

Item No. 6.1	Classification: Open	Date: 19 March 2019	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 18/AP/3144 for: Full Planning Application Address: Buildings 10 And 11, William Booth Memorial Training College, Champion Park, London, SE5 8BQ Proposal: Demolition of two existing buildings (Use Class C2) and erection of a part four, five and six storey multi-purpose building(maximum height of 23m), including basement, for offices (Use Class B1a) (6,747.3sqm GEA) and cafe (Use Class A3) (230.9sqm GEA), together with landscaping, boundary treatment, access and other associated works.		
Ward(s) or groups affected:	Champion Hill		
From:	Director of Planning		
Application Start Date 09/10/2018		Application Expiry Date 08/01/2019	
Earliest Decision Date 14/12/2018			

RECOMMENDATION

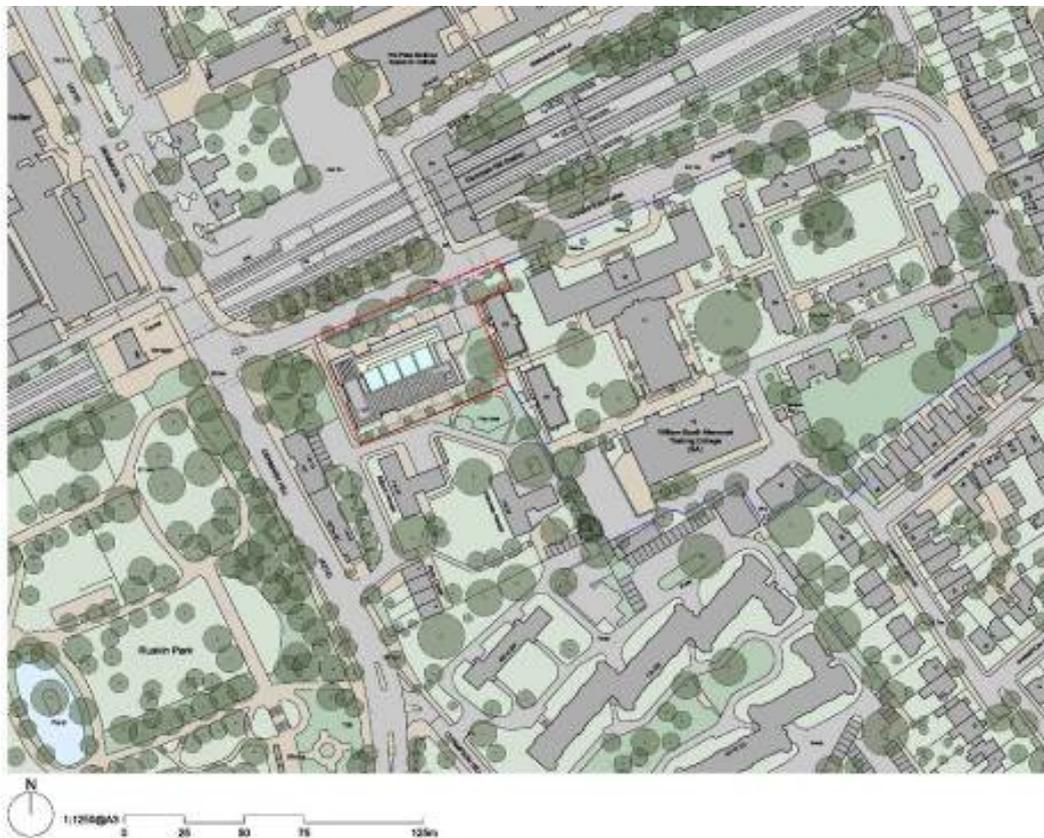
1. a) That planning permission be granted, subject to conditions and the applicant entering into a satisfactory legal agreement, and;
- b) That in the event that the legal agreement is not entered into by 19 June 2019 the Director of Planning be authorised to refuse planning permission if appropriate for the reasons set out in paragraph 120 of this report.

