 Parliament Hill



View 2 Kenwood (LVMF 3A.1)

278. This view is from LVMF viewing location 3A.1, at the viewing gazebo at Kenwood House, set within an estate bordering Hampstead Heath. The foreground of the view is occupied by the open parkland, with a band of mature trees providing a sense of containment beyond. Central London, and particularly the tall buildings of the City, is visible beyond to the left of centre in the view. St Paul's Cathedral is visible to the right of the Shard. The vista towards St Paul's is protected. The view is of high sensitivity.
279. The proposed development would be visible to the right of St Paul's Cathedral and Guy's Hospital, stepping down in height away from the Shard. The tallest tower would break the horizon line, in a similar manner to Guys Hospital. There would be no encroachment on the Viewing Corridor or Wider Setting Consultation Area defined by the LVMF, but the buildings would be seen in the background of the wider setting consultation area. As a result of the composition of tall buildings proposed, and the way in which they step down in height, it is considered that, in line with paragraph 121 of the LVMF Supplementary Planning Guidance, they would "contribute to a composition that enhances the setting of the Strategically Important Landmark". As such, and given that there would be no impact on the perception of St Paul's Cathedral, there would be no harm to the view. Considered cumulatively, a slither of the Ruby Triangle scheme would be visible to the left of the Shard and the submitted Capital House scheme would be visible to the right. These would be viewed as separate elements in the background of the view, so it is not considered that there would be any cumulative harm caused by the proposed development.
280. In their consultation response, Historic England draw attention to this view, but do not describe the impact as harmful or raise any objection.

281. The GLA identify that the development would be visible to the right of the Shard and describe it as forming part of the wider skyline particularly when viewed in the context of Guys Hospital. They conclude that, although the proposal would appear immediately to the right of the western towers of St Pauls, as it would maintain the clear skyline behind the dome, it would not compromise the viewer's ability to appreciate the landmark.

Image: View 2 Kenwood



View 3 Blackheath Point (LVMF 6A.1)

282. This view is from LVMF viewing location 6A.1, at Blackheath Point. The view is a panorama towards the City of London. The LVMF guidance is concerned primarily with St Paul's Cathedral, which is partially visible to the right hand side. The proposed development would be visible on the skyline a significant distance from St Paul's Cathedral. It would appear as part of the layered townscape in this extensive panorama, composed as a visually interesting grouping of buildings. Considered cumulatively, the proposed development would be perceived as part of a cluster with the Ruby Triangle scheme, together marking the presence of the Old Kent Road Opportunity Area. There would be no harm to this strategic view. The GLA consider that the proposed development would create an additional point of interest in this viewpoint and Historic England do not refer to it.

Borough Protected Views

283. Although of limited weight, the draft NSP, Policy P19, 'Borough Views', states that development must positively enhance the borough views which have been identified. The Borough Views potentially impacted on by the proposed development are the London Panorama of St Paul's Cathedral from One Tree Hill and the linear view of St Paul's Cathedral from Nunhead Cemetery. The draft policy states in both cases that

development must “maintain the view of St. Paul’s Cathedral from the viewpoint place”, “not exceed the threshold height of the view’s Landmark Viewing Corridor”, and “not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer’s ability to recognise and appreciate St. Paul’s Cathedral and its setting”. It also states that a canyon effect of the view of St. Paul’s Cathedral must be avoided.

View 4 One Tree Hill

284. This Borough View is from on One Tree Hill in Honor Oak park, looking towards central London. The view is framed by trees. St. Paul’s Cathedral is visible to the east of the Shard (on the left side of the image). Its profile is almost entirely uninterrupted by development in its foreground. The towers in the City of London appear further west (right).
285. The proposed development would be visible in the distance, towards the centre of the view, some distance from St. Paul’s Cathedral. It would sit in front of the cluster of towers in central London, but as it would be lower than the tallest parts of the city cluster, this could still be perceived. Furthermore, the ceramic finish proposed to the tall buildings under consideration here would differentiate them from the more glassy towers of the city cluster. The proposed development would be read as part of an extensive panorama and would contribute to a layered townscape. It would appear as a visually interesting grouping of buildings, comprising elements of different heights and with complimentary elevational finishes. As St Paul’s Cathedral would remain clearly visible set well to the left of the proposed development, there would be no harm to the significance of this view. Considered cumulatively, the Ruby triangle scheme would be visible even further to the right of the view and the submitted Capital House and approved Fielden house schemes would form a cluster around the base of the Shard. There would be no cumulative harm to the view.
286. Historic England does not make reference to this local view. The GLA consider that the proposed development would form an interesting addition to the townscape.

View 5 Telegraph Hill

287. This Borough View is from the top of Telegraph Hill looking towards central London. It is designated as an important local view by the London Borough of Lewisham. In foreground of the view is a grassy park, and terrace of houses. On the horizon, a number of landmark views can be identified.
288. The proposed development would appear towards the centre of the view, at the tallest point, perceived as a similar height to the Shard, which is visible on the horizon at the centre of the view. It would become a prominent new feature in the view, but would not obscure any central London landmarks. As such, it is not considered to cause any harm. Cumulatively, the Ruby Triangle scheme has a similar impact on this view, although Ruby Triangle would be perceived as taller than the Shard. Neither would obscure the Shard as the landmark focus of the view, and although they would add prominent new features, there would not be any cumulative harm.
289. Neither Historic England nor the GLA make reference to this view, and Lewisham did not responded to consultation.

View A2 Nunhead Cemetery

290. This Borough View is located in Nunhead Cemetery, within the Nunhead Cemetery Conservation Area. The view is towards St. Paul's Cathedral, with Highgate West Hill beyond it in the distance. The view is framed by trees, specifically maintained to ensure the view is visible. The view is of high sensitivity.
291. The proposed development would be located well to the side of St. Paul's Cathedral in this view, and obscured by tree branches to such an extent that it would be virtually indiscernible, even in winter. There would be no harm to this view. Considered cumulatively, the Ruby Triangle scheme would be further to the right, and so even more unlikely to have any impact. The Capital House proposal is also obscured by tree cover at present, but as it is closer to the centre of the view, could be exposed with future tree management. Nonetheless, there would be no cumulative harm contributed to by the scheme under consideration as this would remain obscured.
292. Historic England acknowledge that View A2 would not be affected by these proposals providing tree coverage remains as it is currently. The GLA do not make reference to the view.

Local Views

293. In addition to the strategic views protected by planning policy, the submitted TVIA sets out the impact on a number of views within the immediate vicinity of the site. The impact on each is summarised below.

View 6 St James's Road

294. This view is from a slightly elevated position on St James's Road where it bridges over Stevenson Crescent, looking south. It is generally of low heritage and townscape significance, but is useful to show how the proposed development would impact on this predominantly residential area. The proposed development would appear in the centre of the view, on axis with St James's Road. It would be of significant impact on this view, and perceived as substantially taller than the existing townscape. It is however not considered harmful as the view itself is not considered sensitive to change and the quality of design proposed is such that it would provide an interesting and attractive new focal point. The composition of the proposed buildings avoids visual coalescence. Considered cumulatively, the consented scheme on the former petrol station site on the corner of St James's Road and Rolls Road (15/AP/1705) would be visible in front of the proposed development and Ruby Triangle would just be visible to the far left. Given the scale of the consented scheme and the peripheral visibility of Ruby Triangle, there would not be any cumulative harm.

View 7 Rotherhithe New Road/ Catlin Street

295. This view is from the north pavement of Rotherhithe New Road, just east of the junction with Catlin Street. It is generally of low heritage and townscape significance, but is useful to show how the proposed development would impact on this predominantly residential area. The proposed development would be visible in this view, although much of it would be screened by tree canopies, particularly in summer. The taller elements are located to either side of the road in the centre of the view, retaining a clear view of sky on the main axis. Given this, the low sensitivity of the view

and the high quality of design proposed, there would be no harm to this view. None of the cumulative schemes considered would be visible in this view.

View 8 Rotherhithe New Road/ Verney Road

296. This view is from the junction of Rotherhithe New Road and Verney Road. It was chosen as a key viewpoint on the main road directly approaching the site from the north. It is generally of low heritage and townscape significance. The proposed development would become a highly visible and prominent feature in this view, and given the proximity of the viewing point to the application site, the varied elevational treatments and well considered massing of the proposed buildings would be clearly discernible. The high quality of the design would create an attractive new focal point in the view. There would be no harm. Considered cumulatively, part of the Nyes Wharf (ref: 17/AP/4596) scheme would be visible behind the proposals under consideration here, and would be read as part of the overall composition of new buildings emerging on the Old Kent Road. There would be no cumulative harm.

View 9 Rotherhithe New Road/ Verney Road

297. This view is from Sandgate Street. It was chosen as the most likely point at which the Grade II listed Canal Grove cottages would be visible in the foreground of the proposed development. They are not prominent in this view, and it is not considered to contribute positively to their significance or the significance of their setting. It is also not considered a good view from which to appreciate the heritage value of the listed structures. The proposed development would become a highly visible and prominent feature in the centre of the view, directly behind the listed cottages. Given the poor townscape quality of the existing setting of the cottages, it is not considered that they would be harmed by the introduction of this new feature in the view. Indeed, given the high quality of design proposed, it could be considered that the new development would have a beneficial impact on their setting. Considered cumulatively, this viewpoint is adjacent to the Ruby Triangle proposals, which would transform the setting of the listed cottages in a positive manner. The cumulative impact is therefore considered beneficial overall.

View 10 Bridge House Meadows

298. This view from is Bridgehouse Meadows in Lewisham. It is of low heritage or townscape sensitivity. The proposed development would be highly visible in the background of the view. The Grade II listed gas holder would remain visible and would form a central focal point within the panorama. Given the low sensitivity of this view, the impact would not be harmful. Considered cumulatively, the Ruby Triangle scheme would be visible in front of the proposals under consideration here, and both schemes would be read together as a cluster of tall buildings. There would be no cumulative harm.

View 11 New Cross Road/ Pomerory Street

299. This view is from Lewisham, looking north west towards the application site. It was chosen to show the likely impact of the proposed development on the Grade II listed early 19th Century houses in the foreground and the Windsor pub, which while not listed is an attractive townscape feature. The view is of mixed heritage and townscape significance, but overall of low sensitivity to change. The proposed development would be partly visible to the right of the view, behind the Tustin Estate. It would be obscured

to a significant degree by tree foliage, particularly in the summer. There would be no impact on the setting of the listed buildings. None of the cumulative schemes considered would be visible in this view.

View 12 Old Kent Road/Asylum Road

300. This view is from Old Kent Road, on the junction with Asylum, Road. It is of medium heritage and townscape sensitivity, as many of the buildings in the foreground are identified as being of townscape merit in the draft OKR AAP and appear on the draft Local List. In the distance, at the centre of the view, is the truncated spire of Christchurch Peckham, also on the draft local list and identified as being of architectural or historic interest in the draft OKR AAP. The proposed development would become a prominent new focus at the centre of the view, but would not obscure Christchurch Peckham. There would be a clear view of sky between this undesignated heritage asset and the proposed development. The profile of the new development would be very slender and elegant from this perspective and the white ceramic finish would contrast pleasantly with the red brick of the historic buildings. To a certain degree, the proposed development would also be screened by tree foliage, particularly in summer. There would be no harm to this view. Considered cumulatively, parts of the Ruby Triangle scheme would be visible to the left hand side of the view. The proposals would not visually coalesce, but would frame the Old Kent Road itself. There would be no cumulative harm. Indeed, given the quality of design proposed, the impact would be likely to be beneficial to the wider townscape.

View 13 Old Kent Road/Ruby Street

301. This view is from the northern side of Old Kent Road, looking north west towards the proposed development. It is within the vicinity of the Grade II listed Camberwell public Library and Livesey Museum, which is just out of view on the other side of the Old Kent Road. To the left of the view, fronting onto the Old Kent Road is a terrace of buildings of architectural or historic interest as identified in the draft OKR AAP and on the draft Local list. This view is therefore of mixed heritage significance, as much of the surrounding townscape is of low quality. The proposed development would be visually prominent, at the end of the terrace mentioned above. Again, the proportions are slender and elegant, and the quality of design would result in an attractive new focal point in the view. As a result, there would be no harm to the view, and the inclusion of the new development is considered beneficial. Considered cumulatively, the Ruby Triangle scheme would define the frontage of the Old Kent Road to the right of the view. It is also considered beneficial when compared with the poor quality of the current townscape.

View 14 Asylum Road

302. This view is from Asylum Road looking across the Grade II listed office building to the Licensed Victuallers Benevolent Institution. It is on the boundary of the Caroline Gardens Conservation Area. The edge is defined by high railings and mature trees that screen the listed buildings to a certain degree. The view is of high heritage significance and very sensitive to change. The proposed development would only be visible through the trees and behind the blocks of the Ledbury Estate. It would be screened by tree branches to a significant extent in the winter and would be almost completely obscured by foliage in summer. It would also be seen in the context of the Ledbury Estate, which has already compromised the heritage significance of this view. It is considered that the limited visibility of the proposed development would not harm

to the significance of this view, or the setting of the listed building. Considered cumulatively, the top of the Nye's Wharf scheme would be visible at a lower height, but closer to the centre of the view, and Ruby Triangle would just be visible to the far right hand side. This cumulative impact is considered to be of some less than substantial harm, which is outweighed by the wider public benefits of all three schemes.

303. Historic England consider that View 14 does not successfully capture the stately character and formal arrangement of Caroline Gardens which underpins its significance as a listed building complex and conservation area. Accordingly, the applicant did submit an additional view to address these comments which Historic England have yet to comment on at the time of writing. The proposed development is also well screened by dense tree coverage in this view. Although they consider it difficult to ascertain, View 14 suggests that the development would rise significantly above the height of the Ledbury Buildings in forecourt views, further disrupting the formal orthogonal plan and enclosed setting of Caroline Gardens. Having reviewed this view, officers consider that it would not harm the character of the Conservation Area or the setting of the Grade II listed almshouse buildings.
304. As described above, officers are of the view that the analysis submitted is sufficient to assess that there would be some harm caused the Caroline Gardens Conservation Area and Grade II listed almshouses. As with Historic England, Officers consider this harm to be less than substantial and to be outweighed by the wider regeneration benefits of the proposals.
305. GLA officers consider that the proposed buildings would respond to the changing context of the area, and would bring about substantial improvements in the quality of the existing environment by introducing permeable public routes through the site, including the linear park and improved public realm. Additionally, the proposals would regenerate this part of the Old Kent Road Opportunity Area by bringing about a substantial increase in jobs and homes, including affordable homes. Whilst there would be some harm to the setting of some conservation areas and listed buildings (they are not specific about where this harm would be), particularly by reason of larger buildings becoming visible in their backdrops, GLA officers consider this harm to be less than substantial, and decisively outweighed by the public benefits of the scheme. As such, they are of the view that the proposals would accord with Policy 7.8 of the London Plan and Policy HC1 of the draft London Plan.

Image: View 14 Asylum Road



View 15 Meeting House Lane/Naylor Road

306. This view looks north up Naylor Road directly towards the application site. It is not within a Conservation Area and is of low heritage value and sensitivity to change. The proposed development would be highly visible at the centre of the view, terminating Naylor Road. Due to the distance from the viewing point, low sensitivity to change and high quality of design proposed, there would be no harm on this view. None of the cumulative schemes considered would be visible in this view.

View 16 Green Hundred Road

307. This view looks north west along Green Hundred Road. The foreground of the view is open, with a five storey apartment block and two storey, late 19th Century terraced housing in the mid distance. The two storey houses are identified as being of townscape merit in the draft OKR AAP and are on the draft local list. The view is therefore of some heritage significance. This is however limited given the context in which these houses are viewed. The proposed development would be highly visible at the centre of the view. Again it would have a slender and elegant form, and given the proximity of the site, the well resolved elevational treatments would be clearly discernible. The white ceramic finish would compliment the white paint and stucco of the existing houses. Whilst there would be a significant impact, it would therefore not be harmful. None of the cumulative schemes considered would be visible in this view.

View 17 - Goldsmith Road/ Friary Road

308. This view is from the junction of Goldsmith Road and Friary Road. Both sides of Friary Road are lined by two storey historic terraces creating a considerable degree of coherence. Those on the east are Grade II listed. There is a school building in the middle distance. The view is of relatively high townscape sensitivity. The proposed development would be clearly visible right in the centre of the view on the axis of Friary Road. Again, the profile of the most prominent building would be elegant and slender and the design would be of high quality. Nevertheless, given the sensitivity of the view, the appearance of modern tall elements in the background of this relatively coherent historic townscape would cause some substantial harm to its significance. This would however, be outweighed by the wider regeneration benefits of the proposals. Considered cumulatively, the tallest parts of the Ruby Triangle would appear behind the houses on the eastern side of Friary Road, breaking the consistent roofline. This too would contribute to the less than substantial harm mentioned above, but would also be outweighed by the wider benefits of both schemes. It would also be screened to some extent by tree foliage, particularly in summer.

Image: Goldsmith Road/ Friary Road



View 18 Bird in Bush Road / Friary Road

309. This view is from the junction of Bird in Bush Road/ Friary Road. It is dominated by the Our Lady of Seven Dolours Church to the left, which is Grade II listed, giving the view relatively high heritage significance, despite the lower quality or the surrounding townscape. The proposed development would be highly visible in the centre of the view, including Block B which would be perceived as adjoining the listed church. They would form a well composed group at the centre of the view, and again would be of high design quality. The white ceramic finish would compliment the stone of the listed church well. Nonetheless, given the sensitivity of the view, there would be some harm,

particularly to the setting of the church. This would be less than substantial however, and outweighed by the wider regeneration benefits of the proposal. Considered cumulatively, the taller parts of the Ruby Triangle development may just be visible to the far right of the view. They would however be substantially screened by tree foliage and seen in the context of the red brick Friary Estate rather than the listed church. There would therefore be no cumulative harm to the heritage significance of the view or the setting of the church.

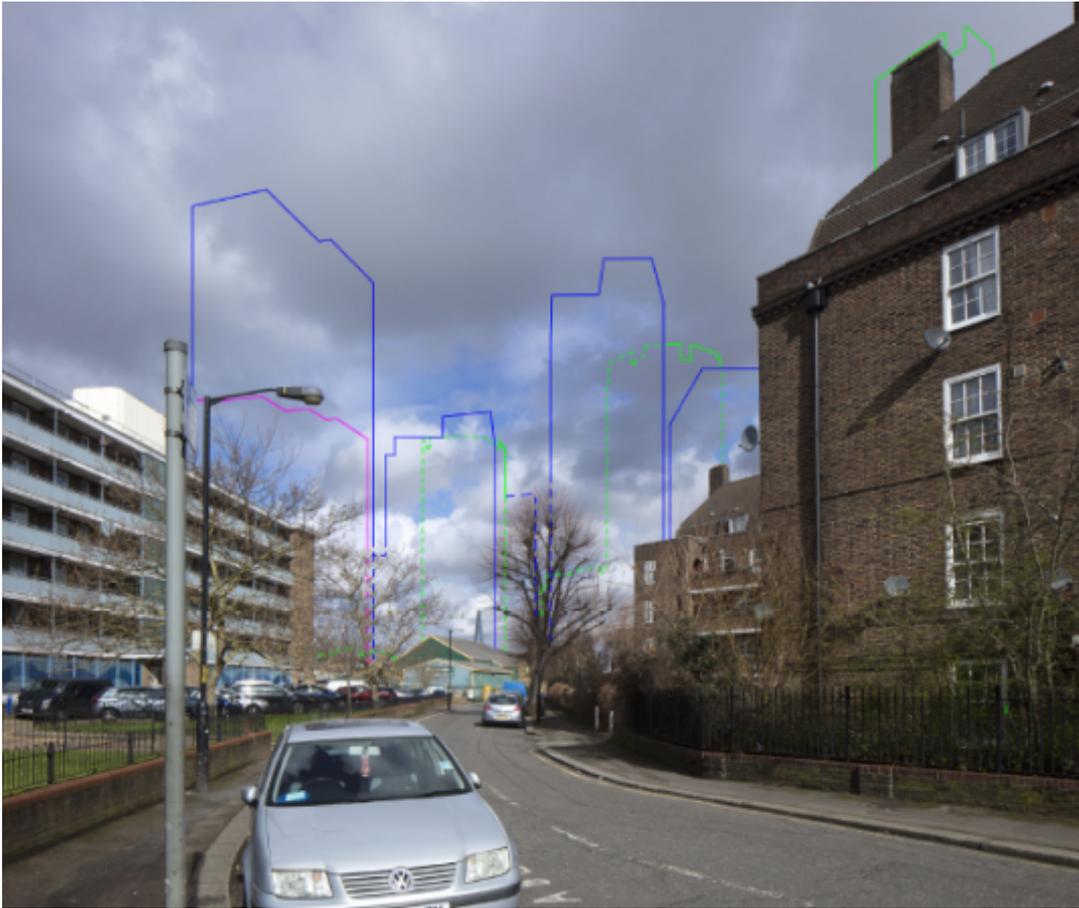
Image: View 18 Bird in Bush Road / Friary Road



View 19 Peckham Park Road/ Frensham Street

310. This view is from Frensham Street just past the junction with Peckham Park Road. It is framed by housing estates; to the right the 1930's Northfield House; to the left the later mid Twentieth Century Greystoke House. The view is of mixed heritage value, but is important to show what the impact of the development will be in this highly populated area. The proposed development would be highly visible in relatively close proximity to these housing estates. The taller elements of Blocks A and B would frame either side of Frensham street as it sweeps around towards the site. Given the mixed character of the existing view and the high quality of design proposed, there would be no harm to this view. Considered cumulatively, the Nyes Wharf Scheme would be visible to the right of the development under consideration here, largely behind Greystoke House. It would not visually coalesce with the proposed development, so views of sky would be maintained between them. There would be no cumulative harm.

Image: View 19 Peckham Park Road/ Frensham Street



View 20 Peckham Hill Street/ Commercial Way

311. This view is taken from the junction of Peckham Hill Street and Commercial Way, just outside the Peckham Hill Street Conservation Area. As the view does not look into the conservation area itself, its heritage significance is relatively low, although it is worth noting that, just out of view to the left is a row of Grade II listed terraced houses that are in the conservation area. The top of the proposed development would be visible over the rooftop of the foreground buildings. The taller element would be screened to a degree by tree foliage, particularly in summer. Given the low sensitivity of the view and high quality of design proposed, there would be no harm to this view. Considered cumulatively, the Ruby Triangle scheme would appear towards the right hand side of the view adjacent to the six storey apartment block, Again, given the low sensitivity of the view and the moderate visibility of the proposals, there would be no cumulative harm.

View 21 Coleman Road/Newent Close

312. This view is from the bend in Coleman Road, at the junction with Newent Close. The view towards the application site is terminated by a group of Grade II listed, early 19th century terraced houses. In the foreground is a late 20th Century Apartment building. The heritage value of the view is however of some significance and sensitivity to change. The proposed development would be visible over the rooftops of the Grade II

listed terrace. Whilst they buildings would have a good degree of visual separation with clear view of sky between them, there would be some harm caused by the visibility of these tall modern buildings over an otherwise unbroken historic roofscape. The harm would be less than substantial and would be outweighed by the wider regeneration benefits of the proposals. Considered cumulatively, parts of the Ruby Triangle scheme would also be visible behind the roofscape of the listed terrace, albeit to the right and screened by tree foliage. As this scheme has a resolution to grant planning permission, the principle of breaking the historic roofscape has been established. It is considered that the additional harm caused by the proposals under consideration here would be less than significant and would be outweighed by the wider regeneration benefits of both schemes.

Image: View 21 Coleman Road/Newent Close



View 22 Glengall Road, Looking East Along Bianca Road

313. This view is from Glengall Road, looking directly along Bianca Road, along the alignment of what will become the new linear park promoted by the draft OKR AAP. At present the surrounding townscape is industrial in nature and of mixed heritage value. To the right is a red brick factory building identified as a building of townscape merit in the draft AAP and on the draft local list. A resolution to grant consent for the redevelopment of this site, but retain the facades and chimney, has recently been granted. To the left is a more recent industrial building, not considered to be of heritage significance. The proposed development would be highly visible in the middle distance of the view, marking the significant location where the linear park would cross the Old Kent Road itself. As such, it has a landmark quality, and because of the high quality design proposed would have a beneficial impact on the view. Considered cumulatively, the Nyes Wharf scheme would be visible to the right of the proposed development, on the other side of the linear park. The taller elements of Ruby Triangle would be visible in the distance to the right. Cumulatively, the emerging development proposals would frame the new linear park and mark the significant regeneration of the

Old Kent Road. The cumulative impact is therefore also considered beneficial.

314. It should be noted that the Glengall Road scheme (17/AP/4612) has not been included in this view, as this scheme was only recently approved by the council's Planning Committee (15 January 2019).

View 23 Burgess Park West Side

315. This view is from Burgess Park, on an important route through the open space. It is therefore of high sensitivity to change. The proposed development would appear in the middle distance, at the end of the route through the park, forming a focal point on the skyline. It would form a new, distinct layer of townscape with an interesting composition. The vertical emphasis of the taller buildings would result in elegant proportions, and a strong landmark presence at this focal point. Considered cumulatively, the Ruby Triangle scheme would also be visible at the end of this route through the park. Together they would form an attractive landmark composition, mark the regeneration of the Old Kent Road and improve the legibility of the skyline. The cumulative impact is therefore beneficial.

View 24 Burgess Park East Side (Lancroft Road)

316. This view is from the entrance to Burgess park on Lancroft Road, looking east. The view point and foreground of the view are within the Cobourg Road Conservation Area. The park is visible on the right hand side of the view and Cobourg primary school and a two storey, late 19th Century residential terrace are visible to the left. The view is of high heritage significance and sensitivity to change. The proposed development would be visible beyond the roofline of the buildings ahead. The tall buildings that would be visible would be clearly separate with a view of sky between them. The existing roofline at the end of the view, where the proposed development would be visible is already obscured by trees, and there is no particular focus or coherence to the view. The more sensitive roofscape to the left would be unaffected. As such, there would be no harm to this view. Considered cumulatively, part of the Ruby Triangle scheme would be visible within the gap between the two tall buildings. However, as it would be perceived as being shorter, the view of sky and attractive skyline composition would be maintained. The top of Nyes Wharf would also be visible to the right, much lower in scale and largely obscured by trees. There would be no cumulative harm caused to this view.

View 25 Burgess Park Lake

317. This view is from the edge of the lake in Burgess Park, looking into the Cobourg Road Conservation Area. The view includes some listed buildings, albeit from some distance away. It is therefore of some heritage and townscape importance.
318. The proposed development would be visible in the background of this view. It would form a new distinct layer of townscape and skyline; clearly separate from the park in the foreground and other lower scale buildings (including those listed buildings within the Cobourg Conservation Area) in the middle distance. The proposed composition would be visually interesting, with height stepping down towards the school. The vertical emphasis of the taller buildings would result in elegant proportions, and a strong landmark presence. As such, it is not considered that there would be any harm to this view. Considered cumulatively, a slither of the Ruby Triangle scheme would be visible to the right of the development under consideration here. It would be perceived

as a further background object as part of this cluster, but would make very little difference to the assessment above. As such, there would be no cumulative harm.

319. Historic England considers that the impact of the proposed development in this view would undermine the attractive and picturesque qualities of the Cobourg Road Conservation Area and Grade II listed townhouses in views from Burgess park and therefore cause less than substantial harm. As set out above, officers do not agree with this assessment given the distance of the viewing point from the Conservation Area and Listed Buildings, and the substantial tree coverage screening many of the heritage assets.
320. As above, GLA officers identify broad harm to the settings of some conservation areas and listed buildings, but conclude that this harm would be less than substantial, and decisively outweighed by the public benefits of the scheme.

Image: View 25 Burgess Park Lake



View 26 – Glengall Terrace

321. This view is from the eastern end of Glengall Terrace, within the Glengall Road Conservation Area. Most of the houses in the view are Grade II listed. As such it is of relatively high sensitivity in terms of heritage and townscape. The proposed development would be very visible behind the houses on Glengall Road at the centre of the view. The composition would be visually interesting, with height stepping down towards the listed houses. The buildings would be of high architectural quality, with strong vertical articulation, distinct tops and an elevational strategy that would avoid visual coalescence. The appearance of modern tall elements in this coherent historic townscape however, would have an adverse visual impact. The harm caused would be less than substantial and would be outweighed by the wider regeneration benefits of the proposals. Considered cumulatively, the Ruby Triangle development would be partially visible in the background of the view. Although it would fill some of the gap

between the two tallest buildings, as it would be perceived as being shorter it would maintain a view of sky between them. As such, this would make very little difference to the assessment above and there would be no additional cumulative harm. It is also important to note that, as the Ruby Triangle has a resolution to grant planning permission, the principle of breaking this historic roofscape has already been established.

322. Historic England considers that the proposed development would break the unobstructed roofline at the corner of Glengall Road and Glengall Terrace which would detract from the historic streetscape and cause less than substantial harm to both the Conservation Area and the setting of these Grade II listed houses. As above, Officers agree that there would be some less than substantial harm, but conclude that this would be outweighed by the wider regeneration benefits of the proposals.
323. As above, GLA officers identify broad harm to the settings of some conservation areas and listed buildings, but conclude that this harm would be less than substantial, and decisively outweighed by the public benefits of the scheme.

View 27 – Old Kent Road, near Bricklayers Arms

324. This view is from the norther part of the Old Kent Road, looking south. There are a number of buildings in this part of the Old Kent Road that have been identified as being of townscape importance in the draft OKR AAP and are on the draft Local List. The view is therefore of mixed heritage significance. It is not however considered to be sensitive to change. The very tops of the proposed buildings would be visible over some existing buildings on Old Kent Road. Given the minimal impact, there would be no harm to this view. Considered cumulatively, a slither of Nyes Wharf would be visible, but this would have little to no impact. There would be no cumulative harm.

View 28 – Old Kent Road, north of Trafalgar Avenue

325. This view is taken from further south along the Old Kent Road, adjacent to the fire station, and just north of Trafalgar Avenue. The Trafalgar Avenue Conservation Area is to the right, and the Grade II listed Lord Nelson pub is just out of view. Given the peripheral impact of these heritage assets it is not considered that the view is particularly significant or sensitive to change. The proposed development would be visible on the axis of the Old Kent Road, at the centre of the view. It would be screened by tree foliage to a certain degree, particularly in summer. Given the location of the proposed development at the entrance to the linear park from the Old Kent Road, and the proposed civic space and potential destination use, it is considered that it would play a beneficial landmark role in this view. Considered cumulatively, none of the committed schemes assessed would have any impact on this view. There would be no cumulative harm.

View 29 Old Kent Road/ Malt Street

326. This view is taken from further south again along the Old Kent Road, at the pedestrian crossing adjacent to Malt Street. The proposed development would be very visible, but as above, would play a beneficial, high quality, landmark role. Considered cumulatively, small parts of the other schemes considered would be visible, but largely screened by trees and peripheral to the view. There would be no cumulative harm.

View 30 Hunsdon Road

327. The tops of Building C1 and the tall element on Block B would be visible beyond the street trees and the Grade II Listed Gasholder. They would appear on axis with the street ahead but would be visibly distant elements on the skyline. Their stepped heights would appear well-composed and would help to make the two building forms legible. Their off-white ceramic cladding would have a light appearance against the sky and would be clearly separate from the brick and render terraces in the foreground. The proposed development would be noticeable but not a focal point in the view. The development within this view would be balanced by the distance of the proposed development, the small amount which is visible, the visual effects of the particular massing, design and materials in the view, its evident high quality design; the substantial regeneration and associated amenities and public spaces it signifies.

View 31 Southwark Park Road/ Monnow Road

328. This view is from Southwark Park Road, looking along Monnow Road. It is just outside the Thorburn square Conservation Area. Most of the buildings in the view form part of the Conservation Area (with the exception of those past the church on the left hand side of Monnow Street) and it has a very coherent historic character. The proposed development would be visible above the rooftops of the least significant part of the view. They would be largely screened by tree foliage, particularly in summer and would be peripheral to the coherent historic character described above. As such, there would be no harm to this view. None of the cumulative schemes considered would be visible. There would be no cumulative harm.

View 32 Nile Terrace

329. This view is from the north pavement of Nile Terrace looking east to Trafalgar Avenue. It is within the Trafalgar Avenue Conservation Area. The three storey 19th Century terraced housing in the foreground of the view is on the draft local list. It is of consistent design, character and has a uniform roofline. The view is therefore of heritage significance and sensitive to change. A very small slither of the top of the tallest building proposed would just be visible over the roofline of the listed terrace. It would be screened to a degree by tree foliage. The very small amount of development that would be visible would barely be noticeable. As such, there would be no harm to this view. Considered cumulatively, none of the schemes considered would be visible.

Cumulative views assessment

330. The submitted TVIA includes an assessment of the cumulative impacts of the proposal, with the 'committed' schemes shown in accordance with the requirements of the EIA Regulations (which include the nearby schemes at Ruby Triangle and Nye's Wharf). For other sites which do not benefit from planning permission or a resolution to grant planning permission they have been included in so far as how they appear in the draft OKR AAP masterplan. The submitted views show how the proposed development would sit if the surrounding sites were to be built out in accordance with the AAP masterplan.

Conclusion on the Setting of Listed Buildings, Conservation Areas and Townscape

331. The following table summarises the designated heritage assets that could be impacted by the proposal, and what harm, if any has been identified.

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
Glengall Road Conservation Area	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Trafalgar Avenue Conservation Area	No harm identified.
Cobourg Road Conservation Area	No harm identified by officers, but less than substantial harm identified to setting by Historic England.
Thorburn Conservation Area	No harm identified.
Caroline Gardens Conservation Area	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Peckham Hill Street Conservation Area	No harm identified.
Former Camberwell public Library and Livesey Museum	No harm identified.
Statue of George Livesey	No harm identified.
Mural at the Civic Centre	No harm identified.
2 – 9 Canal Grove Cottages and Gas standard lamp (adapted to electric light), Canal Grove	No harm identified.
Eveline Lowe School (now Phoneix Primary Academy);	No harm identified.
1 – 35 (odd) Glengall Road and 24-38 (even) Glengall Road	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
1-9 Glengall Terrace	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
25-43 Trafalgar Avenue	No harm identified.
Celestial Church of Christ and attached wall and railings	No harm identified.
108 -124 Peckham Park Road (even)	No harm identified.
Church of our Lady of Seven Dolours	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.

332. In conclusion, the proposed development would have a significant impact on many of the views assessed, becoming a highly visible feature in the surrounding townscape. However, in the majority of cases, the impact is not considered to be harmful. Indeed in some views it is considered beneficial. The quality of design would be high, with a

good composition of buildings, strong vertical emphasis and characterful tops creating new interest on the skyline.

333. There are however seven views where either Southwark officers or Historic England (or both) consider that there would be some less than substantial harm to townscape and heritage significance. Neither Southwark officers nor Historic England consider that this harm would be 'substantial', as defined by the NPPF, and Southwark officers do not consider that the degree of harm would warrant refusal of this planning application. Members need to assess the degree of harm and be satisfied that it would be outweighed by the other substantial regeneration benefits of this proposal.

Trees

334. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
335. The submitted arboricultural impact assessment proposes the removal of all trees on the site. These include a total of 28 existing small to medium sized trees including two tree groups consisting mostly of Tree of Heaven together with Birch and Cherry. The trees have been poorly managed and constrained by the car park setting. In total, the development would require the removal of 12 Category B, 15 C and 1 Category U trees and groups. All of these trees would require removal to facilitate the proposed development.
336. These trees can be adequately replaced within the proposed landscape plan so there would be a net gain in tree canopy cover when compared to the existing; this is a positive biodiversity benefit of the proposals. In total, 117 new trees would be planted. The tree strategy divides the new trees into four categories as described below:
- marker trees to provide distinctive focal points at key entrances and nodes;
 - avenue trees to provide strong lines and reinforce key routes;
 - parkland trees add seasonal interest, variety and biodiversity in the linear park and courtyards;
 - street trees provide greening of streets and are selected to be particularly suitable for the urban environment.
337. To further mitigate the loss of existing trees, a large number of the replacements would be planted at semi mature sizes, details of which can be reserved by condition. Tree planting on the upper level podium gardens would be planted in consideration of size, and blocking sunlight.
338. The removal of trees facing Old Kent Road would be acceptable provided that sufficient space has been allowed for their replacement, and taking into account any below ground constraints. Transport for London have stated that a Section 278 agreement should be entered into which would give the opportunity for detailed discussion about issues such as the acceptability and potential species of street tree. Accordingly, the applicant would be required to enter into this agreement by the S.106.

Housing mix

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

The draft OKR AAP and NSP policies also include the same mix requirements. The proposed overall housing mix and affordable housing mix is detailed below.

Table: Overall housing mix

Unit size	No. of units	% units
Studio	43	4%
1 bed	400	36%
2 bed	492	44%
3 bed	160	14%
4 bed	18	2%
Total	1113	100%

Table: Affordable housing mix

Unit size	No. of units	% units
Studio	0	0
1 bed	140	39%
2 bed	122	33%
3 bed	98	27%
4 bed	3	1%
Total	363	100%

340. At 4%, the number of studio flats is well within the 5% limit and so is acceptable. 60% of units would have two or more bedrooms; this meets the 60% target. However, overall, just 16% of the units would have three or more bedrooms, which is below the 20% requirement. For the affordable housing however, the housing mix fully meets the policy requirements. 61% of the units would have two or more bedrooms and 28% would have three bedrooms or more. So whilst there is a shortfall in three bedroom units overall, the percentage of three bedroom units in the affordable housing mix would be fully compliant. The housing mix is therefore found to be acceptable. It should also be noted that the GLA support the housing mix, recognising the high proportion of family sized units that would be secured in the affordable provision.

Wheelchair housing

341. Saved policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users and London plan policy 3.8 requires 90% of new housing to meet Building regulations M4(2) “accessible and adaptable” and 10% to meet Building Regulations M4 (3) “wheelchair user dwellings”. This is reiterated in emerging policy in the draft OKR AAP and the NSP.
342. 119 wheelchair units (10.6%) would be provided to meet the M4 (3) standard, and secured by the legal agreement. The units would be provided in the social, intermediate and private tenures in a range of unit sizes. The social rented and intermediate units would be required to be fully fitted for first occupation, with private units being adaptable. 97% of the units would achieve the M4 (2) standard, meeting the 90% target. The only units that would not meet the M4 (2) standard are the 13 maisonettes and 15 houses where step free access would not be possible unless a stair lift was fitted.

Quality of accommodation

343. Saved Policy 4.2 of the Southwark Plan states that development should achieve good quality living conditions and include high standards of accessibility, privacy and outlook, natural light, ventilation, space, safety and security and protection from pollution. This policy is further reinforced by the Residential design Standards SPD 2011 (including 2015 Technical Update).
344. All of the proposed dwellings have been designed to a high standard to ensure appropriate living accommodation for residents.

Unit size

345. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD.
346. The following table sets out the minimum flat size requirements as set out in the Residential Design Standards 2011, and also the flat sizes that would be achieved:

Unit Type	SPD (sqm)	Size Range (sqm)
Studio	36	39.9-56.6
1 Bed (flat)	50	50-74.2
2 Bed (flat)	61-66	65.2-84
3 Bed (flat)	74-85	79.8-147.7
4 Bed (flat)	90-99	136.7-201.9

347. The flat sizes meet and in most cases significantly exceed the standards as set out in the SPD. Space has been allocated for storage and all kitchens enjoy natural light and ventilation. The bathrooms are primarily mechanically ventilated and artificially lit, but this is not unusual for a relatively dense flatted scheme.
348. Every unit meets the minimum floorspace standard or exceeds it as follows:
- All of the studio flats, the two beds, the three beds and four beds all exceed the minimum requirement.
 - For the studio flats, the minimum floorspace requirement is exceeded by almost 4sqm.
 - For the 2 bed flats the minimum floorspace standard is also exceeded by at least 4sqm.
 - For the 3 bed flats the minimum floorspace standard is exceeded by at least 5.8sqm.
 - For the 4 bed flats the minimum floorspace standard is exceeded by at least 46.7sqm.
 - For the 1 bed flats, there are a number of flats which are on the limit of 50sqm, and a number that go just marginally beyond the minimum at 50.1sqm, 50.2sqm, 50.3sqm and 50.8sqm. The total number of flats affected is 124, and these are contained within Block B and Block C. All of these units would contain a private balcony or winter garden as mitigation, and have included bulk storage.

349. In addition, all of the three bedroom affordable units include the following:

- separate kitchens and dining rooms;
- provision for washing machines to be located in hall cupboards instead of the kitchen;
- general storage to be accessed off the dwellings circulation space and not off bedrooms;
- storage cupboards no deeper than 1m for ease of use; and
- private amenity space located off the living area.

350. Overall, it is therefore considered that the flat sizes and layouts are acceptable, and would provide for a very good standard of internal amenity.

Dual aspect

351. The percentage of dual aspect units would be very good at 64% and whilst there would be some flats that would have a sole frontage onto the Old Kent Road (total 32 flats within Block B), these would benefit from a fully enclosed winter gardens on the return corner.

352. As mentioned elsewhere in the report, the 'back to back' townhouses in Block A have revised their design following the Design Review Panel. Whilst they would be single aspect, they incorporate a light well to the rear allowing natural light to permeate all levels, and have rear bath and stairwell windows to achieve some natural cross ventilation. Furthermore, they are generously proportioned, laid out over three storeys with well defined private roof terraces integrated into the design. As such, they would provide high quality living environments that are likely to be highly desirable.

353. There would also be some single aspect flats in the maisonette block in Block A. However, there are many aspects of the design that mitigate the potential harm of this. For example, each core would only serve two dwellings per floor, over a total of four floors. Each core would also give access to a communal roof terrace and each unit would have generous private amenity space and well proportioned windows.

354. Taking into account the high density of the scheme, the level of dual aspect accommodation is considered very good with the successful use of gaps and breaks in the blocks.

Internal daylight

355. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.

356. The submitted daylight report demonstrates that the internal daylight provision within the development is "very good". 83.3% of all habitable rooms would meet or exceed the recommendation for Average Daylight Factor.

Block A

357. 626 (95.7%) of all the 654 habitable rooms meet or exceed the BRE recommendation for daylight quantum (ADF) and 552 (84.4%) of them achieve the recommended level for sky visibility (NSL). A further 6 living/kitchen/dining rooms achieve the recommendation of 1.5% ADF for living areas, and 13 rooms fall marginally short (0.1-0.2% ADF) of the respective living room, study, dining room or bedroom recommendations. Therefore, 645 (98.6%) out of the 654 habitable rooms tested will offer adequate daylight levels for an urban setting.
358. Of the rooms seeing lower levels of daylight ingress, one is an open plan living/kitchen/dining area, two are living rooms, two are studies, three are kitchens and one is a bedroom. The living rooms, the living/kitchen/dining area and the bedroom seeing lower daylight levels are all located at ground floor. However, these rooms are generously sized, thus receiving lower daylight levels at the rear, and are also provided with private amenity spaces in the form of terraces. The two studies are located at first floor and are part of generously sized units that are both provided with additional and very well day-lit study rooms. All the kitchens are located in units whose living areas see good levels of daylight.

Block B

359. 1155 (87.6%) of all the 1318 habitable rooms meet or exceed the BRE recommendation for daylight quantum (ADF) and 1056 (80.1%) of them achieve the recommended level for sky visibility (NSL). A further 11 living/kitchen/dining rooms and a further three studio-flats achieve the recommendation of 1.5% ADF for living areas, and 77 rooms fall marginally short (0.1-0.2% ADF) of the respective living room or bedroom recommendations. Therefore, 1246 (94.5%) out of the 1318 habitable rooms tested will offer occupants adequate daylight levels. Of the rooms seeing lower levels of daylight ingress, 11 are open plan living/kitchen/dining area, 24 are living rooms and 37 are bedrooms.
360. The living rooms and living/kitchen/dining areas seeing lower daylight levels are located at the lower floors, however, they are generous in size and most of them are provided with private amenity spaces in the form of balconies, which typically reduce the daylight ingress. This can be considered an acceptable trade-off between daylight amenity and outdoor private amenity space. The vast majority of the proposed bedrooms meet or exceed the recommended levels of daylight. Rooms with reduced daylight levels are common in developments located in urban areas, especially on the lowest floors. However, owing to the design team's efforts to prioritise good daylight within the main living spaces, a few bedrooms see levels of daylight below recommendation.

Block C

361. 1033 (85.1%) of all the 1214 habitable rooms meet or exceed the BRE recommendation for daylight quantum (ADF) and 1054 (86.8%) of them achieve the recommended level for sky visibility (NSL). A further three living/kitchen/dining rooms achieve the recommendation of 1.5% ADF for living areas, and 91 rooms fall marginally short (0.1-0.2% ADF) of the respective living room, kitchen or bedroom recommendations. Therefore, 1127 (92.8%) out of the 1214 habitable rooms tested will offer occupants adequate daylight levels. Of the rooms seeing lower levels of

daylight ingress, four are open plan living/kitchen/dining areas, 18 are kitchens and 65 are bedrooms.

362. The four open plan living/kitchen/dining areas seeing lower daylight levels are generously sized and designed to offer the possibility of enclosing the kitchen and having a separate living room. In this layout, the living area would provide acceptable daylight levels. In addition, these rooms are provided with access to a well day-lit winter-garden, where occupants will be able to enjoy good daylight levels throughout the year. The design of Block C has aimed to provide very good levels of daylight in all living areas. All of these rooms are also provided with balconies or winter-gardens. As a result, a few bedrooms are recessed from the external façade and see lower levels of daylight. However, all of them would have access and outlook to those amenity areas where higher daylight levels can be enjoyed. The few kitchens falling short of recommendation are all located in units with good daylight levels in the living areas.
363. In conclusion, the provision for daylight amenity in the proposed development is considered very good overall and the design has made the most of the available daylight.