BACKGROUND INFORMATION

Site location and description

2. The application site forms part of the Salvation Army's main training facility, known as William Booth College, and is located on Champion Park. The section of the site on which the development has been proposed is on the western side of the college, close to the junction with Denmark Hill. The site has an area of .036ha and contains two four storey buildings, known as Buildings 10 and 11, which contain living accommodation used in conjunction with the main training centre, and therefore designated as Class C2 use. Buildings 10 and 11 are the newest buildings on the Salvation Army site, having been built in 1986. Both buildings were recently used to house refugees awaiting permanent settlement, under a temporary permission granted in 2017, but this use has now ceased.
3. Whilst the main site frontage is on Champion Park, the rest of the site is bound by a landscaped area fronting Denmark Hill to the west; Allport House, Hannen House and a small community play area to the south; and William Booth College Buildings 8 and 9 to the east. The site slopes steeply upwards as it extends southwards towards Allport House, and this rear part of the site contains a number of established trees.

4. The surrounding area comprises a mix of building heights and uses as well as a mix of modern and heritage buildings. Diagonally opposite the site on Denmark Hill is the part nine part ten storey Golden Jubilee wing of Kings College hospital, which now supports an air ambulance helicopter landing pad on its roof. Maudsley Hospital to the north contains buildings ranging from two to seven storeys.
5. The buildings immediately to the south of the site are predominantly residential and vary between five to six storeys in height. Buildings 8 and 9 on William Booth College, which are located directly east, are four storeys in height with the higher tower being further to the east.
6. Champion Park and Denmark Hill are both Classified A roads which have several bus routes along both of them. This, together with the site being located directly opposite the Denmark Hill station, gives the site a high Public Transport Accessibility Level (PTAL) of 5 indicating a 'very good' level of accessibility.
7. The majority of the site is not located within a conservation area and there are no listed buildings or structures within the application site. However, there is a very small section, in the north eastern corner of the application site, which does fall within the Camberwell Grove Conservation Area which extends along the eastern side of the site. In addition to this there are a number of listed buildings within the broader area, they are as follows:
 - To the east, the William Booth Memorial Training College (main building) as well as the statues of Mrs Booth and General Booth in the forecourt of the training college - both are Grade II listed.
 - To the North West, 111 Denmark Hill - Grade II listed.
 - To the north, Denmark Hill Station - Grade II listed.
 - To the south east, 27 and 28 Champion Grove - Grade II listed.



Details of proposal

Background to the proposal

8. The Salvation Army, who is the applicant for this application, is a Protestant Christian church and a international charitable organisation, which provides activities to address poverty and disaster relief and humanitarian aid to developing countries. The organisation reports a worldwide membership which is spread across 131 countries.
9. The William Booth College was constructed and formally opened on 8 July 1929. The Salvation Army chose the site in 1921 because they were looking for a prominent location on which to build a 'University of Humanity' as a memorial to their founder General William Booth. The external facades of the college were designed by Sir Giles Scott, a prominent British architect who was noted for his blending of gothic tradition with modernism to design popular landmark buildings across Britain.
10. The college provides distance and on-site learning programs for their cadets (officers-in-training), officers, lay employees and volunteers throughout the UK, Ireland and abroad. In addition to the training and administrative facilities provided on site, the college also provides temporary accommodation where the majority of the cadets stay during the duration of the course.
11. The Salvation Army's office headquarters are currently located at 101 Newington Causeway, in Elephant and Castle. They have expressed their views that their offices in Newington Causeway are no longer fit for purposed and they would essentially like to 'return home' to the William Booth College site.

Details of Proposal.

12. Planning consent is sought to redevelop the western section of the William Booth College which consists of two buildings (Buildings and 10 and 11). The existing buildings would be demolished to create a new part four, five and six storey headquarters office for The Salvation Army's UK and Republic of Ireland operations.
13. The proposed development would comprise of 6,747.3sqm of office floor space (Use Class B1 (a)). In addition to this there would be a small cafe (Use Class A3) on the lower ground floor (which is effectively street level to Champion Park). The new building as it fronts onto Champion Park, would be four commercial storeys high with a slightly set back fifth storey before stepping up to a sixth storey at the rear, as the gradient starts to rise to the south.



14. In terms of materials the building would be constructed of similar red/brown brick to that used on the existing buildings on the William Booth Campus. The presence of the red brick on all four elevations would be interspersed with stone cladding and full height windows. The Champion Park and rear elevations also includes stone fins The sixth floor would be constructed in stone cladding with large window openings.