Overlooking within the scheme

364. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.
365. The majority of the development exceeds the minimum distance requirements except for the distances between building B.1 and building B.4 where the distance is 11 metres, where it should be a minimum of 21m, and the distance between building A.1 and the maisonette development as part of Block A is 5 metres, where as it should be a minimum of 21m.
366. To mitigate detrimental impacts due to these distances all of the units in B.1 and B.4 benefit from dual aspect windows with the alternative window where the dimensions are exceeded. Regarding building A.1 and the maisonettes the windows are only secondary and all rooms have a primary window that faces a different direction which complies with the minimum distance requirements of the council's SPD.
367. The design of the layout between buildings C.1 and C.2 including the splaying of the external walls and positioning of windows is just under 12 metres across 11 storeys. However, the splayed orientation of the windows mitigates the possibility of overlooking.
368. It is therefore considered that the overlooking distances within the scheme are acceptable, when taking into account the mitigating factors of the design.

Amenity space

369. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10 sqm per child

bed space (covering a range of age groups). In addition, emerging policy 10 of the AAP states that each dwelling should make a contribution of 5sqm towards open space.

370. In terms of the overall amount of amenity space required, the following would need therefore need to be provided:
- a) Private amenity space. For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD; and for units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
 - b) Communal amenity space. 50sqm communal amenity space per block as required by the SPD; and
 - c) Children's play space. 10sqm of children's play space for every child space in the development as required by the London Plan.
 - d) Public open space. 5sqm of public open space per dwelling as required by the OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private amenity space

371. A very positive aspect of the scheme is that all flats have been provided private amenity space in the form of a balcony, winter garden or terrace. The three bed units have also been provided with at least 10sqm of private amenity space which meets the SPD requirement. There are some instances where the smaller one and two bed units do not provide 10sqm and therefore the balance has been added to the communal amenity space as detailed in the following paragraphs. 11 studio flats have not been provided with any form of private amenity space. In mitigation, the internal area of each studio has been increased by 4sqm over and above the minimum standard to ensure the quality of accommodation is not compromised.

Communal amenity space

372. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. The table below sets out the shortfall of private amenity space in each block.

Table: Private amenity shortfall

Block	Shortfall
Block A	337sqm
Block B	1,193sqm
Block C	1,580sqm
Total	3,110sqm

373. In addition, the SPD requires 50sqm per block, of which three blocks are proposed (total 150sqm). The total amount of communal amenity space that would be required is therefore 3,260sqm. In total, 3,632sqm of space would be provided, which exceeds the required amount by 372sqm. This would be provided on the Block A and Block B communal roof terraces (1,310sqm), the Block B podium (2,095sqm) and the Block C 1 internal amenity room (227sqm).

Children's play space

374. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG, the development would be expected to contribute 3,400sqm of children's play space, based on the requirement for 10sqm for every child (total 340 children). The child yield calculation is as set out in the following table.

Table: Child yield calculation

	<u>Number of children</u>
Under 5	164
5 to 11	109
12+	67
Total	340

375. In total, 3,610sqm of children's playspace would be provided in the development, as detailed in the table below. The level of provision exceeds the required provision of 3,400sqm by 210sqm and is accordingly a positive aspect of the scheme.

Table: Children's playspace

Age group	Area required	Area provided	Location
Dedicated under 5's	1,640sqm	330sqm	Block A courtyard and Block B courtyard
Dedicated 5-11's	1,090sqm	490sqm	Linear park
Dedicated 12+	670sqm	530sqm	Linear park (includes long jump provision)
Playable landscape	-	2,260sqm	Linear park and public square
TOTAL	3,400sqm	3,610sqm	

376. Designated equipped play space for all ages would be provided and play features would be fully integrated into the landscape design to provide an attractive and versatile public realm. As well as incorporating play space within the Block A courtyard, the Block B podium courtyard would also include some provision. In addition, informal play opportunities would be incorporated throughout the public realm in the form of playful furniture such as the benches found on the Southbank and open spaces for active play. Provision for a long jump would also be added in the linear park which is a positive addition to the scheme.
377. Further design details of the proposed play space within the scheme will be secured by condition.

Public open space

378. Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open

space per dwelling. In this case, this would amount to 5,565sqm based on the 1,113 units proposed.

Table: Public open spaces

Amenity	Area (sqm)
Linear park	3,510
Urban square	1,090
Total	4,600

379. In total, 4,600sqm of public open space would be provided based on the 3,510sqm linear park and the 1,090sqm of urban square, amounting to a 965sqm shortfall. The Block A courtyard has not been counted since this would be private.
380. Although policy AAP10 currently has limited weight, the applicant has agreed to make the full contribution of £197,825 for the 965sqm shortfall proposed (at a cost of £205 per sqm as set out in the section 106 SPD) which would be spent on landscaping the Frensham Street park.
381. A further benefit of the scheme is that all residents would have access to the communal amenity room at the 46th floor of Block C (the tallest tower), and some limited public access would also be offered, details of which can be secured by the legal agreement.

Overshadowing

382. An overshadowing analysis has been carried out of all public and communal and outdoor areas within the site. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least 50% of the area should receive at least two hours of sunlight on 21st March.
383. The results of the assessment show that 83% of all proposed public open space would see two hours of direct sunlight on 21st March, where 50% represents the recommended target for each amenity space.
384. A further breakdown per area shows that the linear park will be very well sunlit throughout the year with 98.4% of the area receiving more than two hours of sunlight on the 21st March, whilst only 33.5% of the public square sees more than two hours of direct sunlight in that date. However, most of the public square would see between one and half and two hours of sunlight on the 21st March. The sun exposure increases greatly throughout the summer, when users are more likely to make use of the space. Overall, it is considered that the scheme delivers a very good level of sunlight amenity for the public and communal spaces.
385. The draft OKR AAP has purposefully identified sites for taller buildings to the north of the linear park such that they do not cast significant shadows over the new open space. This includes the proposal at Cantium and the live application at Malt Street. The emerging proposal for a new open space at the Frensham Street Depot would also benefit from the same principle given the taller buildings proposed are located to its north.

Secured by design

386. The applicant met with Designing Out Crime Officers of the Metropolitan Police, to review the design of the scheme and allow for appropriate security measures to be suitably incorporated into the development. It was agreed that the following security measures be included:- controlled access to the basement and full segregation from the upper floors, CCTV to the cycle store area, a uniform level of light to basement car parking and all external public realm and undercrofts. It was also accepted that the destination space included within the development would contribute to natural surveillance as it would include night time activities. The new areas of active frontage along the Old Kent Road would also discourage anti social behaviour.
387. The Metropolitan Police, in their consultation response to the application stated that the proposed development is on track to achieve Secured By Design accreditation. It is therefore appropriate to attach a 'Secured by Design' condition for the whole development.

Units per core

388. Standard 12 of the Mayor's Housing Design SPG requires that each core should be accessible to generally no more than eight units on each floor. As stated in the Exemplary design standards table, all of the cores in the development with the exception of Block B3 have 8 flats per core, with B3 having 9 flats per core from floor levels 02 to 09.
389. In the instance where the eight flats per core is exceeded in Block B3 the corridor is designed with a predominantly straight walkway with the unit (no.3) at the eastern end of the building being placed on a corner. The unit is a 3 bedroom four person flat at 80.3sqm. The entrance door is to the immediate east of the door providing entrance to unit no. 4. By proposing a larger unit on the eastern end, the size of the flat and its entrance point successfully reduces the perception of the number of units within Block B3. 9 flats per core should therefore be accepted here taking into account the specific layout of the core.

Conclusion on quality of accommodation

390. To conclude, officers are satisfied that the quality of residential accommodation proposed would be high and would justify the high density of the scheme. The units flats would be provided with bulk storage which is a positive aspect of the design and the clear majority of the units would exceed the minimum requirement for floor sizes.
391. The percentage of dual aspect until would be very good at 64% and whilst there would be some single aspect flats (total no. 32) within the Block B tower on the Old Kent Road, these units would benefit from winter gardens on the return corner. The single aspect flats and townhouses in Block A have included specific design features to mitigate the single aspect and would provide very good quality accommodation overall.
392. The accommodation would achieve very good internal daylight levels including good privacy and outlook and a very good provision of outdoor amenity space and children's play space, as well as the other major regeneration benefits of the scheme. All flats apart from the studios would have private amenity space provided.

Density

393. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site is located within the Urban Density Zone, a density range of 200 to 700 habitable rooms per hectare would be sought. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
394. The development as a whole would have a density of 2,353 habitable rooms per hectare (hrh), calculated in accordance with the Residential Design Standards SPD 2011. This has been worked out on the basis of the total non residential floorspace of 19,833sqm GIA, 3,280 residential habitable rooms and a site area of 1.7ha (which excludes the Olmar Street strip). The GLA, in their stage 1 report considered the site to have a lower density of 1,731 habitable rooms per hectare, on the basis of London Plan calculation method which differs from the council's SPD.
395. Since the maximum upper limit of 700 hrh would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then it's considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission. This is considered in the following table and paragraphs.

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	<p>The 2015 Technical update to the Residential Design Standards 2011 provides tabular information on how much storage should be provided for a one, two, three, four, five and six bed unit.</p> <p>One bed = 1 to 1.5sqm Two bed = 2sqm Three bed = 2.5sqm Four bed = 3sqm Five bed = 3.5sqm Six bed = 4sqm</p> <p>All bedroom quantities proposed within this development exceed each respective sqm requirement.</p>
Exceed minimum privacy distances	The Council's 2015 Technical update to the Residential Design Standards 2011

	<p>encourages the mitigation of overlooking from new developments by achieving a minimum distance of 12 metres at the front of a building and any elevation that fronts onto a highway and a minimum distance of 21 metres at the rear of a building.</p> <p>The majority of the development exceeds the minimum distance requirements except for the distances between of Building B.1 and Building B.4 where the distance is 11 metres, and the distance between building A.1 and the maisonette development as part of Block A is 5 metres.</p> <p>To mitigate detrimental impacts due to these distances all of the units in B.1 and B.4 benefit from dual aspect windows with the alternative window where the dimensions are exceeded. Regarding A.1 and the maisonettes the windows are only secondary and all rooms have a primary window that faces a different direction which complies with the minimum distance requirements of the Council's SPD.</p> <p>The design of the layout between C.1 and C.2 including the splaying of the external walls and positioning of windows is just under 12 metres across 11 storeys. However, the splayed orientation of the windows mitigates the possibility of overlooking.</p> <p>The closest residential occupiers not part of the development is the terraced row to the northeast of the site, comprising of nos. 533-541 Old Kent road. No. 533 is approximately 34 metres from the edge of Block B, with no. 541 being approximately 58 metres to the northeast.</p>
<p>Good sunlight and daylight standards</p>	<p>The submitted daylight report demonstrates that the internal daylight provision within the development is "very good". 83.3% of all habitable rooms would meet or exceed the recommendation for Average Daylight Factor.</p>

<p>Exceed minimum ceiling heights of 2.30 metres</p>	<p>The floor to ceiling heights in Block A range from 2.49 metres on the ground floor, with the upper floors being 2.49 metres.</p> <p>Block B floor to ceiling heights are identical to that of the above.</p> <p>At the ground floor level of Block C the floor to ceiling height is 6.28 metres with the upper floors being a minimum of 2.26 metres and a maximum of 2.63 metres.</p>
<p>Exceed amenity space standards (both private and communal)</p>	<p>Block A contains low rise residential buildings A. II and A. III. Each building provides access to roof terraces.</p> <p>Additionally, 805sqm of amenity space is provided within the proposed courtyard of Block A. The units in the mid rise of Block A would have projecting balconies that are finished in dark grey.</p> <p>Within Block B, the street facing units of B.I have fully enclosed winter gardens. B. II, B. III, and B. IV make up the low rise buildings that provide residential maisonette units all have terraces on the upper floors levels with the ground floor having access to the podium area.</p> <p>In both buildings that make up block C, every residential unit has access to private amenity spaces in form of balconies and/or a winter garden space.</p>
<p>Secure by Design certification</p>	<p>The development is on track to achieve this certification. A meeting with the Metropolitan Police Design Officer was held and the recommendations made have been included.</p>
<p>No more than 5% studio flats</p>	<p>The overall development proposes 43 (4%) of all units being Studio flats.</p>
<p>Maximise the potential of the site</p>	<p>The potential of the site has been maximised by incorporating a mix of uses as well as generous public open spaces that include a public square and linear park.</p>

<p>Include a minimum of 10% of units that are suitable for wheelchair users</p>	<p>119 of the 1,113 residential units will be for wheelchair user dwellings. This amounts to 10.5% of the development.</p>
<p>Have excellent accessibility within buildings</p>	<p>The accessibility to each of the buildings that form the proposal is acceptable. Additionally, with respect to each building, there is generous access provided to the proposed public square and linear park.</p> <p>Step free access would be provided to all parts of the site including access to the retail and commercial units.</p>
<p>Have exceptional environmental performance</p>	<p>The submitted Energy Strategy proposes a development that would reduce carbon emissions, utilise energy efficient methods and facilitating renewable energy sources. The development takes into consideration the hierarchy outlined in the London Plan:</p> <ul style="list-style-type: none"> • Be lean: Use Less Energy – Energy demand reductions are to be realised throughout the scheme via the specification of an optimised building fabric and the inclusion of energy efficient building service systems • Be clean: Supply Energy Efficiency – The proposed CHP plant is designed to cogenerate electricity and heat in a single combustion process and thereby reduce energy consumption, associated CO2 emissions and energy costs. This plant will serve residential units, offices, retail units and destination space • Be green: Use Renewable Energy – Roof mounted PV arrays are proposed to provide a green source of electricity to be utilised on site in the commercial units and Air Source Heat Pumps are proposed to serve the Townhouse element of the scheme in Block A. <p>The analysis of the Energy Strategy demonstrates that through the</p>

	development, a cumulative carbon emission saving of 38% for residential floorspace and 36% of non-residential floorspace would be achieved.
Minimise noise nuisance between flats by stacking floors so that the bedrooms are above bedrooms, lounges above lounges	The submitted plans for each of the floor levels containing residential units within all buildings show a layout where bedrooms are stacked on bedrooms; this is replicated with living areas on top of living areas.
Make a positive contribution to local context, character and communities	The development would make a positive contribution to the local context through the re-provision of floorspace for the Halfords and Pets At Home companies. Additionally, the mixed-use nature of the scheme provides very good employment opportunities.
Include a predominance of dual aspect units	<p>The percentage of dual aspect until would be very good at 64% and whilst there would be some flats that would have a sole frontage onto the Old Kent Road (total 32 flats within Block B), these would benefit from a fully enclosed winter gardens on the return corner.</p> <p>As mentioned elsewhere in the report, the 'back to back' townhouses have revised their design following the Design Review Panel to achieve natural lighting and cross ventilation from the rear bathroom and stair windows. Whilst these are still considered to fit the single aspect definition, cross ventilation and lighting from the rear windows would be achieved.</p>
Have natural light and ventilation in all kitchens and bathrooms	<p>The majority of proposed kitchens form part of an 'open plan development' which provides kitchen, dining and living into one room. The open plan developments within each residential unit would receive sufficient natural light and ventilation.</p> <p>The positioning of the bathrooms is away from majority of window openings therefore not achieving natural light opportunities, but they would be mechanically ventilated. The bathrooms in the back to back houses would be</p>

	both naturally lit and ventilated.
At least 60% of units contain two or more bedrooms	670 of the 1,113 units proposed in this scheme would consist of two or more bedrooms. This amounts to 60% of the entire development.
Significantly exceed the minimum floor space standards	<p>Every unit meets the minimum floorspace standard.</p> <p>All of the studio flats, the two beds, the three beds and four beds all exceed the minimum requirement.</p> <p>For the studio flats, the minimum floorspace requirement is exceeded by almost 4sqm.</p> <p>For the 2 bed flats the minimum floorspace standard is also exceeded by at least 4sqm.</p> <p>For the 3 bed flats the minimum floorspace standard is exceeded by at least 5.8sqm.</p> <p>For the 4 bed flats the minimum floorspace standard is exceeded by at least 46.7sqm.</p> <p>For the 1 bed flats, there are a number of flats which are on the limit of 50sqm, and a number that go just marginally beyond the minimum at 50.1sqm, 50.2sqm, 50.3sqm and 50.8sqm. These are located in Blocks B and C. The total number of flats affected is 124.</p> <p>All of these units would contain a private balcony or winter garden and bulk storage as mitigation.</p>
Minimise corridor lengths by having additional cores	Almost all of the buildings within the development would have no more than 8 flats per core, complying with the Mayor's Housing Design SPG which advises no more than 8 flats per core. The only exception is Block B3 which has 9 flats per core over levels 02 to 09. This is discussed in further detail in paragraph 396.

Conclusion on density

396. For the reasons detailed in the above table, the quality of the accommodation can support the high density since it provides for bulk storage, mitigates satisfactorily where overlooking standards cannot be reached, achieves very good daylight standards and in the clear majority of instances the minimum floorspace standards would be exceeded. The scheme includes a predominance of dual aspect flats at 64%. In addition, all units apart from the studio flats have a balcony or winter garden. There would be one core which includes 9 flats per core but the detailed layout is considered to mitigate this.

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

397. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.

Impact of the proposed uses

398. The site has been operating as the Cantium Retail Park since 1991. The re-provision of retail uses, as well as new uses such as residential, offices and destination space would be compatible with the surrounding land uses which include residential, retail and other commercial uses. Opening hours for the destination space would be secured by condition, and noise from machinery and plant can also be adequately dealt with by condition to ensure that no harm to surrounding residential amenity would occur. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, and accordingly are all found to be acceptable uses.

Overlooking to surrounding neighbours

399. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.
400. The nearest existing residential properties on the other side of the Old Kent Road (nos. 541-553) are over 30m away, with other properties on Rotherhithe New Road and Peckham Park Road well over 70m away, thereby fully achieving the minimum 21m required. Overlooking distances to the submitted schemes at Malt Street and Civic Livesey would also be sufficiently distanced to prevent harmful overlooking.

Daylight

401. A daylight and sunlight report has been submitted as part of the ES, based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
402. The BRE sets out three detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted and the one used in the submitted

report. 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 can be reduced by about 20% of their original value before the loss is noticeable.

403. The second method is 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.

404. The submitted report has taken into account the daylight and sunlight impacts for surrounding residential buildings which are in residential use.

- 549, 547, 545, 553, 543B, 541D, 551, 525-539 Old Kent Road;
- 610 Old Kent Road;
- Denstone House;
- 36, 40-44 (even), 48, 50-56 (even), 72-92 Latona Road (even);
- Greystoke House;
- Peckham Park Road;
- 36-38 Latona Road;
- 38, 46, 50 Latona Road

Image: Location of surrounding residential buildings



405. A total of 1,553 windows serving 1,159 rooms within 59 residential buildings have been assessed for daylight.

406. Regarding daylight conditions in the baseline (existing) scenario, 949 (61%) of the 1,553 windows assessed meet the BRE criteria for VSC by achieving a VSC level of 27 % or above. For NSL, 1079 (93%) out of the 1,159 rooms assessed meet the BRE criteria with 80% or above daylight distribution.
407. The technical assessments outlined within the Baseline Daylight and Sunlight section were repeated with the proposed development in place. Again, a total of 1,553 windows serving 1,159 rooms were assessed within 59 surrounding residential buildings. For VSC, 1,325 (85%) of the 1,553 windows assessed would meet the BRE criteria and for NSL 1,142 (99%) of the 1,159 rooms assessed would meet the BRE criteria.
408. Professional judgement has been used to determine whether the impact would result in adverse or beneficial daylight and sunlight effects. The numerical criteria for determining the scale of effect is based on percentage alterations, as follows:
- 0-19.9% alteration = negligible
 20-29.9% alteration = minor
 30-39.9% alteration = moderate; and
 40% alteration = major
409. The 44 buildings included within the table below would not experience a noticeable alteration (less than 20%) in the levels of daylight it receives with the completed proposed development in place and it is therefore considered that these properties would experience a negligible effect.

Table: Compliant VSC properties - 44

Address	Total no. of windows	No. of windows that meet BRE criteria	Below BRE guidelines			
			20-29.9% reduction	30-39.9% reduction	>40% reduction	Total
Denstone House	78	78	0	0	0	0
36, 40, 42, 44, 48, 52, 54, 56, 72 Latona Road	4	4	0	0	0	0
74-92 Latona Road	7	7	0	0	0	0
Greystoke House	77	77	0	0	0	0
36-38 Latona Road	2	2	0	0	0	0
38 Latona Road	4	4	0	0	0	0

46 Latona Road	4	4	0	0	0	0
50 Latona Road	4	4	0	0	0	0
48-86 Latona Road	3	3	0	0	0	0
1, 3, 5,7, 9 Peckham Park Road	4	4	0	0	0	0
10, 12 Peckham Park Road	1	1	0	0	0	0
14 Peckham Park Road	2	2	0	0	0	0
18 Peckham Park Road	5	5	0	0	0	0
Northfield House	463	463	0	0	0	0
21-30 Millbrook House	52	52	0	0	0	0
11, 13, 15 Peckham Park Road	2	2	0	0	0	0
17, 19 Peckham Park Road	4	4	0	0	0	0
21 Peckham Park Road	2	2	0	0	0	0
Cardiff House	121	121	0	0	0	0

410. As well as the 44 properties listed in the above VSC table, a total of 52 properties would achieve compliance with the NSL criteria. The list of properties that would achieve compliance with the NSL criteria are listed in the table below.

Table: Compliant NSL properties - 52

Address	Total no. of rooms	No. of rooms that meet the 0.8 times former value criteria	Below BRE guidelines			
			20-29.9% reduction	30-39.9% reduction	>40% reduction	Total
545 Old Kent Road	5	5	0	0	0	0
543B Old Kent Road	5	5	0	0	0	0
541D Old Kent Road	5	5	0	0	0	0
610 Old Kent Road	21	21	0	0	0	0
Denstone House	78	78	0	0	0	0
36 Latona Road	4	4	0	0	0	0
40, 42, 44, 48, 52, 54, 56 Latona Road	2	2	0	0	0	0
72-92 Latona Road	4	4	0	0	0	0
Greystoke House	42	42	0	0	0	0
36-38 Latona Road	1	1	0	0	0	0
38, 46, 50 Latona Road	2	2	0	0	0	0
48-86 Latona Road	1	1	0	0	0	0
1, 3, 5,7, 9 Peckham Park Road	4	4	0	0	0	0
10, 12 Peckham Park Road	1	1	0	0	0	0
14 Peckham Park Road	2	2	0	0	0	0
18 Peckham	5	5	0	0	0	0

Park Road						
20 Peckham Park Road	2	2	0	0	0	0
22 Peckham Park Road	6	6	0	0	0	0
Northfield House	319	319	0	0	0	0
Ednam House	300	300	0	0	0	0
21-30 Millbrook House	49	49	0	0	0	0
11, 13, 15 Peckham Park Road	2	2	0	0	0	0
17, 19 Peckham Park Road	4	4	0	0	0	0
21 Peckham Park Road	2	2	0	0	0	0
Cardiff House	90	90	0	0	0	0

411. The impacts on the remaining 15 properties are summarised in the table below and discussed in the following paragraphs.

412. It must be noted that where the uses of the affected rooms are unknown, there is a possibility that some rooms are non-habitable i.e. bathrooms and hallways or are rooms considered less sensitive to daylight such as bedrooms within the BRE Guidelines.

Table: Non compliant VSC properties (15)

Address	Total no. of windows	No. of windows that meet BRE criteria	Below BRE guidelines			
			20-29.9% reduction	30-39.9% reduction	>40% reduction	Total
549 Old Kent Road	17	0	0	3	14	17
547 Old Kent Road	11	0	0	2	9	11
545 Old Kent	12	0	1	6	5	12

Road						
553 Old Kent Road	9	0	0	1	8	9
543B Old Kent Road	12	1	0	10	1	11
541D Old Kent Road	13	1	1	10	1	12
551 Old Kent Road	11	0	0	0	11	11
525-529 Old Kent Road	71	33	12	18	8	38
610 Old Kent Road	24	20	4	0	0	4
6 Peckham Park Road	6	3	2	1	0	3
8 Peckham Park Road	2	1	1	0	0	1
20 Peckham Park Road	2	1	1	0	0	1
22 Peckham Park Road	7	4	3	0	0	3
Ednam House	300	235	65	0	0	65
399 Rotherhith e New Road	88	62	19	7	0	26

Table: Non complaint NSL properties (7)

Address	Total no. of rooms	No. of rooms that meet 0.8 times former value	Below BRE guidelines			
			20-29.9% reduction	30-39.9% reduction	>40% reduction	Total
549 Old Kent Road	7	5	0	1	1	2
547 Old Kent Road	5	4	0	1	0	1
553 Old Kent Road	0	0	1	1	7	9
551 Old Kent Road	5	4	1	0	0	1
525-529 Old Kent Road	41	40	1	0	0	1
6 Peckham Park Road	5	4	1	0	0	1
8 Peckham Park Road	2	1	1	0	0	1

413. The impacts on each of the 15 properties listed in the tables above is discussed below.

549 Old Kent Road

414. A total of 17 windows serving 7 rooms serving seven rooms were assessed for daylight within this residential building.

415. For VSC, none of the windows assessed would meet the BRE criteria.

416. Of the affected windows, three would experience alterations between 30-40% which is considered moderate adverse. The remaining 14 affected windows would experience alterations in excess of 40% which is considered major adverse. The worst affected window (W1/F00) would experience a reduction of 64%, resulting in a change in VSC from 7.5% as existing, to 2.7%. The proposed VSC values would range from 2.7% to 22.7% VSC.

417. For NSL, five of the seven rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.

418. Of the two NSL affected rooms, one would experience alterations between 30-40% which is considered moderate adverse. The remaining affected room would experience alterations in excess of 40% which is considered major adverse. However, the NSL results demonstrate that the two affected rooms would still benefit from direct skylight at desk height to over 39.4% and 64.6% respectively.
419. Overall and based on professional judgment, the effect to daylight within this residential building is considered to be major adverse and significant.

547 Old Kent Road

420. A total of 11 windows serving five rooms were assessed for daylight within this residential building.
421. For VSC, none of the windows assessed would meet the BRE criteria.
422. Of the affected windows, two would experience alterations between 30-40% which is considered moderate adverse. The remaining nine affected windows would experience alterations in excess of 40% which is considered major adverse. The worst affected window would be window W2/F00 which would see a reduction of 48.1% going from 26.6%, to 13.8% VSC. The proposed VSC values would range from 12.1% to 15.7%.
423. For NSL, four of the five rooms assessed would meet the BRE criteria and would experience a negligible effect.
424. The one affected room would experience alterations between 30-40% which is considered moderate adverse but this window would have still benefit from direct skylight at desk height to over 59.6% of the total room area.
425. Overall and based on professional judgment, the effect to daylight within this residential property is considered major adverse and significant.

545 Old Kent Road

426. A total of 12 windows serving five rooms were assessed for daylight within this residential building.
427. For VSC, none of the windows assessed would meet the BRE criteria.
428. Of the affected windows, one would experience an alteration between 20-30% which is considered a minor adverse effect. In addition, six windows would experience an alteration between 30-40% which is considered moderate adverse. The remaining five affected windows would experience alterations in excess of 40% which is considered major adverse. The levels of reduction would result in proposed VSC values of between 4.9% to 14.6%.
429. For NSL, all five rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
430. Overall and based on professional judgment, due to the majority of the affected windows ranging between 20-39.9%, and no effect to NSL, the effect to daylight within this residential building is considered to be moderate adverse and significant.

553 Old Kent Road

431. A total of nine windows serving nine rooms were assessed for daylight within this residential building.
432. For VSC, none of the windows assessed would meet the BRE criteria.
433. Of the affected windows, one would experience an alteration between 30-40 % which is considered moderate adverse. The remaining eight affected windows would experience alterations in excess of 40% which is considered major adverse. The proposed VSC values would range from 4.6% to 18.5%.
434. For NSL, none of the rooms assessed would meet the BRE criteria.
435. Of the affected rooms, one would experience alterations between 20-30% which is considered a minor adverse effect. In addition, one room would experience an alteration of between 30-40% which is considered moderate adverse. The remaining seven affected rooms would experience alterations in excess of 40% which is considered major adverse. These rooms would still benefit from direct skylight at desk height to over 47.3% of the total room area.
436. Overall and based on professional judgment, the effect to daylight within this residential building is considered to be major adverse and significant.

543B Old Kent Road

437. A total of 12 windows serving five rooms were assessed for daylight within this residential building.
438. For VSC, one of the windows assessed would meet the BRE criteria and is therefore considered to experience a negligible effect as it would experience reductions less than 20%.
439. Of the affected windows, one would experience alterations between 20-30% which is considered a minor adverse effect and 10 would experience an alteration between 30-40% which is considered moderate adverse. The proposed VSC values would range from 13.8%, to 25.7%.
440. For NSL, all five rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
441. Overall and based on professional judgment, due to the majority of the affected windows ranging between 20-39.9%, and no effect to NSL, the effect to daylight within this residential building is considered to be moderate adverse and significant.

541D Old Kent Road

442. A total of 13 windows serving five rooms were assessed for daylight within this residential building.
443. For VSC, one of the windows assessed would meet the BRE criteria and is therefore considered to experience a negligible effect as it would experience reductions less than 20%.

444. Of the affected windows, one would experience alterations between 20-30% which is considered a minor adverse effect. In addition, 10 windows would experience an alteration of between 30-40% which is considered moderate adverse. The remaining affected window would experience alterations in excess of 40% which is considered major adverse. The proposed VSC values would range from 4% to 26.4%. Whilst one window would be left with a VSC of 4%, the existing value is 4.8% so it is already compromised in its existing condition.
445. For NSL, all five rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
446. Overall and based on professional judgment, due to the majority of affected windows experiencing an alteration between 30-39.9%, the effect to daylight within this residential building is considered to be moderate adverse and significant.

551 Old Kent Road

447. A total of 11 windows serving five rooms were assessed for daylight within this residential building.
448. For VSC, none of the windows assessed would meet the BRE criteria.
449. Of the affected windows, all would experience alterations in excess of 40% which is considered major adverse. The proposed VSC values would range from 4.9% to 21.6%.
450. For NSL, four of the five rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
451. The one affected room would experience an alteration between 20-30% which is considered a minor adverse effect. This window would still benefit from direct skylight at desk height to over 75.4% of the total room area, which is considered a good level of daylight amenity in an urban location.
452. Overall and based on professional judgment, the effect to daylight within this residential building is considered to be major adverse and significant.

525-539 Old Kent Road

453. A total of 71 windows serving 41 rooms were assessed for daylight within this residential building.
454. For VSC, 33 of the 71 windows assessed would meet the BRE criteria and is therefore considered to experience a negligible effect.
455. Of the affected windows, 12 would experience alterations between 20-30 % which is considered a minor adverse effect. In addition, 18 windows would experience an alteration of between 30-40% which is considered moderate adverse. The remaining eight affected windows would experience alterations in excess of 40% which is considered major adverse. The worst affected window would be a W12/F01 which would see a reduction from 6.6% to 1.8% (72.7%). however this is a living kitchen diner which also receives light from three other windows which would retain very good

levels of daylight at 29.5%, 15.1% and 19.8%. The proposed VSC values would range from the 1.8% as described above, to 25.5%.

- 456. For NSL, 40 of the 41 rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
- 457. The one affected room would experience an alteration between 20-30% which is considered a minor adverse effect. This window would still benefit from direct skylight at desk height to over 77.5% of the total room area, which is considered a good level of daylight amenity in an urban location.
- 458. Overall and based on professional judgment, due to the majority of affected windows experiencing an alteration between 20-39.9%, and a high level of BRE compliance for NSL, the effect to daylight within this residential building is considered to be moderate adverse and significant.

610 Old Kent Road

- 459. A total of 24 windows serving 21 rooms were assessed for daylight within this residential building.
- 460. For VSC, 20 of the 24 windows assessed would meet the BRE criteria and is therefore considered to experience a negligible effect.
- 461. All four affected windows would experience alterations between 20-30% which is considered a minor adverse effect. It should be noted that all four of these affected windows range from 20.9% and 22.3% and are therefore marginally above the BRE recommendation of 20%. The proposed VSC values would remain good with values ranging from 13.9% to 33.5%.
- 462. For NSL, all 21 rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
- 463. Overall and based on professional judgment, the effect to daylight within this residential building is considered to be minor adverse and not significant.

6 Peckham Park Road

- 464. A total of six windows serving five rooms were assessed for daylight within this residential building.
- 465. For VSC, three of the six windows assessed would meet the BRE criteria and is therefore considered to experience a negligible effect.
- 466. Of the affected windows two would experience alterations between 20-30 % which is considered a minor adverse effect. The remaining window would experience alterations between 30-39.9% which is considered a moderate adverse effect. The proposed VSC values would range from 10.9% to 22.4%.
- 467. For NSL, four of the five rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
- 468. The one affected room would experience an alteration between 20-30% which is

considered a minor adverse effect. This window would still benefit from direct skylight at desk height to over 65.3% of the total room area, which is considered a good level of daylight amenity in an urban location.

469. Overall and based on professional judgment, the effect to daylight within this residential building is considered to be minor adverse and not significant.

8 Peckham Park Road

470. A total of two windows serving two rooms were assessed for daylight within this residential building.

471. For VSC, one of the two windows assessed would meet the BRE criteria and is therefore considered to experience a negligible effect.

472. The affected window would experience alterations between 20-30% which is considered a minor adverse effect. The VSC value on this window would reduce from 7.4%, to 5.7%.

473. For NSL, one of the two rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.

474. The affected room would experience alterations between 20-30% which is considered a minor adverse effect. This window would still benefit from direct skylight at desk height to over 17.4% of the total room area (21.8% as existing).

475. Overall and based on professional judgment, the effect to daylight within this residential building is considered to be minor adverse and not significant.

20 Peckham Park Road

476. A total of two windows serving two rooms were assessed for daylight within this residential building.

477. For VSC, one of the two windows assessed would meet the BRE criteria and is therefore considered to experience a negligible effect.

478. The affected window would experience alterations between 20-30% which is considered a minor adverse effect. This window would see a proposed VSC value of 19.5%.

479. For NSL, all rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.

480. Overall and based on professional judgment, the effect to daylight within this residential building is considered to be minor adverse and not significant.

22 Peckham Park Road

481. A total of seven windows serving six rooms were assessed for daylight within this residential building.

482. For VSC, four of the seven windows assessed would meet the BRE criteria and is

therefore considered to experience a negligible effect.

- 483. The affected windows would experience alterations between 20-30% which is considered a minor adverse effect. The proposed VSC values would range from 14.9% to 22.8%.
- 484. For NSL, all rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
- 485. Overall and based on professional judgment, the effect to daylight within this residential building is considered to be minor adverse and not significant.

Ednam House

- 486. A total of 300 windows serving 300 rooms were assessed for daylight within this residential building.
- 487. For VSC, 235 of the windows assessed would meet the BRE criteria and is therefore considered to experience a negligible effect.
- 488. Of the affected windows, all 65 would experience alterations between 20-30% which is considered a minor adverse effect. The proposed VSC values would range from 10.6% to 14.2%.
- 489. For NSL, all 300 rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
- 490. Overall and based on professional judgment, the effect to daylight within this residential building is considered to be minor adverse and not significant.

399 Rotherhithe New Road

- 491. A total of 88 windows serving 45 rooms were assessed for daylight within this residential building.
- 492. For VSC, 62 of the 88 windows assessed would meet the BRE criteria and is therefore considered to experience a negligible effect.
- 493. Of the affected windows, 19 would experience alterations between 20-30% which is considered a minor adverse effect. In addition, seven windows would experience an alteration of between 30-40% which is considered moderate adverse. The proposed VSC values would range from 9.7% to 18.7%.
- 494. It should be noted that this building has balcony's that may result in low existing values of daylight.
- 495. For NSL, 44 of the 45 rooms assessed would meet the BRE criteria and are considered to experience a negligible effect.
- 496. The one affected room would experience an alteration between 20-30% which is considered a minor adverse effect. This window would still benefit from direct skylight at desk height to 74.7% of the total room area.

497. Overall and based on professional judgment, due to the majority of affected windows experiencing an alteration between 20-29.9%, and a high level of BRE compliance for NSL, the effect to daylight within this residential building is considered to be minor adverse and significant.

Conclusion

498. The results of the daylight assessment do reveal that there would be a number of rooms that would not meet the relevant daylighting standards of the BRE, with properties on the opposite side of Old Kent Road, properties along Peckham Park Road, Ednam House, and 399 Rotherhithe New Road affected.
499. In these instances it is recognised that there would be a degree of harm to the daylight amenity of residents, but this harm is considered on balance to be acceptable in this urban location. Given the context of the site, these results are indicative of a relatively good retained level of daylight.
500. Overall, the daylight impact assessments of Cantium Retail Park in the proposed scenario show that 85% of the windows tested meet the BRE criteria for VSC and 99% of the rooms meet the NSL test.
501. Considering the daylight impacts overall, the harm that would be caused to some properties is on balance considered to be acceptable.

Sunlight

502. The BRE guide states that if a window can receive 25% of summer sunlight, including at least 5% of winter sunlight between the hours of 21 September and 21 March, then the room would be adequately sunlight.
503. 235 rooms within 12 residential properties have been assessed for sunlight.
504. The sunlight conditions in the baseline scenario show that 215 (91%) out of the 235 windows assessed within the surrounding sensitive receptors meet the BRE criteria for both total and winter annual probable sunlight hours (APSH). This level of compliance is considered very good.
505. The six properties highlighted grey within the table below would not experience noticeable alterations (below 20%) in sunlight levels and would experience a negligible effect with the completed proposed development in place. The remaining six properties are considered to experience noticeable alterations in sunlight levels and are discussed further.

Table: Summary of sunlight levels within surrounding sensitive receptors

Address	Total no. of rooms	No. of rooms that meet BRE criteria	Total APSH			Winter APSH		
			Below BRE Guidelines			Below BRE Guidelines		
			20-29.9% reduction	30-39.9% reduction	>40% reduction	20-29.9% reduction	30-39.9% reduction	>40% reduction
549 Old Kent Rd	7	4	0	0	1	0	0	3
547 Old Kent Road	5	4	0	0	0	0	0	1
545 Old Kent Road	5	4	0	0	0	0	0	1
553 Old Kent Rd	9	7	0	0	1	0	0	1
543B Old Kent Rd	5	4	0	0	0	0	0	1
541D Old Kent Road	5	5	0	0	0	0	0	0
551 Old Kent Rd	5	5	0	0	0	0	0	0
525-539 Old Kent Rd	41	27	4	9	1	0	0	0
Greystoke House	18	18	0	0	0	0	0	0
Northfield House	79	79	0	0	0	0	0	0
Cardiff House, Peckham Park Road	8	8	0	0	0	0	0	0
399 Rotherhith e New Road	45	45	0	0	0	0	0	0

549 Old Kent Road

506. A total of seven rooms were assessed for sunlight within this building.
507. In total, four of the seven rooms assessed would meet the BRE criteria for both winter and total APSH.
508. For winter PSH, three would experience an alteration in excess of 40% which is considered a major adverse effect.
509. The one affected room for total APSH would experience an alteration in excess of 40% which is considered a major adverse effect.
510. Overall and based on professional judgement, the effect to this property would be

major adverse and significant.

547 Old Kent Road, 545 Old Kent Road, 553 Old Kent Road and 543B Old Kent Road

- 511. A total of 24 rooms were assessed for sunlight within these four buildings.
- 512. In total, 19 of the 24 rooms assessed would meet the BRE criteria for both winter and total APSH.
- 513. For winter PSH, four would experience an alteration in excess of 40% which is considered a major adverse effect.
- 514. The one affected room for total APSH would experience an alteration in excess of 40% which is considered a major adverse effect.
- 515. Overall and based on professional judgment, due to the majority of rooms meeting the BRE criteria for total and winter PSH, the effect to these properties would be minor adverse and not significant.

525-539 Old Kent Road

- 516. A total of 41 rooms were assessed for sunlight within this building.
- 517. In total, 27 of the 41 rooms assessed would meet the BRE criteria for both winter and total APSH.
- 518. For winter PSH, all the rooms assessed would meet the BRE criteria and are therefore considered to experience a negligible effect.
- 519. For total APSH, four rooms would experience an alteration between 20-29.9% which is considered a minor adverse effect and nine would experience an alteration between 30-39.9% which is considered a moderate adverse effect. The remaining room would experience an alteration in excess of 40% which is considered a major adverse effect.
- 520. Overall and based on professional judgment, due to all rooms meeting the BRE criteria for Winter PSH, the effect to this property would be minor adverse and not significant.

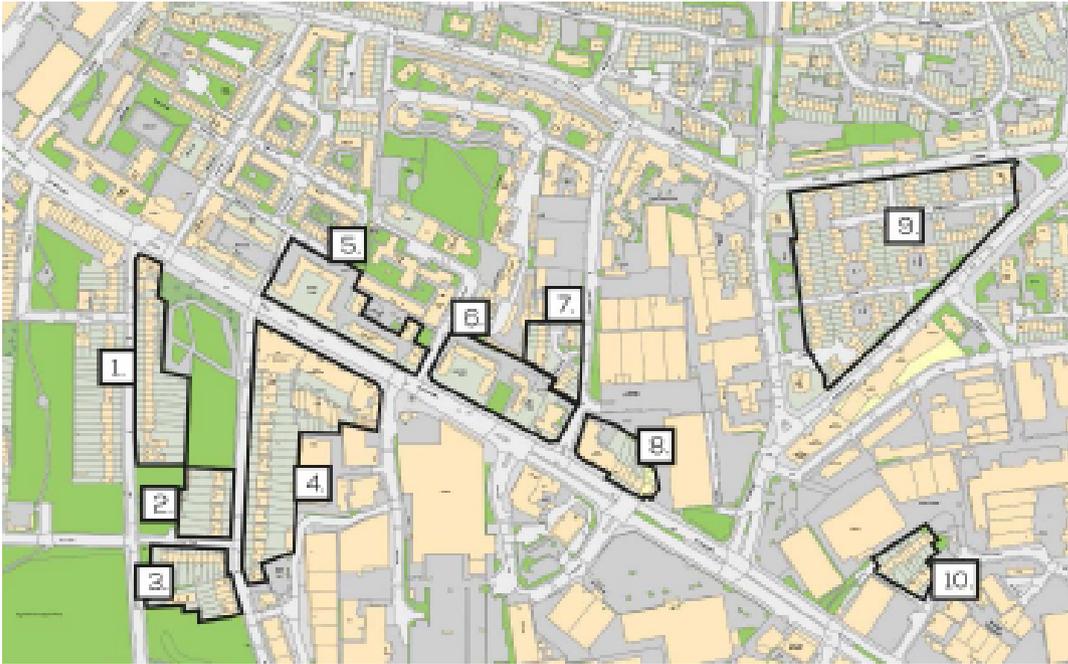
Conclusion on sunlight

- 521. As with daylight, there are a number of windows which would not meet the BRE guidelines for summer and winter sunlight. However, the extent of non compliance is considered minor overall, and is to be considered on balance to be acceptable.

Overshadowing

- 522. The transient overshadowing and sun hours on ground assessments for the proposed development are presented within the ES and the results are discussed in detail in the following commentary.
- 523. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least 50% of the area should receive at least two hours of sunlight on 21st March.

Image: Location of nearby amenity areas



524. The list of amenity areas assessed and contained in the image above are as follows.

- Area 1 – on Trafalgar Avenue;
- Area 2 – between Glengall Road and Glengall Terrace;
- Area 3 - between Glengall Road and Glengall Terrace;
- Area 4 – on Glengall Road;
- Area 5 – Mawbey House;
- Area 6 – George Elliston House and Eric Walkins House;
- Area 7 – on Ainsdale Drive;
- Area 8 – 525-535 Old Kent Road and 541–551 Old Kent Road;
- Area 9 – all private gardens between Rotherhithe New Road and St James’s Road;
- Area 10 – on Canal Grove

Park between Glengall Road and Glengall Terrace

525. Small areas of additional shadow would reach the park 08.00GMT for approximately 30minutes. However, the park would experience sunlight on all the area until 17:00GMT and therefore would meet the BRE criteria for 2 or more hours of sunlight on 21st March.

Mawbey House Old Kent Road/Communal Space

526. The amenity areas associated with Mawbey House would not be affected by the proposed development on 21st March.

George Ellison House and Eric Walkins House/Communal Space

527. A small section of the communal area associated with Walkins House is cast under shadow by the proposed development between 10:00GMT and 11:00GMT. However,

it is important to note that this communal space would still far exceed the BRE criteria of 2 or more hours of sunlight on 21st March as the area is sunlit until sunset.

525-539 Old Kent Rd and 541-551 Old Kent Road

528. Between 10:00GMT to 11:00GMT there would be the potential for a very small area of additional shadow to be cast by the proposed development on the communal space to the rear of Howson Court. From 11:00GMT there would be no additional shadow until 12:00GMT, at which point additional shadow would be cast for approximately one hour. From 13:00GMT onwards, no additional shadow would be cast by the proposed development. Therefore, this space would comfortably provide more than 2 hours of sunlight on 21st March.

Private Gardens

529. The transient overshadowing assessments submitted as part of the ES identifies that the surrounding private gardens at the following addresses would meet the BRE criteria of 2 or more hours of sunlight on 50% of their area on March 21st.

- Trafalgar Avenue;
- between Glengall Road and Glengall Terrace;
- Glengall Road;
- Ainsdale Drive;
- All private gardens between Rotherhithe New Road and St James's Road;
- Canal Grove

530. The impact of the proposed development on these private gardens is therefore considered to be negligible.

Solar glare

531. The potential impacts of solar glare resulting from the sun reflecting off the proposed buildings have been considered within the ES with a total of 55 viewpoints considered from nearby roads where the development would be visible. The main consideration was to assess whether the proposed buildings would affect a drivers line of sight. The ES notes that there would be some instances of solar glare, particularly at the front of the site on the Old Kent Road but given the spaces in between the buildings on that frontage, the absence of continuous glazed elements on the development, and as the reflections would only occur for small periods of time when moving along Old Kent Road, the impacts are found to be considered acceptable and no additional mitigation is required.