15. Apart from the one disabled car parking space that would be reserved for blue badge holders, the proposed development would not provide any additional on site car parking spaces. Whilst the proposal would result in a loss of 15 of the existing 16 car parking spaces. The development would provide 171 cycling parking spaces.
16. The application site has 25 categorised trees. Out of the 25 trees on site, nine category B and three category C trees have been identified for removal in order to

facilitate this development. The majority of the trees that would be removed are located to the rear of the site. The applicant has proposed that the loss can be mitigated through the planting of semi-mature stock during the landscaping phase. In addition to the proposed works to the existing trees on site there would also be extensive hard and soft landscaping done throughout, with the majority of it being done on the Champion Park frontage.

Planning history

- | | |
|-----|---|
| 17. | <p>17/AP/1519 Application type: Certificate of Lawfulness - proposed (CLP) Use or Development (CLOPUD) to confirm the lawful use of four dwellings within building no. 10 to accommodate refugee families for a temporary period of up to five years (within the existing C2 use class)
Decision date 25/05/2017 Decision: Granted (GRA)</p> |
| | <p>17/AP/3919 Application type: Tree Preservation Order - works related (TPO)
T1 - 1 x Horse Chestnut with visible signs of Honey Fungus and basal decay to carefully dismantle to as close to ground level as possible. Clear all arisings leaving site clean and tidy. Outside Building 10.
T2- 1 x Lime tree to cut back from building to give a clearance of approximately 3 meters. Outside Building 11.
T3 -1 x Lime tree overhanging bus stop on main road to crown lift over bus stop to approximately 4 meters.T4 - 2nd Lime tree to crown lift over bus stop to approximately 4 meters and to cut back from building to give a clearance of approximately 2-3 meters.
Decision date 13/11/2017 Decision: TPO consent granted (TPOG)</p> |
| | <p>18/EQ/0069 Application type: Pre-Application Enquiry (ENQ)
The demolition of two existing buildings and the development of a multi-purpose building of approximately 5,000sqm, comprising primarily office space for The Salvation Army HQ. The HQ building will also contain additional uses such as a café open to the community, a prayer room, and band practice space.

Decision date 27/04/2018 Decision: Pre-application enquiry closed (EQC)</p> |

Planning history of adjoining sites

- | | |
|-----|---|
| 18. | <p>13/OB/0028 Application type: Formal Observation
Erection of a helipad on top of existing 10 storey Ruskin Wing building in South-East corner of hospital site, including the supporting structure, associated office space, access ramp, new lift core and first floor bridge link. Helipad used for emergency medical services only.
Decision date 17.01.2014</p> |
| | <p>07/AP1620 Application type:
Demolition of non-original late 19th century first floor link, demolition of some internal walls and 3/4 height partitions and formation of new internal staircase, lavatories and kitchenette
Decision date: 09.10.2007</p> |

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Equality implications
- Environmental impact assessment
- Design, including building heights
- Impact on heritage assets
- Trees and landscaping
- Impact of proposed development on amenity of adjoining occupiers and surrounding areas
- Noise and vibration
- Transport
- Air quality
- Flood risk
- Sustainable development implications
- Archaeology
- Planning obligations (S.106 undertaking or agreement)
- Mayoral and Borough community infrastructure levy (CIL)
- Statement of community involvement
- Other matters.

Planning policy

National Planning Policy Framework (the Framework) 2019

20. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 215 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

Chapter 2 Achieving sustainable development

Chapter 6 Building a strong, competitive economy

Chapter 7 Ensuring the vitality of town centres

Chapter 8 Promoting healthy and safe communities

Chapter 9 Promoting sustainable transport

Chapter 11 Making effective use of land

Chapter 12 Achieving well-designed places

Chapter 14 Meeting the challenge of climate change, flooding and coastal change

Chapter 15 Conserving and enhancing the natural environment

Chapter 16 Conserving and enhancing the historic environment

National Planning Practice Guidance

The London Plan 2016

21. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:

Policy 3.1 - Ensuring Equal Life Chances For All

Policy 4.1 – Developing London's Economy

Policy 4.2 - Offices

Policy 4.12 - Improving Opportunities for All

Policy 5.1 - Climate Change Mitigation

Policy 5.2 - Minimising Carbon Dioxide Emissions

Policy 5.3 - Sustainable Design and Construction

Policy 5.5 - Decentralised Energy Networks

Policy 5.6 - Decentralised Energy in Development Proposals

Policy 5.7 - Renewable energy
 Policy 5.8 - Innovative energy technologies
 Policy 5.9 - Overheating and Cooling
 Policy 5.10 - Urban Greening
 Policy 5.11 - Green roofs and development site environs
 Policy 5.12 - Flood risk management
 Policy 5.13 - Sustainable drainage
 Policy 5.14 - Water Quality and Wastewater Infrastructure
 Policy 5.15 - Water Use and Supplies
 Policy 5.21 - Contaminated land
 Policy 6.9 - Cycling
 Policy 6.10 - Walking
 Policy 6.13 - Parking
 Policy 7.1 - Building London's Neighbourhoods and Communities
 Policy 7.2 - An inclusive environment
 Policy 7.3 - Designing out crime
 Policy 7.4 - Local character
 Policy 7.5 - Public Realm
 Policy 7.6 - Architecture
 Policy 7.8 - Heritage assets and archaeology
 Policy 7.14 - Improving Air Quality
 Policy 7.15 – Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
 Policy 7.19 - Biodiversity and Access to Nature
 Policy 7.21 - Trees and woodlands
 Policy 8.2 - Planning obligations
 Policy 8.3 - Community infrastructure levy

Core Strategy 2011

22. 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 10 – Jobs and businesses
 Strategic Policy 11 – Open spaces and wildlife
 Strategic Policy 12 – Design and conservation
 Strategic Policy 13 – High environmental standards

Southwark Plan 2007 (July) - saved policies

23. 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
 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
- 3.16 - Conservation areas
- 3.18 - Setting of listed buildings, conservation areas and world heritage sites
- 3.19 - Archaeology
- 3.28 - Biodiversity
- 5.2 - Transport impacts
- 5.3 - Walking and cycling
- 5.6 - Car parking
- 5.7 - Parking standards for disabled people and the mobility impaired

Section 106 Planning Obligations/CIL SPD (2015)
 Sustainable Transport SPD (2010)
 Sustainable design and construction SPD (2009)
 Sustainability assessments SPD (2009)
 Statement of Community Involvement (2008)
 Design and access statements SPD (2007)

Draft New Southwark Plan (NSP)

24. For the last five 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.

Draft New London Plan

25. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Minor suggested changes to the plan were published on 13 August 2018 and an Examination in Public (EIP) began on 15 January 2019. The EIP will continue until May 2019 and until the London Plan reaches formal adoption it can only be attributed limited weight.

Principle of Development

26. At the heart of the NPPF is the presumption in favour of sustainable development. Amongst the key themes in achieving sustainable development are ensuring that they contribute to the building of a strong, competitive economy, promoting sustainable transport, delivering good design and make effective use of land.
27. The Salvation Army, who are the freeholder and occupier of the application site and the wider William Booth College site, wish to relocate their existing Territorial Headquarters (THQ) from Newington Causeway to their Denmark Hill site. The William Booth College was originally purpose-built to include both the training campus

and the THQ functions but the headquarter office functions then relocated to Newington Causeway. However, the Salvation Army has expressed their concerns that the existing THQ building is no longer fit for purpose and as a result they wish to redevelop a section of the application site to accommodate the returning of their headquarters

Land use assessment

28. The proposed development would result in the loss of the Class C2 use (residential institution including training centre) on the application site. The proposed development would introduce Class B1 (a) (offices) with Class A3 use (restaurants and café) on at ground floor.

Loss of Class C2 – (residential institution, including training centre)

29. Buildings 10 and 11 have provided temporary residential accommodation for the members of the Salvation Army. This use has been ancillary to the main function of the wider site as it has predominantly been used to accommodate cadets during their training at the college. As the need for providing accommodation to members of the Salvation Army began to reduce the army applied for a certificate of lawfulness in 2017 (17/AP/1519), to obtain temporary permission to use 4 of the units in building 10 to accommodate refugee families. The certificate was awarded, with the decision that the use to accommodate the families for a period of five years would be lawful.
30. The 2017 temporary permission for the residential use would lapse in 2022, however, the Salvation Army has confirmed with the council that the families no longer need to be accommodated at the college. Therefore, the lawful class C2 use remains the lawful use for the site. The C2 use is not protected under development plan policies and therefore the loss of C2 is considered acceptable.