Cumulative Impacts on daylight, sunlight and overshadowing

532. Given the location of the application site and the surrounding land uses, the majority of impact on daylight and sunlight is generated on land to the north and east of the application site.
533. The proposal is not predicted to have any unacceptable impacts on residential receptors to the south of the application site (e.g. Latona Road and Denstone, Greystoke and Milbrook Houses).
534. Given the emerging proposals for development to the south of the application site

(contained within the emerging allocation for OKR 10 and the live planning application for land at Malt Street), the impacts of the proposed development is not likely to be greater than the cumulative impacts of those schemes. The corollary of this is that the impact of the schemes to the south of the application site would not exceed the impacts of the proposal on the land to the north and east.

535. Delivering high density developments presents challenges in many areas, including daylight and sunlight. This is acknowledged in the BRE guidance. The guide is aimed at helping designers minimise potential impacts. In addition, daylight and sunlight need to be considered and balanced alongside other matters, such as the need for housing, the buildings' thermal and energy performance, access to public transport and provision of other amenities.
536. Daylight and sunlight matters have been factored into the design of the proposed development at an early stage. The location of tall buildings and the site layout reflect the objective to maximise the level of internal daylight and minimise external impacts. This ensures that the development meets the policy target for high quality residential accommodation and does not preclude the same on adjoining sites. Overall, the cumulative impacts on daylight, sunlight and overshadowing are on balance considered to be acceptable.

Transport issues

537. 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.
538. The submitted Transport Assessment is considered to provide a comprehensive appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.

Access and trip generation

539. The site records a Public Transport Access Level (PTAL) of 3 to 4 indicating moderate public transport accessibility on a scale of 1a-6b, where 1a is the lowest and 6b is the highest. There are numerous bus stops within 300 metres of the site that serve bus routes to and from central London and with connections to stations including Bakerloo and Northern Line and national rail services at Elephant and Castle and Northern, Jubilee and national rail services at London Bridge.
540. Principal vehicular access to the site would be achieved via a new T-junction off Olmar Street. This junction will provide access to a proposed new private street that would extend roughly east-west through the site providing access to a proposed basement car park as well as providing residential servicing access to the three developments block. The existing access will be returned to a footway.

541. Once occupied, the vehicular trip generation from the site is estimated to be as shown in the table below.

Table: Trip generation

Mode	Am Peak 0800 - 0900		PM Peak 17:00 – 18:00		Daily 0600 to 2100	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Vehicular	16	28	28	28	417	421

542. The trip generation figures represent a ‘worst case’ scenario include all servicing deliveries to the residential and commercial units. Overall, because of the large reduction in the levels of car parking at the site from 260 to 55 (reduction in 205 spaces), there would be a significant reduction in vehicular trips upon completion of the development. Therefore, the development would result in a positive impact on the local highway network.

Servicing

543. Residential deliveries would be accommodated at street level through means of five proposed loading bays (2no. delivery and 1no. taxi drop off between C2 and destination space, 1no. large scale delivery next to A.I and 1no. delivery next to B.III). The loading bays would provide a maximum of 18 servicing movements in any one hour.

544. Deliveries to the retail, office and destination space would take place within the proposed service yard to be accessed off Olmar Street. The service yard is large enough to accommodate an articulated lorry and a refuse vehicle at the same time, with adequate manoeuvring space.

545. An additional service yard would be provided beneath Block B, which would accommodate refuse and recycling collections from all the residential accommodation in Blocks B and C. Refuse collection from Block A will be carried out from a proposed loading bay situated off Olmar Street.

546. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 5000 sqm of non-residential floor-space.

547. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:

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

The bond with the council against its own baseline of daily trips for the servicing and delivery of the development.

548. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £113,500 based on the 1113 residential units and 10,819sqm of non residential floorspace. The applicant has agreed to the contribution which can be collected via the legal agreement.

Waste management

549. An outline Site Waste Management Plan (SWMP) has been submitted which outlines the strategy for refuse collection. The refuse lorry would use the same one-way access via Olmar Street as the deliveries and servicing vehicles. Residents in kerbside and maisonette houses in Blocks A and B would take bins located in front gardens to collection points at the kerbside of respective blocks on collection day. Residents in core sections of Blocks A and B and all residents of Block C would deposit waste into respective communal bins. Commercial waste would be stored in dedicated waste stores within each building in convenient locations ready for collection via a dedicated service lift.

Buses

550. The site has convenient access to accessible public bus services. Main bus routes connecting to New Cross, Elephant and Castle, London Bridge, Waterloo and Kings Cross run along Old Kent Road with stops immediately in front of the site.
551. There is only limited capacity on the transport network to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area in advance of the opening of the planned BLE which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. Ahead of this, some development could be accommodated through improvements to the existing primarily bus-based public transport and to active travel.
552. The council has been actively working with Transport for London to agree contributions toward bus improvements over a five-year period, commensurate with the impact of the development. It is anticipated that these discussions will be concluded very soon, which would determine the level of financial contribution towards buses that the development would need to provide. Once the discussions have been concluded and the level of contribution agreed, the legal agreement would secure the collection of the payment which would then be passed onto Transport for London.

Healthy streets

553. Users of this proposed development would benefit from a "Healthy Streets" scheme currently under development for Old Kent Road, specifically in relation to proposed improvements to the pedestrian environment, pedestrian crossings, cycling facilities and bus priority.

Walking and the public realm

554. Overall a large proportion of the site is given over to public realm. It provides a significant section of the proposed Surrey Canal linear park and joins up with other proposed routes (specifically one within the “Malt Street” development, and the extension of Livesey Place which would be adjacent to a potential new park on the Frensham Street depot site) to make a coherent and very permeable site. An “urban square” is proposed between the two blocks fronting Old Kent Road and in front of the proposed “destination space” allowing opportunity for some coordinated events, which is welcomed.
555. A Pedestrian Environment Review System (PERS) audit was undertaken to consider the pedestrian environment. This information demonstrated the proposal would improve the pedestrian experience as routes audited were considered to be pedestrian friendly and benefited from good pedestrian infrastructure.
556. It is recommended that the area of footway /public realm on the Old Kent Road frontage is secured as public highway in the Section 106 agreement to ensure it is capable of delivery of safe and comfortable pedestrian movement and operation of the bus stop and to take account of the Healthy Streets scheme. The applicant has offered to prepare a plan showing the area which they consider appropriate for adoption, which can be used to facilitate discussions with TfL.
557. Amendments were made to the proposed vehicle turning and drop-off area for Block C to address concerns expressed at an earlier stage about the character of this space. These have had a positive impact.

The applicant has agreed to accept the condition proposed by TfL that requires details pertaining to the height of proposed kerb upstands, location of dropped kerbs and materiality of crossing points to be submitted and agreed before installation.

558. The applicant notes the importance of the design of the streetscape around Block C1 (48 storey tower) and its relationship with the Old Kent Road and adjoining public spaces, and accordingly has made further alterations to the design and layout to maximise the pedestrian areas on Old Kent Road as noted in paragraph 556 above. The revision includes the rotation of structural columns and the setting back of glazed frontages at ground floor level. The final set of amendments now increases the width of the footway from 5900mm to 6100mm and reduced the column obstruction from 1200mm to 1000mm. The effect is to increase the usable width from 4700mm to 5100mm.
559. A condition has been included on the draft decision notice that requires the details of shopfront and columns, building access points, lighting and limitations on street furniture to be submitted.

Car parking

560. The development is largely car free but would provide a total of 55 parking spaces made up of the following:
- 34 disabled parking spaces available for residents of wheelchair accessible dwellings;

- 18 for the retail element of the development including 4 blue badge spaces;
- 3 Blue Badge spaces will be provided at street level within the site for use by visitors to residents.

561. The majority of the spaces (52 of the 55 spaces) would be located within the proposed basement. The proposed retail and residential car parking within the basement will be separated.
562. The GLA has raised concerns about the level of retail car parking (18 spaces) in the development and have stated that it should be removed. Officers consider that the level of retail car parking proposed is reasonable, taking into account bulky goods that would be for sale and click and collect services where items can be collected from the store which encourages footfall and activity to the retail units, and thereby maintains the commercial viability of the established operators. As part of the review of the requested car park management plan, these spaces could be readily be monitored, surveyed and converted into more wheelchair parking spaces if they are not occupied. It is therefore considered that this aspect of the scheme would be policy compliant.
563. 4 car club bays are proposed and these would be managed by ZipCar. 3 years membership would be provided for residents, which can be secured by the legal agreement.
564. A condition would also ensure that no future residents or occupiers of the proposed development could obtain resident parking permits for any future CPZ.
565. It is also felt appropriate to attach a condition to the draft decision notice asking for the submission of marketing materials for sale and rental properties clearly identifying the development as car free and that all new residents should sign acknowledgement of the permit free status of their new home.

Bakerloo Line extension running tunnels

566. The current proposals for the BLE involve running tunnels directly below this site. The impact of the proposed scheme's foundations on these tunnels is currently being assessed by TfL. TfL have recommended that a condition be imposed to ensure TfL's approval of the foundation design, and a condition to this effect has been included on the draft decision notice.

Tree planting on Old Kent Road

567. An agreement under Section 278 of the Highways Act 1980 would be required with TfL in relation to the proposed works and tree planting on the footway. The process of negotiating the Section 278 agreement would give opportunity for detailed discussion about issues such as paving materials and the acceptability and potential species of street tree.

Cycling

568. The council is developing a cycle link from Ilderton Road to Rotherhithe New road to run parallel to the Old Kent Road and the proposed development would not prevent the cycleway from being delivered. This site can connect to Quietway 1 from Rotherhithe New Road.

569. A total of 2,035 cycle parking spaces would be provided across the scheme. This would be split across the uses as follows:

- Residential – 1,861 No. Long Stay, 29 No. Short Stay;
- B1 Office – 58 No. Long Stay, 9 No. Short Stay;
- Retail – 12 No. Long Stay, 20 No. Short Stay;
- 'Destination Space' – 24 No. Long Stay, 3 No. Short Stay; and
- Flexible Retail in Block C – 4 No. Long Stay, 15 No. Short Stay

570. The cycle parking would be provided through a mix of double stackers, Sheffield stands and oversized cycle stands with the provision for larger bicycles within Sheffield stands and the oversize cycle stands equating to some 26% of the overall long-stay provision. This far exceeds the 5% minimum requirement set out in the London Cycle Design Standards.

571. In response to the comments made from the GLA on the cycle spacing, the applicant has confirmed that all cycle parking meets the minimum standards set out in the London Cycling Design Standards (2m bay length x 1m centres). The proposed Josta stackers also accord with the recommended height of 2.6m which is required by this guidance.

572. The design and layout of the basement cycle storage has been undertaken with due regard to Chapter 8 of the London Cycling Design Standards. The main access to cycle parking facilities in the basement is via the ramp (rather than cyclists having to use a lift or stairs). If cyclists are uncomfortable using the vehicular ramp, there is the option to utilise segregated pedestrian routes which include stairs or lifts.

573. Cycle parking would be provided for each of the three blocks, with all of the long-stay cycle parking for Blocks B and C within the proposed basement. Separate cycle stores are proposed for Block A, with all short-stay cycle parking for the various uses accommodated at street level at various locations around the site within the proposed landscaping.

574. The proposal includes non residential cycle parking for 98 long stay and 47 short stay across the site.

575. External cycle parking is located in well-lit, overlooked areas close to destinations and at key nodes along the linear park cycle route. The parking is also well integrated into design of public realm to minimise clutter and located to prevent obstruction of circulation routes.

576. The cycle parking aspirations within the draft New London Plan are only just at Examination in public stage (opened on 15 January 2019). Accordingly, no material weight can be afforded to the emerging policy targets in respect of cycle parking. Notwithstanding the policy position, the cycle parking standards proposed within the draft new Local Plan would require the provision of an enlarged basement. This would not be a viable option and would have a significant impact on the realisation of the development and therefore the delivery of strategic policy targets in respect of the delivery of new homes and jobs.

577. The proposed development meets the adopted policies within the London Plan in respect of cycle parking and accords with the London Cycle Design Standards.

578. Officers are developing the possibility for the introduction of publicly accessible cycle hire to operate in the Old Kent Road area in the form of Brompton style lockers. The applicant will therefore be asked to consider offering space within their development for public access, and a condition to this effect has been included on the draft decision notice.
579. The scheme would include cycle routes within the development. There would be a pedestrian and cycle link along the northern edge of the linear park, and would connect to neighbouring schemes to help deliver the wider aspiration of an off road east-west connection. This link would be a 4m wide shared cycle and pedestrian route and would be of a sufficient width for multiple users to pass at once.
580. The street between Blocks A and B would be designed as a cycle priority route to continue the north-south connection from the neighbouring Malt Street scheme proposals.

Travel plans

581. A travel plan should be secured for the destination space, to ensure that staff and customer trips are sustainable. This can be requested by condition.

Conclusion on transport

582. Officers consider that the scheme should be supported as the scheme because it reduces car dependency, provides good quality pedestrian and cycle permeability. It has residential management to reduce the impact of servicing and delivery and allows for the emerging plans for the surrounding public highway to be facilitated, subject to the following obligations and conditions:

- delivery and service plan bond;
- submission of a travel plan for the destination use;
- detailed design of the new road and servicing layout;
- a bus contribution following the completion of negotiations with TfL;
- detailed design mitigation around the base of tower C;
- car club bays and membership;
- publicly accessible cycle hire, if feasible;
- detailed design of cycle parking;
- foundation design to ensure no conflict with the BLE tunnels;
- condition to ensure residents would not be eligible for parking permits in the controlled parking zone, or any future cpz;
- marketing details condition;
- a car park design and management plan;
- s.278 works with the council and TfL for highway works, tree planting and to secure the entire area of footway along Old Kent Road to be adopted as public highway, and
- a construction management plan.

Noise and vibration

583. A Noise and Vibration Assessment has been undertaken as part of the ES to determine the likely noise impacts from the proposed development. Taking into account the proposed mitigation measures incorporated into the developments

construction management plan, it is anticipated that some adverse demolition and construction impacts would arise at Rotherhithe New Road/St James Road, Old Kent Road and the Friary Estate assuming worst case construction work scenarios. In this regard, a demolition and construction management plan has been requested by condition which shall include that the constructors operate under the Code of Considerate Practice. Upon completion of the development, the ES recommends that noise from plant should not exceed 10 decibels below existing background noise levels. In terms of considering the quality of the new residential use, the site was found to be suitable for residential accommodation with measures such as an acoustic façade, glazing and ventilation systems included. It is also recommended that conditions be included to ensure that residential uses located above a commercial use are sufficiently protected from any adverse noise impacts.

Planning obligations (S.106 undertaking or agreement)

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

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

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

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171	Agreed
Affordable housing monitoring	£48,043.05	Agreed
Carbon Offset – Green Fund	£1,349,298	Agreed
Delivery and service bond	£113,500	Agreed
Public open space	£197,825	Agreed
Transport for London Buses	To be agreed with TfL	Awaiting outcome of TfL discussions
Transport for London cycle hire contribution	TfL request a significant contribution to be determined through discussion	Funded through CIL
Admin fee	2% for all Southwark cash contributions, totalling £34,396.74, plus flat fee of £2,000 for costs incurred transferring TfL buses contribution. Total £36,396.74	Agreed.
Total	£1,756,233.79	Agreed

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

- Affordable housing provisions, including provision for an early stage review;
- Marketing, allocation and fit out of the wheelchair units;
- Business retention and relocation strategy, including provision for B&Q to be offered the opportunity to take the destination space, before it is offered or marketed to any other occupier;
- Appointment of workspace co-ordinator;
- Affordable workspace – 10% of office floorspace, at £18-£24 per sqft to the end user (excluding service charge which would be capped);
- Independent retail for the units in Block C tower;
- Limited public access and full residents access to Tower C- details to be confirmed and agreed;
- Delivery of the park and establishment of a management company to set up, run and manage the park;
- The council's Frensham Street park – maintenance shared by all developers who own land in the linear park;
- Phasing plans;
- Public access to open space and park;
- Local economy – construction phase job/contributions
- Local economy – end use jobs/ contributions and employment;
- Highway works – s278 works;
- Transport for London – s278 works including highway works, tree planting and adoption of Old Kent Road frontage as public highway;
- Car club membership for 3 years;
- A car park design and management plan;
- Connection to a future district heating system;
- London Living Wage – best endeavors to being offered to all staff employed in the commercial units as well as workers during the construction period;
- Delivery and service management plan;
- Demolition and construction management plan;
- Public realm works plan; and
- Securing of Alan Camp and Brisac Gonzalez architects to deliver the detailed design of the scheme, and Fabrik to deliver the detailed landscape design.

587. In the event that a satisfactory legal agreement has not been entered into by 5 September 2019 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

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

Mayoral and Borough Community Infrastructure Levy (CIL)

588. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material “local financial consideration” in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark’s CIL will provide for infrastructure that supports growth in Southwark.
589. In this instance a Mayoral CIL payment of £5,685,890.62 and a Southwark CIL payment of £31,919,908.70 would be required. These are pre-social housing relief figures and accordingly would be reduced when the CIL Social Housing Relief claim is submitted after the grant of planning permission.

Sustainable development implications

Energy

590. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor’s energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 35% reduction against part L of the Building Regulations 2013. An Energy statement and Sustainability Assessment based on the Mayor’s hierarchy have been submitted.
591. The applicants have submitted an energy strategy and a sustainability assessment for the proposed development which seek to demonstrate compliance with the above policies.

Be lean (use less energy)

592. Energy demand reductions are to be realised throughout the scheme via the specification of an optimised building fabric and the inclusion of energy efficient building services systems.

Be clean (supply energy efficiently)

593. A CHP plant is proposed to co-generate electricity and heat in a single combustion process and thereby reduce energy consumption, associated CO2 emissions and energy costs. It is proposed that this plant would serve the residential, offices and destination space.
594. The energy centre within the development can be future proofed to allow connectivity to the South East London CHP (SELCHP) District Heating Network when it becomes available in the future. This would be secured through the Section 106 Agreement. Officers are currently developing a District Heat Network scheme with GLA and Veolia (the operators of SELCHP).

Be green (low or carbon zero energy)

595. Roof mounted PV arrays are proposed to provide a green source of electricity to be utilised on site in the commercial units and Air Source Heat Pumps (ASHP) are proposed to serve the town houses. Significantly sized PV arrays have been proposed for the development and their use has been maximised, taking into account the amount of roof space that would be required for cooling condenser plant and lift over runs.
596. It is considered that the scheme has maximised the potential of 'be lean', 'be clean' and 'be green' measures and does not have scope to reduce the carbon emissions any further. This is because of the high density nature of the scheme and the lack of available roof space to include more PV panels.
597. The 'be lean', 'be clean' and 'be green' measures would result in an overall reduction of 37.99% in carbon dioxide emissions when compared to a scheme compliant with the building regulations. For the residential element, a 38% carbon reduction would be achieved falling short of the zero carbon requirements as set out in policy 5.2 of the London Plan, amounting to a 749.61 tonne shortfall. For the commercial element, a 36% reduction in carbon emissions would be achieved meeting the 35% target against Part L of the Building Regulations.
598. Recognising that the residential aspect fall below the policy requirements in relation to carbon savings, a contribution towards the council's carbon offset fund would be required. Calculated on the basis of £1,800 per tonne, the residential component would generate a contribution of £1,349,298. The applicant has agreed to make the contribution of £1,349,298 to the carbon off set fund which would therefore make this aspect of the scheme fully policy compliant.

Overheating

599. The submitted Energy Statement has included an overheating analysis to demonstrate that the proposed new commercial and residential accommodation would mitigate overheating. It advises that factors such as an appropriate proportion of façade glazing, inclusion of balconies and use of solar control glass have been taken into account when considering the potential risk of overheating. Comfort cooling systems are also proposed to be installed. This aspect of the scheme is therefore considered acceptable.

BREEAM

600. Strategic policy 13 of the Core Strategy requires the commercial units to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken which demonstrates that an "excellent" standard can be achieved for the retail and office units. This meets the "excellent" standard required by the policy. It is recommended that a planning condition be attached to secure a post construction review to confirm that the "excellent" standard has been achieved in the completed development.

Ecology

601. An Ecological Impact Assessment was submitted with the application which has been reviewed by the council's ecology officer. A Phase 1 habitat survey and bat

emergence surveys were undertaken in March 2018. The purpose of the assessment was to identify any ecological mitigation or enhancement measures. No on site buildings or trees offered suitability to support roosting bats. Overall, the assessment found that the site is considered to be of negligible value for nature conservation.

602. The replacement scheme offers an opportunity to enhance the biodiversity value of the site and a series of ecological enhancements are proposed including Sustainable Drainage Systems, rain gardens, new tree planting, a mix of native and non native shrubs, bird and bat boxes and biodiverse roofs. It is recommended conditions be attached to secure the features, all of which have been included in the recommendation.
603. The Northfield House Community Wildlife Garden has been designated as a Site of Importance for Nature Conservation. The garden should continue to thrive with the development in place; there would be no overshadowing impacts since the proposed development is located to the north of the garden, rather than to its south.

Air Quality

604. The impacts of the scheme on air quality have been assessed as part of the ES. The site lies in an Air Quality Management Area. The impacts during the demolition and construction phases of the scheme have been addressed and were considered not to be significant when appropriate mitigation measures are adopted such as measures to control dust emissions, details of which can be requested by condition to form part of the demolition and construction management plan.
605. The proposed development has been designed to limit exposure to existing poor air quality. No residential apartments would be located at ground level facing onto Old Kent Road where impacts from road traffic would be at a maximum.

Lighting strategy

606. The lighting strategy would ensure a safe, accessible and welcoming public realm and allow use of the amenity spaces after dark. The lighting would be designed to prevent spread of light in an upward direction. Spill of light beyond the site boundary would be avoided preventing any impact on adjacent buildings. The lighting would be of an energy efficient design, and full details can be requested by condition.
607. Where possible, lighting would be integrated into the fabric of the buildings or into landscape elements such as furniture, water features etc. to minimise clutter. Certain features would be illuminated to enhance character of space. For example, the public square would include integrated lighting to paving and furniture to create a vibrant night time space.

Ground conditions and contamination

608. A Ground Contamination Risk Assessment has been submitted with the application which considers that there may be historic sources of ground contamination at the site. The report recommends that a site investigation is necessary to confirm potential contamination risks in relation to the proposed development. The investigation and remediation would be secured by an appropriately planning condition recommended by the council's environmental health officers. Subject to the imposition of this condition, this aspect of the scheme is found acceptable.

Water resources and flood risk

609. A Flood Risk Assessment (FRA) has been provided, which confirms that the site is within Flood Zone 3 and is protected by flood defences and as a result, has low risk of tidal or fluvial flooding and low risk of surface and ground water flooding. The Environment Agency has reviewed the FRA and considers the scheme to be acceptable, subject to the imposition of conditions. These conditions are included on the draft decision notice.
610. The council's flood and drainage team have also reviewed the submitted material and Drainage Strategy. They are pleased that the drainage strategy incorporates blue, green roofs as well as permeable paving and underground storage tanks. All of the surface water attenuation would take place on site and discharges would be limited to greenfield runoff rates (8.6l/s) which is considered very good. The flood team have requested that a full, detailed drainage strategy is requested by condition as their submitted strategy is in preliminary form.
611. The scheme includes provision for a large basement. A basement scoping report has been submitted and reviewed by the council's flood team who consider it adequate. A full basement impact assessment has however been requested by them prior to commencement of the development to ensure the basement is safe from a flood risk perspective and would not have a detrimental impact on the environment. A condition to this effect has been included on the draft decision notice.

Archaeology

612. The site lies within the Bermondsey Lake Archaeological Priority Zone. The submitted Archaeology report adequately scopes the archaeological interest and is supported by an archaeological desk based assessment.
613. Archaeology is a significant consideration with regard to the scheme, as evidenced by the results of an archaeological evaluation and excavation on the site by the Museum of London in 1990. In the early post-glacial period the site was on the fringes of a large lake, Bermondsey Lake, which occupied much of the area of what is now eastern Bermondsey, and would have attracted activity and settlement from the earliest times. In 1990, prior to the existing retail buildings being built, large scatters of in situ worked flint dating to the Mesolithic and Neolithic periods (*circa* 8,500 BC to 2,000 BC) were found in the west of the site, and there is potential for further in situ evidence to continue beneath the existing car park, possibly relatively undisturbed.
614. The application scheme includes a large basement and accordingly, all archaeological remains impacted by the scheme would require full archaeological excavation. Targeted evaluation trenches/pits in areas not previously subject to archaeological evaluation would confirm the nature, condition, extent and significance of remains that would be affected by the scheme. A preliminary investigation could also include the archaeological monitoring of any further geotechnical pits or boreholes for engineering purposes. The results would allow an informed decision to be made in respect of an appropriate mitigation strategy for any significant archaeological assets.
615. The submitted report shows that if any archaeological remains do survive on this site, it is likely that they will survive in localised pockets across the site. On balance, there is sufficient information to establish that the development is not likely to cause such

harm as to justify refusal of planning permission provided that robust pre-commencement conditions are applied to any consent in relation to archaeological evaluation, archaeological mitigation, foundation design and reporting of the site work.

Wind microclimate

- 616. The ES considers the potential impacts and associated likely effects of the proposed development on the local wind microclimate within and around the application site. In particular, it considers the potential effects of wind upon pedestrian comfort and summarises the findings of a wind tunnel testing exercise.
- 617. The wind tunnel tests were conducted with no planting or landscaping around to ensure the assessment is based upon a conservative (i.e. windier/ worst case scenario).
- 618. The assessment of the wind conditions at the application site requires a standard against which the measurements can be compared. The submitted assessment uses the Lawson Comfort Criteria, which have been established for over 30 years. The Criteria, which seeks to define the reaction of an average pedestrian to the wind, are described in the table below. If the measured wind conditions exceed the threshold wind speed for more than 5 % of the time, then they are unacceptable for the stated pedestrian activity and the expectation is that there may be complaints of nuisance or people will not use the area for its intended purpose.

Table: Lawson Comfort criteria

Comfort category	Threshold	Description
Uncomfortable	>10m/s	Winds of this magnitude are considered a nuisance for most activities, and wind mitigation is typically recommended.
Walking	8-10 m/s	Relatively high speeds that can be tolerated if the objective is to walk, run or cycle without lingering.
Strolling	6-8 m/s	Moderate breezes that would be appropriate for strolling along a city/town centre street, plaza or park.
Standing	4-6 m/s	Gentle breezes suitable for main building entrances, pickup/drop-off points and bus stops.
Sitting	0-4 m/s	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or comfortably sit for long periods.

- 619. The scheme has embedded wind mitigation measures which have been included in the submitted planning and landscape drawings which consist of new tree planting, new shrub planting and installation of screens/ balustrades where required.
- 620. The results of the wind tunnel testing found that, on the basis of the wind mitigation measures, there would be no significant environmental effects as a result of the proposed development based on the following:
 - All thoroughfare locations would achieve the desired strolling or calmer wind

- conditions during the windiest season;
- All entrance locations would achieve the desired standing or calmer wind conditions during the windiest season;
- All amenity spaces apart from one at ground level would achieve the desired sitting wind condition during the summer season;
- One ground floor location within the public square would have wind speeds that marginally exceed the upper threshold for sitting use – as mitigation, it is considered that the detailed design of the landscaping could be adjusted, which can be secured by condition;
- All podium areas would be appropriate for sitting;
- All balcony areas would be appropriate for either sitting during the summer season with the exception of four locations towards the top of the Block C tower. It is considered appropriate that further details of the detailed design of the balcony design could be secured by condition, to ensure adequate mitigation against the wind.

621. It is therefore found that based on the additional mitigation which can be secured by condition, the effects of the development on the local wind microclimate are acceptable.

622. The cumulative assessment found that the additional development and emerging massing provided an overall reduction in wind speeds in and around the application site. This is due to the change in massing when compared to the existing condition. So the impacts of the development, when combined with those of the cumulative, would continue to have an acceptable impact on the local wind microclimate.

Health impact assessment

623. The applicant has submitted a Health Impact Assessment as an ES appendix. The submitted assessment has been reviewed by the council's public Health team who consider it a very comprehensive document. The main health effects are anticipated to be on the existing local community and existing employees in the area who would be exposed to a phased programme of construction work for approximately six years. Good construction management would help minimise these impacts, and accordingly a construction management will be secured in line with the council's normal practice.

624. The proposals are expected to result in the need for the equivalent of between 1.35 and 1.53 additional full-time GPs. The draft OKR AAP sets plans for a new health hub, which would be funded from the council's CIL.

625. In addition, the applicant has stated that they would consider the potential to make the development a 'Smoke Free' area. Smoking could be restricted within the outdoor public realm through the use of appropriate signage. This would be welcomed.

Socio-economic impacts

626. The ES has presented an assessment of the potential impacts and associated likely socioeconomic effects of the proposed development arising from the demolition and construction works and on completion of the proposed development. In particular, the ES presents the results of the assessment of the potential impacts and likely effects related to employment levels created by the proposed development and the potential impacts and likely effects associated with the new residential and workforce population on-site, including any effects on local social and community infrastructure

and crime.

627. The assessment has considered the following potential impacts:

- Provision of new homes;
- Generation of a new resident population;
- Loss of existing commercial floorspace and creation of new commercial/leisure/community floorspace;
- Introduction of a new worker population; and
- Change in the site conditions with regard to surveillance, activity and lighting.

628. The following effects are anticipated:

- Temporary loss of operational commercial employment;
- Creation of temporary demolition and construction related training and employment opportunities;
- Introduction of a new residential population creating additional demand for community facilities and infrastructure (including primary and secondary schools, healthcare facilities and open space and play space);
- Creation of play space and open space on-site;
- Creation of longer-term operational employment opportunities; and
- Improvements in site safety reducing crime rates.

629. The demolition and construction stage of the proposed development is expected to generate the creation of direct and indirect construction employment, which is considered a temporary effect.

630. The build out period for the proposed development has been identified as commencing in Q1 2020 and ending in Q1 2026, totalling approximately six years, or 72 months. Based on a total construction period of approximately 72 months (dependent on the market requirements at the time of construction); the total average employment generated would be approximately 598 construction jobs over the duration of the demolition and construction phase.

631. The proposed development's construction phase is anticipated to last for 6 years. Due to the constrained site and the retail park nature of the existing uses it is not feasible to maintain operation of the uses on site during the construction period, but there are other facilities nearby such as the Pets and Home in Greenwich, an alternative pet shop in Camberwell. Argos is also located on the Old Kent Road in the Southernwood Retail Park.

632. As referred to above, Pets and Home and Halfords would be re provided in the completed development. B&Q could be reprovided and there are also alternative stores within a 4 mile radius of the application site (Greenwich, West Norwood and Sydenham).

633. The proposed development is expected to generate a range of potential significant direct and indirect social and economic impacts, with likely permanent effects.

634. The proposed development's forecast child yield would result in an increased demand for school places. The proposed development would create a demand for 94 primary aged places and 50 secondary aged places. The remaining 179 children would be comprised of 155 children of early years age (under 5 years old) and 24 children of

post-secondary age (16+ years old).

635. The draft OKR AAP sets plans for a new secondary school and two new primary schools, which would be funded from the council's CIL.
636. The proposed development's additional forecast population of 2,436 would result in the need for the equivalent of between 1.35 and 1.53 additional full-time GPs, the former figure reflecting a ratio of 1,800 patients to GP, the latter 1,600 patients to GP.
637. The draft OKR AAP includes proposals to expand the existing health facility on Verney Road, which would meet the anticipated demand from the development, and can be funded from the CIL payment.
638. The application site is currently operational as a retail park, and as previously stated, this space provides approximately 59 FTE jobs.
639. Based on the standard employment densities, this space would create an estimated 431 - 580 FTE jobs, when compared to the existing number of jobs on the site which is 59, representing an uplift of up to 521 jobs.
640. There could be a high risk of crime to be committed as there is a high level of crime in the local area and the application site is a conducive environment for crime outside of retail hours, when there is significantly less activity in the space.
641. In terms of crime prevention design measures, the following are proposed following consultation with the Designing Out Crime Officer (DOCO) at the Metropolitan Police:
- The ground floor layout has been designed to maximise opportunities for passive surveillance of the public realm spaces. Entrances will be well lit and overlooked, public areas will be uniformly well-lit.
 - The ground floor layout provides good visibility to access routes and spaces, and good accessibility to the spaces. Controlled access to relevant areas of the scheme has been addressed such as the residential units and the development will incorporate CCTV.
 - The commercial units are intended to provide both activation and passive surveillance, but also to act as a catalyst for wider improvements within the area, with a view to contributing towards a reduction in crime.

Fire safety

642. The applicant has submitted a fire safety strategy with the application based on the requirements of the relevant Building Control standard BS 9991:2015 for residential parts of the site and BS 9999:2017 for non residential areas. The key elements of the strategy would be:
- All flats would be provided with domestic sprinklers. The car park, loading bay and other on residential areas would also be provided with sprinklers;
 - All flats would be fitted with fire alarm systems including the communal areas, car parks, retail units, event space and offices;
 - Travel distances and smoke ventilation in common corridors would be in line with BS 9991;
 - The non residential areas would be provided with sufficient escape routes to ensure travel distances are within limits set out in BS 9999;

- The office building would be provided with refuges for persons of impaired mobility. Refuges in the retail units and event space are to be provided as part of the tenants fit out;
- The materials used to line the walls and ceilings would meet the fire performance standards in BS 9991 or BS 9990 respectively;
- The loadbearing elements of structure for each building would be constructed to a 60 or 120 minute of fire resistance, dependent on their respective height, as specified in BS 9991;
- Individual flats would be separated from each other and from other areas by fire resisting walls. Ancillary residential areas would be separated from each other in fire resisting construction in accordance with BS 9999;
- The external walls would only use materials which meet the strict combustibility criteria of the Building (Amendment) Regulations 2018;
- All towers, including the office building, would be firefighting shafts;
- The basement would be provided with mechanical smoke extraction.

643. As the development would incorporate all of the above measures, the applicants building control inspectors (International Fire Consultants) are confident that the development would provide for a high standard of safety for occupants of the building.

Aviation

644. The National Air Traffic Safeguarding Office (NATS) have reviewed the proposed development and from a technical safeguarding aspect and have stated that it does not conflict with their safeguarding criteria. Accordingly, they have no objections to the proposal.

Television and radio signals

645. A desktop-based study and baseline reception survey have been performed to assess the possible effects and impacts on the reception of television and radio broadcast services from the proposed development. The use of tower cranes and the proposed development could cause disruption to the reception of digital satellite television services to the north west of the site on the opposite side of Old Kent Road.

646. There is a number of satellite viewers located in this area. Should interference occur, initially, a simple and cost-effective mitigation solution would be to relocate the satellite dish to a new location where the view to the serving satellite is not obscured by the obstruction. Overall, whilst some minor adverse impacts are thought to exist for digital satellite television reception for a small number of properties to the immediate north-northwest of the site, simple mitigation solutions exist that ensure the quick and cost-effective restoration of reception for any affected viewer. It is recommended that a planning condition be included to requiring details of the specific impacts that would occur, and mitigation measures to remedy the impacts.

647. Arqiva (who own and manage the majority of the UK's broadcast and transmission infrastructure have identified an adverse impact to a radio link passing between BBC Broadcasting House and a transmission site at Wrotham, and have raised a holding objection. Upon more detailed impact assessments, Arqiva concluded that whilst an impact was considered likely, rerouting the link to avoid the proposed development was possible and are working towards that outcome. Once the link has been rerouted, there would no longer be any adverse impact to Arqiva's telecommunications network. Overall, it is considered that once Arqiva's microwave link has been rerouted to avoid

the obstruction created by the proposed development, the proposed development would have a neutral effect on local telecommunications systems and networks. It is considered that this matter is capable of being resolved between the Arqiva and the applicant directly.

Statement of Community Involvement

648. Consultation was carried out by the applicant prior to the submission of the planning application. The consultation was carried out with the local community and key stakeholders from the area and included the following forms of activity:
- Two public exhibitions at the Unwin and Friary Tenants Hall. The first on 22 & 26 March 2018 (attended by 60 residents) and the second on 3 & 5 September 2018 (attended by 35 residents).
 - Community Planning Event at the Unwin and Friary Tenants Hall (23 & 28 August 2018). This was a drop in workshop style event for the local community to discuss in detail key aspects of the scheme with the project team. It was attended by approximately 30 attendees.
 - Approximately 9,000 newsletters distributed to advertise the public consultation events.
 - OKR Forum. The applicant presented the proposals at the council's OKR Forum on 8 September 2018, attended by around 40 residents.
 - Newspaper adverts. Two adverts placed in the Southwark News to publicise the consultation events.
 - Stakeholder meetings. The applicant has offered local groups and elected representatives regular briefings. To date, five meetings have been held.
 - Residents' enquiries. A dedicated telephone number and email address were supplied and managed.
649. To summarise, a number of key themes have emerged as a result of feedback from stakeholders. There was a broad level of understanding that the Old Kent Road AAP has informed issues such as height, density and capacity. However despite this, there was some concern from residents about the prospects of overdevelopment in the area.
650. There were mixed views about the parking strategy for the scheme, with some consultees expressing concerns about the 'car-free' nature of the proposals on the grounds that this would lead to overspill onto neighbouring streets. However others believed that the approach would result in lower levels of congestion and improved air quality.
651. Some stakeholders were concerned about the loss of SIL in the area, and wanted to see industrial land accommodated within the scheme. However following discussions with the project team it was understood that the existing site does not contain any SIL, and that this would not be compatible with the Development Proposals being brought forward.
652. Attendees supported the proposed retail and employment spaces, and were enthusiastic about the potential of the destination space. The public spaces, in particular the urban square and linear park, were also popular features. Consultees generally expressed support for a scheme which would deliver benefits for local people, such as community facilities, alongside an affordable housing mix which would help to meet local needs.

Other matters

653. None.

Community impact statement / Equalities Assessment

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

- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
- b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
- c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

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

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

657. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. It is not considered that this proposal would give rise to any equalities issues in respect of persons sharing the relevant characteristics set out above.

Conclusion on planning issues

658. The major redevelopment of the site is supported and welcomed in principle. The principle of housing on the site is also accepted, and would be in line with policy aspirations to increase the number of new housing units in the area.

659. The reduction in retail floorspace is considered acceptable, when taking into account the overall uplift in other commercial floorspace which includes offices and a destination space use. In advance of the Old Kent Road being an adopted town centre, the quantum of town centre uses including retail, offices and destination space use fully accords with the sequential approach to development and therefore can be supported.

660. The proposed mix of uses, including the destination space use would add to the vibrancy of the area which is complemented by the substantial public realm improvements with the creation of new routes which would significantly improve permeability and connectivity in the area. The proposal would provide an extensive improvement of the streetscape together with new active frontages along the Old Kent Road which would improve the experience for pedestrians.
661. The scheme would deliver the following major regeneration benefits:
- 1,113 new homes to the borough's housing stock;
 - 35.48% affordable housing;
 - A total of 363 new affordable homes, of which 237 would be social rented;
 - 431 – 580 new full time equivalent employment positions, an uplift of up to 521 jobs;
 - The substantial contribution to the linear park and a new urban square fronting onto Old Kent Road;
 - The re-provision of the existing Pets at Home and Halfords stores;
 - An opportunity for B&Q to be re-provided should they decide to take up all, or part of the destination space;
 - Improved connectivity for cyclists and pedestrians;
 - Affordable office space;
 - Independent retail for the retail units in Block C;
 - Greenfield rates of run off;
 - Public access to the communal amenity on the 46th floor of Block C (the tallest tower).
662. The proposal would deliver a very high standard of accommodation, which would comply with the majority of the standards and principles of exemplary residential design, as set out in Southwark's residential design standards SPD. In particular, the scheme would include a majority of dual aspect units of 64% which is considered very good taking into account the high density of the scheme.
663. Whilst there would be some harm to the surrounding conservation areas, this should be weighed against the wider regeneration benefits of the scheme as set out above.
664. The impacts of the scheme in relation to daylight and sunlight, are on balance considered acceptable, and whilst there would be departures from the BRE guidelines, the daylight and sunlight levels are still considered adequate for a dense urban area.
665. Overall, the major regeneration benefits of the proposal are considered to outweigh the harm to the setting of the conservation areas and the daylight losses to some of the surrounding residential properties.
666. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, referral to the Secretary of State and the completion of a Section 106 Legal Agreement under the terms as set out above.

Community impact statement

Consultations

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

Consultation replies

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

Summary of consultation responses

Nine objections received on following grounds: (Note: one objection was submitted in 6 parts)

669. Objection: B&Q occupies the largest unit on the retail park and provides 105 local jobs (27 full time and 73 part time). It provides a valued service to the public and local businesses. The part of the retail market in which they operate is being undermined by the emphasis placed on delivering housing over meeting the retail sectors needs as part of an appropriate mix of uses. The applicant should seek to accommodate a large retail unit and demonstrate that the bulky goods retail sector is not being undermined within the Opportunity Area. Contrary to the NPPF, it is considered that the needs of existing businesses have not been accounted for and is not reflected within the final scheme. B&Q believe that whilst the proposal delivers significant benefits, it will cause significant adverse impacts on the access to bulky goods in an emerging major town centre. B&Q will be required to close of the planning application is approved in its current format and will increase travel times to purchase similar goods which is not sustainable. Request that the proposal be revised to make provision for a retail unit suitable for bulky goods retailers of a similar scale to the existing.
670. Officer response: It would not be possible to re-provide a retail warehouse of the scale of the existing B&Q (c4,000 sqm) with associated car parking and meet the wider policy objectives to deliver new homes, jobs and public spaces. However, in the light of the objection, the applicant has agreed to continue to explore the opportunity to accommodate B&Q within the new development scheme. There is no end user formally agreed for the 'destination space' proposed within Block B which could provide an opportunity if B&Q is willing to consider a smaller format store in this location. Further, the applicant has written to B&Q directly, welcoming a conversation to discuss their requirements and a potential store format that B&Q could operate from this part of the site.
671. Objection: Loss of jobs for staff currently employed on the site. Can there be a plan to keep these retail shops with a smaller size?
672. Officer response: Halfords and Pets at Home would be staying on the site following the redevelopment. An opportunity has been provided for B&Q to also stay on the site following the redevelopment.
673. Objection: Longer travel time if the existing shops are moved elsewhere.
674. Officer response: Halfords and Pets at Home would be staying on the site following the

redevelopment. An opportunity has been provided for B&Q to also stay on the site following the redevelopment.

675. Objection: The buildings are too tall, poor design totally inappropriate and of no benefit to the existing community.
676. Officer response: The building heights and design have been assessed and found to be acceptable and appropriate. The overall scheme offers a number of benefits to the existing community which include the delivery of affordable housing and the provision of new park and amenity spaces.
677. Objection: The types of housing these developments provide do not meet actual housing need, especially in the case of the housing proposed for the tall buildings.
678. Officer response: The scheme includes 35.48% affordable housing which would meet the housing needs of lower and middle income residents. The remaining 64.6% of private housing would contribute to the borough's overall housing need.
679. Objection: The target of 35% affordable housing is inadequate and not guaranteed. It needs to be scaled up to 50%. In addition, the "affordable" homes are anything but affordable.
680. Officer response: The provision of 35.48% affordable housing would make the scheme policy compliant. The level of provision has been viability tested and is the maximum that the development could support, taking into account the scheme viability which is considered in the main body of the report.
681. Objection: The increase in land values, rents and rates resulting from this proposal will destroy the local economy, such as it is, and prevent useful shops, workspaces or small industry from growing again to replace those being demolished. They will kill off local businesses and replace them with characterless global brands.
682. Officer response: At least two, if not all three of the existing occupiers would be re-provided on the site following the redevelopment. Clauses will be included in the legal agreement to secure independent retailers for the retail units in Block C as well as affordable office space.
683. Objection: It is important to maintain a balance in the local economy; not to create small pockets of wealth and activity in a sea of poverty. Old Kent Road needs investment for growth, not exploitation; for the benefit of the human beings who live and work here. Rents have to be kept low enough that small, local, accountable businesses can set up.
684. Officer response: Affordable office rents have been secured as part of the scheme, at £18-24 per sq ft. This should make the space attractive to small and local businesses. The legal agreement would secure that the space would be offered to existing Old Kent Road businesses first.
685. Objection: The need to build more homes should not be a justification for building tall at high densities. Densities need to be less than 700 habitable rooms per hectare (hrh) so people can live decent city lives rather than have to fit into regimes set by developers or housebuilders.
686. Officer response: The density of the scheme is 2,353 hrh. Whilst this is clearly above

the density range for this part of the borough, the standard of the accommodation has been found to be acceptable and exemplary in most instances.

687. Objection: Loss of daylight and overshadowing to Canal Grove.
688. Officer response: The transient overshadowing assessments submitted as part of the ES identifies that the private gardens at Canal Grove would meet the BRE criteria of 2 or more hours of sunlight on 50% of their area on March 21st. Please refer to the main body of the report for the detailed assessment. Properties on Canal Grove would remain compliant in respect of both VSC and NSL and accordingly would not experience any reduction in daylight.
689. Objection: There are too many piecemeal planning applications causing fragmented development and it is impossible to create cohesive neighbourhoods that would genuinely be pleasant to live in.
690. Officer response: There has been a considerable amount of consultation that has been undertaken as part of the draft OKR AAP. This includes developer workshops, meetings and consultations on the linear park. The applicant has been working collaboratively with adjoining landowners (including those promoting developments at Malt Street and the Civic Centre) to ensure the development of separate sites are cohesive.
691. Objection: The consultation process for the application is out of synch with the consultation process for the wider Old Kent Road Area Action Plan, throwing the honesty of the latter process into question. The Old Kent Road AAP is still under discussion. This development consultation and other similar ones underway are likely to change the reality on the ground before the OKR AAP process is finished, making for a fait accompli in the overall shape of the process.
692. Officer response: The London Plan identifies the Old Kent Road Opportunity Area as having significant potential for housing led growth. The AAP has been developed in response to this adopted plan. The scheme is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London plan and the direction of travel of the draft New Southwark Plan and the 2016 and 2017 draft AAPs and the 2018 draft New London Plan. In addition, the Council are proposing to make changes to the AAP in response to consultation as set out in the OKR consultation summary 2019. Further changes are likely to be made prior to the plans submission.
693. Objection: Southwark should notify residents that have shown an interest in the development of the AAP of when a major planning application is open for consultation.
694. Officer response: Adjoining residents were notified of the application. In this instance 461 letters were sent. In addition, members of the public can sign up to receive notifications of planning applications by signing up to the council's register on the website.
695. Objection: Canal Grove cottages were not consulted on the application.
696. Officer response: The Canal Grove cottages were sent consultation letters.
697. Objection: A car-free development on this scale is unrealistic. People still need vehicles to transport themselves where there is no suitable public transport; the same goes for

their visitors, their possessions, their shopping, their deliveries, their services, their rubbish and their contractors.