Class B1(a) - Office

31. The NPPF expects significant weight to be given to supporting economic growth and for local business needs to be taken into account. Policies should be applied flexibly enough to accommodate needs not anticipated in the plan, and for specific locational requirements to be recognised. The Core Strategy sets out a target for growth in business floorspace, and although it anticipates that most of this will be focused in the Central Area and town centres, it does not preclude office growth in other appropriate locations. The site is not located within a town centre and the NPPF identifies office use as town centre use. Paragraph 86 of the NPPF 2019 requires that Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. It is preferable for main town centre uses to be located in town centres, before being considered in edge of centre locations.
32. The application site is not within Camberwell town centre, and is roughly 650 metre from the town centre boundary. It is, however, well located for public transport, which is one of the NPPF requirements for out of centre development, and in determining this application it is reasonable to give weight to the specific circumstances of the Salvation Army application. The William Booth centre has been established for over 90 years, and has in the past included their administrative offices. Bringing the Headquarters offices to Champion Park would allow the Salvation Army to consolidate their operations here, and create operational efficiencies which benefit the wider organisation. It would also release their Elephant and Castle site for development.
33. The area contains a mix of uses alongside the training college, most notably the two large teaching hospitals at Kings College and Maudesley. The office use would

support this mixed use character as well as reinforcing the economy of the nearby Camberwell town centre.

34. The redevelopment of the site would allow for a more efficient use of the land which is no longer required to house trainees and essentially enable greater synergy between the headquarter office functions and the William Booth College. As such, it can be supported in land use terms.

Class A3 – (restaurants and cafe)

35. The proposal would also provide a small café (Class A3 use) on the Champion Park frontage at ground floor level. This small unit would not draw any significant level of trade from the Camberwell town centre, would activate the street frontage, and would provide an additional local service not just for those working on the site but also for the wider public including those at the hospitals.

Conclusion on land use

36. Chapter 6 of the National Planning Policy Framework (NPPF), emphasises that planning decisions should 'help create the conditions in which businesses can invest, expand and adapt' (para. 80). The Salvation Army have identified existing facilities under their ownership that are no longer being used effectively. This has presented an opportunity for them to adapt and relocate, to better utilising their existing facilities in a location well-served by public transport. The proposed development is therefore supported in land use terms.

Community impact statement / Equalities Assessment

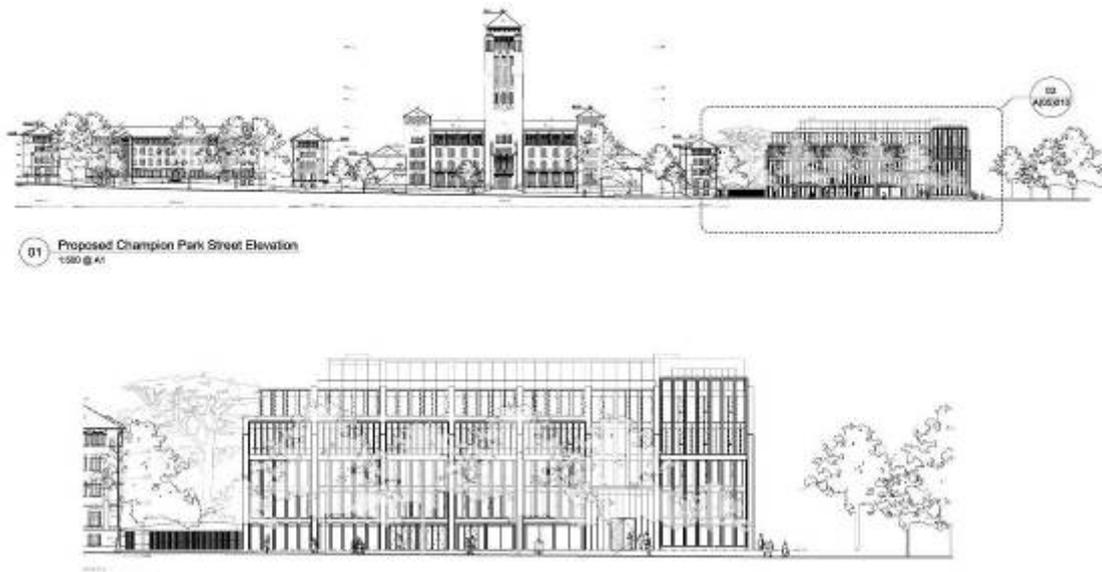
37. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:
 - a) The need to eliminate discrimination, harassment, 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.
38. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
39. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

40. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
41. The Salvation Army provide a range of charitable services to vulnerable groups including the homeless, those in poverty, elderly people and children. Many of these activities directly benefit people with protected characteristics.
42. In 2017 the Salvation Army were given temporary permission, for a period of up to 5 years, the use buildings 10 and 11 as short term housing for asylum seekers awaiting permanent homes. The flats were no longer needed for the Salvation Army member families, The Salvation Army have confirmed that all refugee/asylum seekers that were housed in buildings 10 and 11, in the lead up to submission of this application, have been re-housed within the Borough. The Salvation Army has assured the council that all appropriate measures had been put in place in the lead up to and post the relocation process.
43. Therefore, officers are satisfied that the proposed development would not negatively impact on those with protected characteristics and that the council has followed its legal duties under s.149 of the Equality Act 2010.

Design issues

44. The NPPF emphasises the importance of good design and states in Paragraph 56 that *“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making better places for people.”*
45. Chapter 7 of the London Plan deals with design related matters. In particular, Policy 7.1 set out the design principles required of new development and Policy 7.6 requires that architects should make a positive contribution to the public realm, streetscape and cityscape. Policy 7.8 asserts that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
46. The relevant Southwark design and conservation policies include Strategic Policy 12 of the Core Strategy and Saved Policies 3.12 ‘Quality in design’, 3.13 ‘Urban design’, 3.16 ‘conservation area’, and 3.18 ‘Settings of listed buildings, conservation areas and world heritage sites’. These policies require the highest possible standards for design for buildings and public spaces. The principle of good urban design must be taken into account in all developments, including height, scale and massing of buildings, consideration of the local context, including historic events, its character, and townscape strategic and local views.
47. The proposal is to replace the two 4/5 storey existing buildings on the site with one larger office building arranged parallel to Champion Park. The front elevation of the new building would be part four and part five storeys high. It would then have a distinctive setback before being stepped up to the sixth storey towards the rear as the hillside rises to the south. In comparison to the existing buildings on site, the proposed development would be larger both in terms of height and footprint, and be set slightly further forward on Champion Park, and thus have a more prominent visual presence. The application has proposed to remove the current boundary wall and railings and create new landscaping at the front of the site the details of which would be confirmed via a condition following the outcome of a tree survey
48. The applicant has provided a series of images which set the new building in the context of the wider College frontage. The new building is broadly the same order of scale as the college buildings further east along Champion Park. The sixth storey would largely be hidden from the views along Champion Park by the main frontage of

the building and its setback (but clearly evident from the rear). In addition the mature trees along Champion Park would form a partial screen to the site. It would be set back from the street by the same distance as the existing buildings to the east and be roughly the same length as its equivalent symmetrical building to the east of the tower, (buildings 04 and 03 on the campus). The culmination of these factors ensure that the proposed development responds to and integrates with the establish character and heritage of the area and in particular the William Booth Collage campus.



49. The western elevation would also have a prominent visual presence when travelling up Denmark Hill, and particularly at the intersection of Denmark Hill and Champion Park. Due to the small parcel of open land to the west of the site, the presence at the intersection would not be overly dominant as it would be 37m away from it.
50. To the rear of the site are two 6 storey blocks of flats (Allport House and Hannen House) which sit within small open spaces. The office block would be higher than the buildings to the rear of the site. However, due to the differences in ground level between the application site and the neighbouring properties (to the south) the proposed development would only appear one storey higher. The office would be built closer to the southern boundary line than the existing accommodation blocks, but the retained boundary open space and intervening access road means that the site would not appear cramped. Furthermore, the gradient would ensure that the office would not feel imposing over the open spaces that are located further south of the site.