698. Officer response: Parking for wheelchair residents would be provided, including some retail parking for customer use.
699. Objection: Support regeneration including provision of housing at social and genuinely affordable rents but not if this housing or the garden spaces would be in shadow.
700. Officer response: The overshadowing analysis demonstrates that the new park and amenity spaces within the development would achieve very good levels of sunlight. Please refer to the main body of the report for the detailed assessment.
701. Objection: Impacts on wind microclimate.
702. Officer response: Based on the additional mitigation which can be secured by condition, the effects of the development on the local wind microclimate are considered acceptable.
703. Objection: Many of the green spaces would not actually be green but simply have the odd tree and likely to be privately owned spaces rather than public realm.
704. Officer response: The development includes the provision of a substantial part of the new linear park, the majority of which would be green. Block A and Block B courtyards would be for private use but the linear park and public square would have full public access. Some more limited access to 46th storey on Tower C would also be provided, details of which would be subject to the legal agreement.
705. Objection: The tired concept of “the canal route” being green misleads. Painting it green on a plan does not mean it would be anything but a narrow route between tall buildings and patches of grass. Not a space to want to linger, being overshadowed by buildings.
706. Officer response: At its narrowest point, the width of the linear park would be 28m. Final landscape plans would be requested by condition, to ensure that the landscaping proposals are green in character. The linear park would open onto Frensham Street park space.
707. Objection: There is not sufficient infrastructure to support such a dense development. There is already a shortage of school places and GP places and there is no more capacity on public transport; buses along the Old Kent Road are already overcrowded and often you have to let 2 or 3 go passed before you can get on one (especially the number 21).
708. Officer response: The applicant would be making a substantial contribution to the council’s Community Infrastructure Levy which could be used to support additional GP places. A proposal has been identified to provide additional places at the health centre on Verney Way. S106 contributions will be secured to enhance bus services.
709. Objection: Noise from construction.
710. Officer response: Demolition and construction management plans can be requested by condition and would ensure best practice procedures to mitigate construction noise as far as possible.

711. Objection: Impact on structural stability of nearby buildings.
712. Officer response: This issue has been considered in the submitted ES and it was found that the construction techniques proposed are considered unlikely to result in this type of impact. In addition, the applicant would engage with and inform the local community of the construction programme and provide a point of contact to pick up any residents concerns.
713. Objection: The development will push up housing rents in the neighbourhood.
714. Officer response: It is not felt that the proposed development would be responsible for pushing up nearby rents. The development would provide affordable rented accommodation.

Statutory and non statutory consultees

Greater London Authority:

715. That Southwark Council be advised the application does not comply with the London Plan and draft London Plan, for the reasons set out below. However, resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.
716. Principle of development: High density mixed use development within the Old Kent Road Opportunity Area could be supported in accordance with London Plan and draft London Plan policy provided the applicant and Council can demonstrate that the site is appropriate for the proposed town centre uses. There are also concerns with the quantum of office floorspace proposed and additional evidence is required from the applicant that the offices would not have a negative impact on the nearby Central Activities Zone.
717. Affordable housing: 35% by habitable room with a 67/33 split in favour of affordable rent. This offer meets the Fast Track Route, provided that, the rents and eligibility criteria accord with the London Plan and draft London Plan. The applicant must explore opportunities to increase the level of affordable housing by accessing grant funding. An early review mechanism must be secured.
718. Design: The principle of including tall buildings to optimise housing delivery on this opportunity area site could be supported. Details must be secured to ensure the delivery of a high quality development.
719. Heritage: The proposal would result in less than substantial harm to the nearby Listed Buildings or Conservation Areas which must be balanced with public benefits to be acceptable in accordance with the NPPF.
720. Transport: Further information is required on foundations, cycle parking and cycle infrastructure, car parking, servicing. Conditions and section 106 obligations are required.
721. Further information on Energy, Drainage and Urban Greening is required.

722. Transport for London: Comments made.

- There is only limited capacity on the transport network to accommodate the demand generated by additional homes and jobs in the Old Kent Road area in advance of the opening of the planned BLE which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. Ahead of this, some development could be accommodated through improvements to the existing primarily bus-based transport and to active travel. The GLA, TfL and the Council are in discussions regarding an area-wide approach to ensure that an appropriate framework is put in place which takes account of the BLE proposals;
- It would appear that there may be a conflict between running tunnels for the BLE and foundations for the proposed development. Therefore TfL requests that a condition is imposed requiring TfL's approval to foundation details, and that the applicant meets with the Bakerloo line extension project team to discuss further;
- It is understood that amendments have been made to the proposed vehicle turning and drop-off area for Block C to address concerns expressed at an earlier stage about the look and feel of this space. The height of the proposed kerb upstand and location of dropped kerbs and tactile paving at crossing points must be confirmed;
- Contribution towards the TfL's Healthy Streets scheme required, toward the cost of the section between and including its junctions with Peckham park Road and Commercial Way, in accordance with Policy T4 of the draft new London Plan;
- Due to site constraints and development issues the set back of the buildings on the Old Kent Road frontage is less than that needed to deliver the Council's aspirations and to meet draft new London Plan policies T2 (Healthy Streets), D7 (public Realm) and policy D8 (Tall Buildings) especially in the context of the emerging Healthy Streets scheme for pedestrian and cyclist and bus improvements on Old Kent Road to support development in the Opportunity Area. Whilst joint work has already been undertaken to mitigate these issues, the following pinch-points should continue to be addressed through detailed design and conditions;
- The s106 agreement should secure the adoption of the entire area of footway/public realm on the Old Kent Road frontage as public highway;
- An agreement under Section 278 of the Highways Act 1980 will be required with TfL in relation to the proposed works and tree planting on the footway. Three trees are proposed on the footway at the end of the Surrey Canal linear park, but there is no arboricultural report assessing their feasibility in relation to services in the footway which may prevent their installation. The process of negotiating the Section 278 agreement will give opportunity for detailed discussion about issues such as paving materials and the acceptability and potential species of street tree.
- The proposed cycle parking volumes do not meet the new draft London Plan requirements. Plans of the cycle parking spaces demonstrate that aisle width, stand spacing and general access to the cycle storage areas is poor and does not meet the London Cycling Design Standards and other best practice. The cycle storage areas indicated within the submitted plans are of insufficient size. Since additional space provision in the basement would require considerable re-design, it is recommended that this is addressed prior to determination rather than left to a condition.
- Accessibility to the stands relates to the ease of access both from the street and from the final destination of cyclists within the development. This should be via the minimum number of doors necessary to provide security, and the minimum

- number of corners that must be negotiated with a bike. These issues of accessibility of and to cycle parking stands raise issues of equality, since those with the protected characteristics of age and disability will be disproportionately affected. We believe that to approve these proposals would be a failure of the Council in respect of its public sector equalities duty.
- An audit of key cycling routes has been provided which conclude that there is a generally poor environment for cyclists on those routes. It is recommended that the Council secures funding to address deficiencies identified.
 - A significant contribution towards the cycle hire scheme should be sought, with the sum determined through current discussions between TfL and the Council.
 - The proposed retail car parking should therefore be removed or at the least its repurposing secured for when public transport is improved.
 - The parking for residents with disabilities equates to around 3% of the total number of residential units, which is not compliant with the draft new London Plan, as a Car parking Design & Management Plan has not been submitted which demonstrates how this could be increased to 10% in an acceptable way.
 - Electric/ultra low emission vehicle charging points should be fitted;
 - Contribution requested towards enhances bus services requested;
 - Revised travel plans to address deficiencies requested by condition;
 - A revised delivery and service plan should be requested by condition to address how deliveries would avoid peak hour goods vehicle movements;
 - A draft construction management plan should be requested by condition.

723. Historic England: The development would have major townscape impact in a wide range of views, many of which we consider to be harmful to the historic environment.

724. Cobourg Conservation Area: The wireline assessment demonstrates that the proposed towers would rise substantially above the existing tree and roofline resulting in a dominant intrusion on the skyline. This, in our opinion, would undermine the attractive and picturesque qualities of the conservation area in views from Burgess Park, and therefore cause harm to the character of the Conservation Area, and to the setting of the Grade II listed townhouses in this particular view.

725. Glengall Road Conservation Area: The rendered visuals provided reveal that the proposed towers would break the unobstructed roofline at the corner of Glengall Road and Glengall Terrace which would detract from the historic streetscape. We conclude that this impact would cause harm to both the character of the Conservation Area and the setting of these Grade II listed houses.

726. Caroline Gardens Conservation Area: View 14 assesses the impact of the development on Caroline Gardens from Asylum Road. This viewpoint, in our opinion, does not successfully capture the stately character and formal arrangement of Caroline Gardens which underpins its significance as a listed building complex and conservation area. The proposed development is also well screened by dense tree coverage in this view.

Officer Response: An additional view from Caroline Gardens was submitted.

727. Although it is very difficult to ascertain, View 14 suggests that the development would rise significantly above the height of the Ledbury Buildings in forecourt views, further disrupting the formal orthogonal plan and enclosed setting of Caroline Gardens. This is likely to cause harm to the character of the Conservation Area and the setting of the Grade II listed almshouse buildings.

728. Historic England is disappointed by the lack of detailed visual assessment of the development from Caroline Gardens. Providing sufficient information to understand the potential impacts of proposals on the significance of heritage assets is a policy requirement under Paragraph 189 of the National Planning Policy Framework (NPPF, July 2018), and your Council should therefore consider seeking additional visual information regarding this issue.
729. Distant Heritage Assets: View A2 reveals that the view from Nunhead Cemetery (Grade II* Registered park) towards the Grade I listed St Paul's Cathedral would not be affected by these proposals providing tree coverage remains as it is currently. However, the development would appear behind the Landmark Viewing Corridor towards St Paul's Cathedral in the Mayor of London's London View Management Framework (LVMF) View 3A.1 from Kenwood Gazebo. This is set out in View 2 of the submitted THVIA. We would draw your Council's attention to the advice set out in Paragraph 121 of the LVMF Supplementary Planning Guidance which states that development in the background of the Landmark Viewing Corridor should "contribute to a composition that enhances the setting of the Strategically Important Landmark".
730. Historic England considers that the proposed development would cause harm to the conservation areas and listed buildings as set out in this letter. Whilst we do not consider the level of harm to any individual designated heritage asset to be 'substantial' in NPPF terms, the cumulative impact of the development on the wide range of designations in the vicinity is of concern to Historic England. We also have concerns about the consideration of this application in the absence of an adopted strategy for the area which conflicts with our own tall buildings guidance as well as Paragraph 196 of the NPPF.
731. In determining this application, we would remind your Council of your duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special regard to the desirability of preserving listing buildings including their setting (Section 66) and preserving or enhancing the character of conservation areas (Section 72). In our view, this scheme fails to preserve both the setting of the listed buildings and the character of the conservation areas identified in this letter.

Design Review Panel: 12 March 2018

732. An earlier version of the scheme was presented to the Design Review Panel on 12 March 2018. The Panel investigated a number of aspects of the scheme including the location of the family homes and affordable housing, the back to back houses on Plot A, the ground floor perimeter of Buildings A and B, the sunpath of the courtyard on Block B, the nature of the "destination space", the urban rationale for the height and how the height would appear in local and wider views and the size of the public realm.
733. The Panel had already been briefed about the principles of the draft AAP and felt they could support a high quality, high density mixed use scheme in this location. They also supported the retention of the employment spaces and welcomed the idea of a "destination" space that may be taken on by a theatre. The Panel made a number of further comments which are summarised below.
734. Height: The Panel took account of the draft AAP and acknowledged that the site has been identified as a location to support a "tier 1" development of over 30 storeys, however they were not satisfied that the applicant had demonstrated that the three tall towers could be justified in this location. Given the sheer scale of the proposed development they expected to see a clear urban rationale to justify the proposed height

in this location which should include a sequence of views in both directions along the Old Kent Road and in the wider area and nearby conservation areas including Burgess park, Nunhead Cemetery, the linear park, Southwark park as well as further views afield such as from Crystal Palace – so that the proposal's impact from a wider panorama across London can be understood.

735. Identity: The scale of the development is of a London wide character which the Panel felt required further justification and consideration of its identity. They suggested that the applicant benchmark the proposed scale against other locations across London where buildings of a similar scale have been consented and implemented. They also felt that the proposed identity of the development should be considered further as the proposal should be described in the context of the Old Kent Road and with consideration to its location around the centre of the Old Kent Road.
736. Massing and architecture: The Panel were encouraged by the architectural direction of Tower C and felt this was the most developed aspect of the proposal. They felt the combination of its narrow footprint, angular form and simple architectural expression could result in an elegant tower – subject to further design development and consideration of height (as above). However the Panel raised significant concerns about the design of Towers B and A. Tower A was not ready for presentation at the time. When they considered Tower B the Panel felt the detailed design appeared fussy, needed further refinement and a stronger architectural concept. They encouraged the architects to review the Tower B design, to consider the expression of the base, middle and to design its landscaped setting in the context of the Old Kent Road.
737. The Panel raised significant concerns over the proposed massing of the low and mid rise buildings in plots A and B. These will deliver the bulk of the units across the site and would have a significant impact on the nature and quality of the design including sunlight and daylight levels on the public realm, the private courtyards and communal amenities as well as the residential units. The Panel challenged the designers to present their sunlight and daylight report and demonstrate how they have amended their design and adjusted the massing to address any concerns. They also suggested that perhaps the massing to the west and north sides of Plot B so that the southerly aspect of the courtyard benefitted from more sunlight and a better outlook.
738. Relationship with adjacent development: The Panel understood that many sites are being developed in parallel and were concerned that the designers had not shown how their proposal relates to Malt Street planning application (17/AP/2773) which adjoins the site on its southern boundary where it meets Plot A. They questioned the design of the extremely narrow courtyard, severely constrained block arrangement of single aspect back to back houses which appeared to be of a very poor quality design and an unpleasant home in which to live. They encouraged the applicant to show their scheme in the context of other nearby developments including the Malt Street scheme.
739. Urbaneness: The Panel felt the proposals lacked a clear sense of place. In particular, the Panel felt little thought had been put into how the homes would be used in daily life, including accessing their front doors and using local communal facilities. They asked the designers to demonstrate how each home is designed around its residents, how each home would be accessed across the development, their access to communal facilities, bin and bike storage and how they are planned internally.
740. Tower design: The Panel requested more information about the detail design of the towers especially the internal arrangement at the upper levels. Some of the flats were

arranged around balcony spaces for example which, at the upper most levels, are likely to be unusable if they remain open to the elements. In these cases the balconies are likely to become winter gardens which may result in a changing appearance on the façade and unusual habitable spaces with limited access to natural ventilation. The Panel asked the architects to be realistic about what is achievable and how the design would adapt with height to ensure that the flats, including their private amenity spaces would be used and enjoyed.

741. Conclusion: In conclusion, the Panel felt there were a number of aspects to this design that they supported and could endorse including the public realm, the routes and public spaces as well as the detailed design of Tower C (subject to height). However they questioned the urban rationale for the proposed height, the massing and arrangement of the low and mid rise buildings as well as the detailed design of the towers especially towers A and B. They asked the applicant to return to the DRP when they had addressed these points.

Design Review Panel: 12 February 2019

742. The application scheme was presented to the Design Review Panel for the second time on 12 February 2019. The formal report following the DRP has not been released at the time of writing but from the verbal response from the Chair at the end of the meeting, the main concerns were around:

1. Identity: Overall, the Panel raised a question over the identity and hierarchy of the development. The Panel did not feel there was a coherent narrative in terms of the hierarchy of place in the way it has defined the routes and spaces in and around the site. When they considered the civic identity of the proposal the Panel acknowledged that the scheme offered a rich mix of uses especially at the ground floor. However, they questioned how the hierarchy of these facilities had been reflected in the urban and architectural design. For example when the Panel looked at the destination space in Block B they highlighted that this is not distinguished in any particular way in the façade.

2. Residential quality: There was a clear focus on the 'back to back' houses and whether this was a suitable configuration given their single aspect design. Whilst they welcomed the provision of single family houses on this extremely dense site, the Panel felt these units were severely compromised. They highlighted the single aspect outlook onto a service lane, the inadequate separation distances in Block A, and inadequate access to communal facilities in Block B in their concerns about these houses.

3. The massing: The Panel generally accepted the proposed massing and arrangement as well as the layout of Blocks B and C. They were broadly satisfied with the arrangement and scale of the three towers. However, they questioned the simplistic explanation of a family of buildings that are in turn defined by their texture – rough to smooth. The Panel challenged the designers to develop the detailed design of the towers, to give them a recognisable sense of identity.

743. Thames Water: Thames Water would advise that with regard to the combined water network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Recommend condition in relation to water infrastructure.

744. Arquiva: Thank you for consulting us on this major application. You may recall that we flagged objections when we were consulted on the scoping application in relation to

the Environmental Impact Assessment.

745. You will be familiar with the guidance in the National Planning Policy Framework in paragraph 114 b), which advises local planning authorities to ensure they have considered the possibility of the construction of new buildings interfering with broadcast services. We are pleased that this is being considered and make the point that the link that will be broken is a vital one that connects BBC Broadcasting House to the national broadcast network. It is therefore of national importance that this link is either maintained or, as being actively explored, is replaced by alternative routing.
746. We have presented an initial solution with some indicative costs for progressing and potential costs for implementation and so we hope this issue will be resolved in agreement between all parties. There will however be a need to ensure the mitigation solution is implemented at an appropriate stage and the consequential costs paid by the development proposed. In due course we expect to discuss the associated mechanics associated with the developer, so that we can present to you an acceptable format that can be reflected in an agreement under Section 106.
747. Until this constructive dialogue has come to a logical conclusion, you will understand that we must protect our position and object to this application on the grounds that it will directly interfere with the terrestrial television broadcast network, a matter of national interest.
748. Metropolitan Police: This development is suitable to achieve Secured By Design accreditation. It is therefore appropriate to attach a 'Secured by Design' condition for the whole development.
749. Natural England: No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected sites.
750. Environment Agency: No objections subject to conditions.
751. National Air Traffic Safeguarding: The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) public Limited Company ("NERL") has no safeguarding objection to the proposal.
752. Public Health: No objection but make the following comments:
- Welcome that the detailed design of the landscape is secured by condition to ensure the ten TFL healthy street indicators are adhered to;
 - Comments from the council's environmental health team should be taken on board with respect to noise and any mitigation measures needed;
 - Unclear how contributions towards GP capacity would be secured;
 - A strength of the scheme is the cultural facility and co working facility but query how it would be secured;
 - Clarification on whether there would be disabled car parking provision for visitors to the cultural space;
 - It is positive the development does not seek consent for Class A5 uses and the applicant aspires to provide a healthy food environment and retail space which will accord with the Healthy Weight Environment. We request this is secured as an informative, planning condition or obligation in the s106;

- Welcome the commitment to secure a construction management plan by condition including taking into account construction impacts on vulnerable viistors in the vicinity including patients at nearby health centres such as the Trafalgar Surgery and the Avicenna Health Centre both 500m from the site;
- It is disappointing that the affordable housing target is just 32.6% when measured by unit.
- Request that the applicant explore the opportunity to brand their development “smoke free”.

Reconsultation

Statutory and non statutory consultees

Metropolitan Police: No further comments to make.

London Underground: No comment.

Human rights implications

753. 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.
754. This application has the legitimate aim of providing a redevelopment of the existing site to include new residential, retail, office and destination space uses in a development rising to 48 storeys. 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/2380-A Application file: 18/AP/3246 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5513 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Kiran Chauhan, Team Leader Old Kent Road	
Version	Final	
Dated	21 February 2019	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES /CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		25 February 2019

APPENDIX 1

Consultation undertaken

Site notice date: 06/11/2018

Press notice date: 08/11/2018

Case officer site visit date: n/a

Neighbour consultation letters sent: 06/11/2018

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

Arqvia, Winchester Court
Civil Aviation Authority
Council for British Archaeology
EDF Energy
Environment Agency
Greater London Authority
Health & Safety Executive
Historic England
London Borough of Lewisham
London Fire & Emergency Planning Authority
London Underground Limited
Metropolitan Police Service (Designing out Crime)
National Air Traffic Safeguarding Office
National Grid Transmission, National Grid House
National Planning Casework Unit
Natural England - London Region & South East Region
Network Rail (Planning)
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)
Unwin and Friary TRA, 1 Cardiff House
Vital OKR

Neighbour and local groups consulted:

Flat 35 Greystoke House Friary Estate SE15 6TQ
Flat 4 Greystoke House Friary Estate SE15 6TQ
Flat 5 Greystoke House Friary Estate SE15 6TQ
Flat 34 Greystoke House Friary Estate SE15 6TQ
Flat 31 Greystoke House Friary Estate SE15 6TQ
Flat 32 Greystoke House Friary Estate SE15 6TQ
Flat 33 Greystoke House Friary Estate SE15 6TQ
1a Peckham Park Road London SE15 6TR
3 Peckham Park Road London SE15 6TR
9 Peckham Park Road London SE15 6TR
Flat 9 Greystoke House Friary Estate SE15 6TQ
Flat 6 Greystoke House Friary Estate SE15 6TQ
Flat 7 Greystoke House Friary Estate SE15 6TQ
Flat 8 Greystoke House Friary Estate SE15 6TQ
Flat 22 Greystoke House Friary Estate SE15 6TQ
Flat 23 Greystoke House Friary Estate SE15 6TQ
Flat 24 Greystoke House Friary Estate SE15 6TQ
Flat 21 Greystoke House Friary Estate SE15 6TQ
Flat 19 Greystoke House Friary Estate SE15 6TQ
Flat 2 Greystoke House Friary Estate SE15 6TQ
Flat 20 Greystoke House Friary Estate SE15 6TQ
Flat 29 Greystoke House Friary Estate SE15 6TQ
Flat 3 Greystoke House Friary Estate SE15 6TQ
Flat 30 Greystoke House Friary Estate SE15 6TQ
Flat 28 Greystoke House Friary Estate SE15 6TQ
Flat 25 Greystoke House Friary Estate SE15 6TQ
Flat 26 Greystoke House Friary Estate SE15 6TQ
Flat 27 Greystoke House Friary Estate SE15 6TQ
2 Livesey Place London SE15 6SL
Flat 2 545 Old Kent Road SE1 5EW
Flat 2 549 Old Kent Road SE1 5EW
Flat B 612 Old Kent Road SE15 1JB
Flat 2 553 Old Kent Road SE1 5EW
Flat 1 553 Old Kent Road SE1 5EW
Flat 1 545 Old Kent Road SE1 5EW
Flat A 612 Old Kent Road SE15 1JB
Flat 4 545 Old Kent Road SE1 5EW
Flat 4 549 Old Kent Road SE1 5EW
Flat 5 553 Old Kent Road SE1 5EW
Flat 4 553 Old Kent Road SE1 5EW
Flat 3 553 Old Kent Road SE1 5EW
Flat 3 545 Old Kent Road SE1 5EW
Flat 3 549 Old Kent Road SE1 5EW
21a Peckham Park Road London SE15 6TR
628a Old Kent Road London SE15 1JB
Flat D 543 Old Kent Road SE1 5EW
632a Old Kent Road London SE15 1JB
24 Peckham Park Road London SE15 6TW
4 Verney Road London SE16 3DH
1-3 Verney Road London SE16 3DH
16a Peckham Park Road London SE15 6TW
First Floor Flat 18 Peckham Park Road SE15 6TW
First Floor Flat 11 Peckham Park Road SE15 6TR
First Floor Flat 541 Old Kent Road SE1 5EW

Flat E 543 Old Kent Road SE1 5EW
First Floor And Second Floor Flat 620 Old Kent Road SE15 1JB
First Floor And Second Floor Flat 624 Old Kent Road SE1 1JB
Flat 18 Greystoke House Friary Estate SE15 6TQ
Flat 70 Northfield House Friary Estate SE15 6TN
Flat 71 Northfield House Friary Estate SE15 6TN
Flat 72 Northfield House Friary Estate SE15 6TN
Flat 69 Northfield House Friary Estate SE15 6TN
Flat 66 Northfield House Friary Estate SE15 6TN
Flat 67 Northfield House Friary Estate SE15 6TN
Flat 68 Northfield House Friary Estate SE15 6TN
Flat 77 Northfield House Friary Estate SE15 6TN
Flat 78 Northfield House Friary Estate SE15 6TN
Flat 79 Northfield House Friary Estate SE15 6TN
Flat 76 Northfield House Friary Estate SE15 6TN
Flat 73 Northfield House Friary Estate SE15 6TN

Flat 32 Howson Court SE1 5XQ
Flat 29 Howson Court SE1 5XQ
Flat 30 Howson Court SE1 5XQ
Flat 31 Howson Court SE1 5XQ
Flat 40 Howson Court SE1 5XQ
Flat 41 Howson Court SE1 5XQ
Flat 42 Howson Court SE1 5XQ
Flat 39 Howson Court SE1 5XQ
Flat 36 Howson Court SE1 5XQ
Flat 37 Howson Court SE1 5XQ
Flat 38 Howson Court SE1 5XQ
Flat 19 Howson Court SE1 5XQ
Flat 20 Howson Court SE1 5XQ
Flat 21 Howson Court SE1 5XQ
Flat 18 Howson Court SE1 5XQ
Flat 15 Howson Court SE1 5XQ
Flat 16 Howson Court SE1 5XQ
Flat 17 Howson Court SE1 5XQ
Flat 26 Howson Court SE1 5XQ
Flat 27 Howson Court SE1 5XQ
Flat 28 Howson Court SE1 5XQ
Flat 25 Howson Court SE1 5XQ
Flat 22 Howson Court SE1 5XQ
Flat 23 Howson Court SE1 5XQ
Flat 24 Howson Court SE1 5XQ
Flat 43 Howson Court SE1 5XQ
612 Old Kent Road London SE15 1JB
620 Old Kent Road London SE15 1JB
630 Old Kent Road London SE15 1JB
9 Canal Grove London SE15 1LB
6 Canal Grove London SE15 1LB
7 Canal Grove London SE15 1LB
8 Canal Grove London SE15 1LB
13 Canal Grove London SE15 1LB
14 Canal Grove London SE15 1LB
15 Canal Grove London SE15 1LB
12 Canal Grove London SE15 1LB
593-613 Old Kent Road London SE15 1LA
10 Canal Grove London SE15 1LB
11 Canal Grove London SE15 1LB
45 Ossory Road London SE1 5AN
518 Old Kent Road London SE1 5BA
524 Old Kent Road London SE1 5BA
Luxford Bar 610 Old Kent Road SE15 1JB
9c Peckham Park Road London SE15 6TR
9d Peckham Park Road London SE15 6TR
Flat A 614 Old Kent Road SE15 1JB
3 Canal Grove London SE15 1LB
4 Canal Grove London SE15 1LB
5 Canal Grove London SE15 1LB
2 Canal Grove London SE15 1LB
Unit A Six Bridges Trading Estate SE1 5JT
506-510 Old Kent Road London SE1 5BA
The Everlasting Arms Ministry 600-608 Old Kent Road SE15 1JB
Flat 14 Howson Court SE1 5XQ
Flat 3 610 Old Kent Road SE15 1JB
Flat 4 610 Old Kent Road SE15 1JB
Flat 5 610 Old Kent Road SE15 1JB
Flat 2 610 Old Kent Road SE15 1JB
Flat B 616 Old Kent Road SE15 1JB
Flat C 616 Old Kent Road SE15 1JB
Flat 1 610 Old Kent Road SE15 1JB
Flat 10 610 Old Kent Road SE15 1JB
Flat 11 610 Old Kent Road SE15 1JB
Flat 12 610 Old Kent Road SE15 1JB
Flat 9 610 Old Kent Road SE15 1JB
Flat 6 610 Old Kent Road SE15 1JB
Flat 7 610 Old Kent Road SE15 1JB
Flat 8 610 Old Kent Road SE15 1JB
7a Peckham Park Road London SE15 6TR

Flat 74 Northfield House Friary Estate SE15 6TN
Flat 75 Northfield House Friary Estate SE15 6TN
Flat 56 Northfield House Friary Estate SE15 6TN
Flat 57 Northfield House Friary Estate SE15 6TN
Flat 58 Northfield House Friary Estate SE15 6TN
Flat 55 Northfield House Friary Estate SE15 6TN
Flat 103 Northfield House Friary Estate SE15 6TN
Flat 53 Northfield House Friary Estate SE15 6TN
Flat 54 Northfield House Friary Estate SE15 6TN
Flat 63 Northfield House Friary Estate SE15 6TN
Flat 64 Northfield House Friary Estate SE15 6TN
Flat 65 Northfield House Friary Estate SE15 6TN

Flat 62 Northfield House Friary Estate SE15 6TN
Flat 59 Northfield House Friary Estate SE15 6TN
Flat 60 Northfield House Friary Estate SE15 6TN
Flat 61 Northfield House Friary Estate SE15 6TN
Flat 80 Northfield House Friary Estate SE15 6TN
Flat 99 Northfield House Friary Estate SE15 6TN
Flat 1 Greystoke House Friary Estate SE15 6TQ
Flat 10 Greystoke House Friary Estate SE15 6TQ
Flat 98 Northfield House Friary Estate SE15 6TN
Flat 95 Northfield House Friary Estate SE15 6TN
Flat 96 Northfield House Friary Estate SE15 6TN
Flat 97 Northfield House Friary Estate SE15 6TN
Flat 15 Greystoke House Friary Estate SE15 6TQ
Flat 16 Greystoke House Friary Estate SE15 6TQ
Flat 17 Greystoke House Friary Estate SE15 6TQ
Flat 14 Greystoke House Friary Estate SE15 6TQ
Flat 11 Greystoke House Friary Estate SE15 6TQ
Flat 12 Greystoke House Friary Estate SE15 6TQ
Flat 13 Greystoke House Friary Estate SE15 6TQ
Flat 85 Northfield House Friary Estate SE15 6TN
Flat 86 Northfield House Friary Estate SE15 6TN
Flat 87 Northfield House Friary Estate SE15 6TN
Flat 84 Northfield House Friary Estate SE15 6TN
Flat 81 Northfield House Friary Estate SE15 6TN

Flat 82 Northfield House Friary Estate SE15 6TN
Flat 83 Northfield House Friary Estate SE15 6TN
Flat 92 Northfield House Friary Estate SE15 6TN
Flat 93 Northfield House Friary Estate SE15 6TN
Flat 94 Northfield House Friary Estate SE15 6TN
Flat 91 Northfield House Friary Estate SE15 6TN
Flat 88 Northfield House Friary Estate SE15 6TN
Flat 89 Northfield House Friary Estate SE15 6TN
Flat 90 Northfield House Friary Estate SE15 6TN
7 Ednam House Friary Estate Latona Road SE15 6SE
8 Ednam House Friary Estate Latona Road SE15 6SE
9 Ednam House Friary Estate Latona Road SE15 6SE
6 Ednam House Friary Estate Latona Road SE15 6SE
36 Ednam House Friary Estate Latona Road SE15 6SE
4 Ednam House Friary Estate Latona Road SE15 6SE
5 Ednam House Friary Estate Latona Road SE15 6SE
41 Ednam House Friary Estate Latona Road SE15 6SF
42 Ednam House Friary Estate Latona Road SE15 6SF
43 Ednam House Friary Estate Latona Road SE15 6SF
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39 Ednam House Friary Estate Latona Road SE15 6SF
27 Ednam House Friary Estate Latona Road SE15 6SE
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29 Ednam House Friary Estate Latona Road SE15 6SE
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23 Ednam House Friary Estate Latona Road SE15 6SE
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25 Ednam House Friary Estate Latona Road SE15 6SE
33 Ednam House Friary Estate Latona Road SE15 6SE
34 Ednam House Friary Estate Latona Road SE15 6SE
35 Ednam House Friary Estate Latona Road SE15 6SE
32 Ednam House Friary Estate Latona Road SE15 6SE
3 Ednam House Friary Estate Latona Road SE15 6SE

21b Peckham Park Road London SE15 6TR
9a Peckham Park Road London SE15 6TR
Flat 1 547 Old Kent Road SE1 5EW
John Penry House 1 Marlborough Grove SE1 5JS
Surrey Wharf 30 Olmar Street SE1 5AY
Council Depot Frensham Street SE15 6TH
Units B2 And B3 Six Bridges Trading Estate SE1 5JT
The Laundry Room Greystoke House Friary Estate SE15 6TQ
Flat A 616 Old Kent Road SE15 1JB
Unit B4 Six Bridges Trading Estate SE1 5JT
19a Peckham Park Road London SE15 6TR
Unwin And Friary Tenants And Residents Community Hall 33
Frensham Street SE15 6TH
Asda 478-500 Old Kent Road SE1 5AS
Hand Car Wash Asda SE1 5AG
Flat 4 Howson Court SE1 5XQ
Flat 5 Howson Court SE1 5XQ
Flat 6 Howson Court SE1 5XQ
Flat 3 Howson Court SE1 5XQ
Basement And Ground Floors 516 Old Kent Road SE1 5BA
Flat 1 Howson Court SE1 5XQ
Flat 2 Howson Court SE1 5XQ
Flat 11 Howson Court SE1 5XQ
Flat 12 Howson Court SE1 5XQ
Flat 13 Howson Court SE1 5XQ
Flat 10 Howson Court SE1 5XQ
Flat 7 Howson Court SE1 5XQ
Flat 8 Howson Court SE1 5XQ
Flat 9 Howson Court SE1 5XQ
Ground Floor Rear 16 Peckham Park Road SE15 6TW
1a Livesey Place London SE15 6SL
1b Livesey Place London SE15 6SL
Ground Floor Front 16 Peckham Park Road SE15 6TW
19b Peckham Park Road London SE15 6TR
Unit 2a Cantium Retail Park SE1 5BA
Unit 2b Cantium Retail Park SE1 5BA
Selco Builders Warehouse Six Bridges Trading Estate SE1
5JX
626b Old Kent Road London SE15 1JB
First Floor 516 Old Kent Road SE1 5BA
7c Peckham Park Road London SE15 6TR
1c Livesey Place London SE15 6SL
1d Livesey Place London SE15 6SL
7b Peckham Park Road London SE15 6TR
Flat 23 Northfield House Friary Estate SE15 6TL
Flat 24 Northfield House Friary Estate SE15 6TL
Flat 25 Northfield House Friary Estate SE15 6TL
Flat 22 Northfield House Friary Estate SE15 6TL
Flat 2 Northfield House Friary Estate SE15 6TL
Flat 20 Northfield House Friary Estate SE15 6TL
Flat 21 Northfield House Friary Estate SE15 6TL
Flat 3 Northfield House Friary Estate SE15 6TL
Flat 30 Northfield House Friary Estate SE15 6TL
Flat 31 Northfield House Friary Estate SE15 6TL
Flat 29 Northfield House Friary Estate SE15 6TL
Flat 26 Northfield House Friary Estate SE15 6TL
Flat 27 Northfield House Friary Estate SE15 6TL
Flat 28 Northfield House Friary Estate SE15 6TL
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Flat 11 Northfield House Friary Estate SE15 6TL
Flat 12 Northfield House Friary Estate SE15 6TL
Flat 1 Northfield House Friary Estate SE15 6TL
Flat 7 Millbrook House Friary Estate SE15 6TG
Flat 8 Millbrook House Friary Estate SE15 6TG
Flat 9 Millbrook House Friary Estate SE15 6TG
Flat 17 Northfield House Friary Estate SE15 6TL
Flat 18 Northfield House Friary Estate SE15 6TL
Flat 19 Northfield House Friary Estate SE15 6TL
Flat 16 Northfield House Friary Estate SE15 6TL
Flat 13 Northfield House Friary Estate SE15 6TL
Flat 14 Northfield House Friary Estate SE15 6TL
Flat 15 Northfield House Friary Estate SE15 6TL
Flat 32 Northfield House Friary Estate SE15 6TL

30 Ednam House Friary Estate Latona Road SE15 6SE
31 Ednam House Friary Estate Latona Road SE15 6SE
44 Ednam House Friary Estate Latona Road SE15 6SF
63 Ednam House Friary Estate Latona Road SE15 6SF
64 Ednam House Friary Estate Latona Road SE15 6SF
65 Ednam House Friary Estate Latona Road SE15 6SF
62 Ednam House Friary Estate Latona Road SE15 6SF
59 Ednam House Friary Estate Latona Road SE15 6SF
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52 Ednam House Friary Estate Latona Road SE15 6SF
53 Ednam House Friary Estate Latona Road SE15 6SF
54 Ednam House Friary Estate Latona Road SE15 6SF
22 Ednam House Friary Estate Latona Road SE15 6SE
Flat 4 John Penry House SE1 5JS
Flat 5 John Penry House SE1 5JS
Flat 6 John Penry House SE1 5JS
Flat 3 John Penry House SE1 5JS
Third Floor Flat 541 Old Kent Road SE1 5EW
Flat 1 John Penry House SE1 5JS
Flat 2 John Penry House SE1 5JS
Flat 11 John Penry House SE1 5JS
Flat 12 John Penry House SE1 5JS
Flat 13 John Penry House SE1 5JS
Flat 10 John Penry House SE1 5JS
Flat 7 John Penry House SE1 5JS
Flat 8 John Penry House SE1 5JS
Flat 9 John Penry House SE1 5JS
Flat 8 549 Old Kent Road SE1 5EW
Flat A 543 Old Kent Road SE1 5EW
Flat B 543 Old Kent Road SE1 5EW
Flat 7 549 Old Kent Road SE1 5EW
Flat 5 545 Old Kent Road SE1 5EW
Flat 5 549 Old Kent Road SE1 5EW
Flat 6 549 Old Kent Road SE1 5EW
Second Floor Flat 541 Old Kent Road SE1 5EW

9b Peckham Park Road London SE15 6TR
Second Floor Flat 11 Peckham Park Road SE15 6TR
Rear 7 Peckham Park Road SE15 6TR
Basement Flat 541 Old Kent Road SE1 5EW
Flat C 543 Old Kent Road SE1 5EW
Ground Floor Flat 541 Old Kent Road SE1 5EW
Flat 14 John Penry House SE1 5JS
13 Ednam House Friary Estate Latona Road SE15 6SE
14 Ednam House Friary Estate Latona Road SE15 6SE
15 Ednam House Friary Estate Latona Road SE15 6SE
12 Ednam House Friary Estate Latona Road SE15 6SE
1 Ednam House Friary Estate Latona Road SE15 6SE
10 Ednam House Friary Estate Latona Road SE15 6SE
11 Ednam House Friary Estate Latona Road SE15 6SE
2 Ednam House Friary Estate Latona Road SE15 6SE
20 Ednam House Friary Estate Latona Road SE15 6SE
21 Ednam House Friary Estate Latona Road SE15 6SE
19 Ednam House Friary Estate Latona Road SE15 6SE

Flat 5 Northfield House Friary Estate SE15 6TL
Flat 50 Northfield House Friary Estate SE15 6TL
Flat 51 Northfield House Friary Estate SE15 6TL
Flat 49 Northfield House Friary Estate SE15 6TL
Flat 46 Northfield House Friary Estate SE15 6TL
Flat 47 Northfield House Friary Estate SE15 6TL
Flat 48 Northfield House Friary Estate SE15 6TL
Flat 9 Northfield House Friary Estate SE15 6TL
Flat 100 Northfield House Friary Estate SE15 6TN
Flat 101 Northfield House Friary Estate SE15 6TN
Flat 8 Northfield House Friary Estate SE15 6TL
Flat 52 Northfield House Friary Estate SE15 6TL
Flat 6 Northfield House Friary Estate SE15 6TL
Flat 7 Northfield House Friary Estate SE15 6TL
Flat 37 Northfield House Friary Estate SE15 6TL
Flat 38 Northfield House Friary Estate SE15 6TL
Flat 39 Northfield House Friary Estate SE15 6TL
Flat 36 Northfield House Friary Estate SE15 6TL
Flat 33 Northfield House Friary Estate SE15 6TL
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Flat 35 Northfield House Friary Estate SE15 6TL
Flat 43 Northfield House Friary Estate SE15 6TL
Flat 44 Northfield House Friary Estate SE15 6TL
Flat 45 Northfield House Friary Estate SE15 6TL
Flat 42 Northfield House Friary Estate SE15 6TL
Flat 4 Northfield House Friary Estate SE15 6TL
Flat 40 Northfield House Friary Estate SE15 6TL
Flat 41 Northfield House Friary Estate SE15 6TL
Flat 6 Millbrook House Friary Estate SE15 6TG
15 Peckham Park Road London SE15 6TR
17 Peckham Park Road London SE15 6TR
21 Peckham Park Road London SE15 6TR
13 Peckham Park Road London SE15 6TR
589 Old Kent Road London SE15 1LA
1 Peckham Park Road London SE15 6TR
11 Peckham Park Road London SE15 6TR
14 Peckham Park Road London SE15 6TW
16 Peckham Park Road London SE15 6TW
18 Peckham Park Road London SE15 6TW
12 Peckham Park Road London SE15 6TW
5 Peckham Park Road London SE15 6TR
7 Peckham Park Road London SE15 6TR
10 Peckham Park Road London SE15 6TW
614 Old Kent Road London SE15 1JB
616 Old Kent Road London SE15 1JB
622 Old Kent Road London SE15 1JB
596-598 Old Kent Road London SE15 1JB
16 Canal Grove London SE15 1LB
17 Canal Grove London SE15 1LB
1 Canal Grove London SE15 1LB
591 Old Kent Road London SE15 1LA
634 Old Kent Road London SE15 1JB
626 Old Kent Road London SE15 1JB
First Floor And Second Floor Flat 634 Old Kent Road SE15 1JB
624 Old Kent Road London SE15 1JB
628 Old Kent Road London SE15 1JB
632 Old Kent Road London SE15 1JB
20 Peckham Park Road London SE15 6TW
Flat 24 Millbrook House Friary Estate SE15 6TG
Flat 25 Millbrook House Friary Estate SE15 6TG
Flat 26 Millbrook House Friary Estate SE15 6TG
Flat 23 Millbrook House Friary Estate SE15 6TG
Flat 20 Millbrook House Friary Estate SE15 6TG
Flat 21 Millbrook House Friary Estate SE15 6TG
Flat 22 Millbrook House Friary Estate SE15 6TG
Flat 30 Millbrook House Friary Estate SE15 6TG
Flat 4 Millbrook House Friary Estate SE15 6TG
Flat 5 Millbrook House Friary Estate SE15 6TG
Flat 3 Millbrook House Friary Estate SE15 6TG
Flat 27 Millbrook House Friary Estate SE15 6TG
Flat 28 Millbrook House Friary Estate SE15 6TG
Flat 29 Millbrook House Friary Estate SE15 6TG

16 Ednam House Friary Estate Latona Road SE15 6SE
17 Ednam House Friary Estate Latona Road SE15 6SE
18 Ednam House Friary Estate Latona Road SE15 6SE
13-14 Frensham Street London SE15 6TH
14 Frensham Street London SE15 6TH
90 Haymerle Road London SE15 6SB
Flat 18 John Penry House SE1 5JS
Flat 15 John Penry House SE1 5JS
Flat 16 John Penry House SE1 5JS
Flat 17 John Penry House SE1 5JS
Ground Floor 8 Peckham Park Road SE15 6TW
Ground Floor 10 Peckham Park Road SE15 6TW
High Way Depot Peckham Park Road SE15 6TR
Third Floor Flat Surrey Wharf SE1 5AU
Hygrade Meats Ltd Latona Road SE15 6RX
Western Wharf Livesey Place SE15 6SL
25-29 Lovegrove Street London SE1 5ER
Flat 102 Northfield House Friary Estate SE15 6TN
Flat 33 Howson Court SE1 5XQ
Flat 34 Howson Court SE1 5XQ
Flat 35 Howson Court SE1 5XQ

Flat 11 Millbrook House Friary Estate SE15 6TG
Flat 12 Millbrook House Friary Estate SE15 6TG
Flat 13 Millbrook House Friary Estate SE15 6TG
Flat 10 Millbrook House Friary Estate SE15 6TG
22 Peckham Park Road London SE15 6TW
8 Peckham Park Road London SE15 6TW
Flat 1 Millbrook House Friary Estate SE15 6TG
Flat 18 Millbrook House Friary Estate SE15 6TG
Flat 19 Millbrook House Friary Estate SE15 6TG
Flat 2 Millbrook House Friary Estate SE15 6TG
Flat 17 Millbrook House Friary Estate SE15 6TG
Flat 14 Millbrook House Friary Estate SE15 6TG
Flat 15 Millbrook House Friary Estate SE15 6TG
Flat 16 Millbrook House Friary Estate SE15 6TG
25 Queens Road Wallington SM6 0AG
36a Bird In Bush Road Peckham SE15 6RW
549 Old Kent Road London SE1 5EW
Norfolk House 7 Norfolk Street M2 1DW
Norfolk House 7 Norfolk Street M2 1DW
62 Reverdy Road London SE1 5QD
57 Pages Walk London SE1 4HD

Re-consultation: 11/02/2019