Architectural design, fabric, function and composition

51. Saved policy 3.12 asserts that developments “should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit.” When the council reviews the quality of design we consider the appropriateness of the fabric, geometry and function as well as the overall concept for the design relative to the site. For a site such as this, these points are all imperative. The site forms part of a broader complex of powerful ‘beaux art gothic’ styled architecture which has asserted itself within the character of the area. In order for the proposed development to successfully integrate within the existing complex it will require a careful architectural response.
52. The main front façade of the four storey element is to be articulated as a series of brick buttresses with full height windows with vertical stone fins between. The infill between the windows would get progressively closer together from floor to floor. This

gives the main body an ordered and well proportioned appearance. The top floor would be setback from all four elevations and the glazing to the atrium is detailed in a more minimalist fashion. In this way the massing of the top floor is suppressed and lightened.



53. The end bay on the western side is raised a further storey above the main lower façade to form an elegantly detailed miniature tower as a full stop to composition and to articulate the prominent Champion Park and Denmark Hill corner. This also provides an opportunity for a large symbolic cross motif within the brickwork on the façade in this position.
54. The other facades include solid brick infill between the buttresses. At various places, notably the entrance to the building, the brick buttresses are omitted in order to allow the lighter weight filigree of fins and windows to break through.



55. The design is derived from the hierarchical composition of the Gothic forms of the original William Booth buildings but will be lighter and more subtle, and clearly identifiable as a modern addition to the site. The high quality finishes would ensure that the building would have an ordered character and composition that would respond well to the site's established surroundings.
56. The landscaping is also well considered. By removing the boundary walls around the site it would create a more public, civic forecourt to the building. This is a welcome addition and a public benefit of the scheme.

Heritage assets

57. As mentioned in the Site Location and Description section of this report, the nearest heritage assets include the following:

- To the east, the William Booth Memorial Training Collage (main building) as well as the statues of Mrs Booth and General Booth in the forecourt of the training collage - both are Grade II listed.
 - To the North West, 111 Denmark Hill - Grade II listed.
 - To the north, Denmark Hill Station - Grade II listed.
 - To the south east, 27 and 28 Champion Grove - Grade II listed
 - Camberwell Grove conservation area.
58. The central block of the William Booth Training Collage was completed in 1932. Its significance lies in its character as an example of Beaux Arts style architecture drawing upon the principles of French neoclassicism, Gothic and Renaissance elements. The listing description highlights the importance of the comparative scale between the four storey blocks and the massive central tower. The matching bricks and series of buttresses have a key role in the success in unifying the two opposing scales.
59. The listed Denmark Hill railway station, which includes the platforms and canopies, was completed in the 1864-1866. Its significance lies in its character as an example of high Victorian Gothic style and clinical use of a variety of materials.
60. The Camberwell Grove conservation area is based on two long residential streets of Camberwell Grove and Grove Lane. The conservation area also includes areas of historic interest in Champion Park, Denmark Hill, and Grove Park. The application site is located on the western side of the conservation which is characterised by strong institutional building complexes. There are two significant views to and from major landmarks in the area. The first is St. Giles Church Spire, which is located to the west of the conservation area, and the second is the tower of the Grade II listed building at the William Booth College.
61. Based on the information that has been submitted with this application, it shows that the proposed development would be visible from a variety of locations from which the two listed building can be seen. It would be clearly visible from both the western side of Champion Park, as well as from locations further north of the railway line, Windsor Walk and along Denmark Hill. However, from most of these view points the proposed development would not obstruct views of the listed buildings in their entirety or to an extent far greater than caused by the existing buildings on site.
62. As mentioned previously in this section, the proposed development has been designed in a way that aims to incorporate key elements of the broader William Booth College complex. The design has incorporated materials that are in keeping with those that are established and it would be built to a scale that would replicate the surrounding buildings. As such, it would not obstruct or detract views away from the listed building and/or the setting of the conservation area.



63. In addition to this if it were considered that there is harm due to the way that the proposal interacts visually with the views of the listed buildings, that harm is less than substantial and is certainly outweighed by the public benefits of the proposal.

Conservation Area Advisory Group comments (CAAG)

64. The scheme was presented to CAAG on 19 November 2018. The panel noted the following:

that the proposal involves demolition of two sensitively designed collegiate style residential 1980s buildings and that they are architecturally sympathetic to the Scott building in materials and scale and are sited to the side of the site's central building and tower. The two buildings to be demolished acknowledge the massing of those that they originally replaced which in turn relates to those on the uphill side of the frontage. It was stated that it is unlikely that the entire symmetrical main elevation of the campus is visible from any viewpoint in the area. The panel appreciated this but felt that the replacement of two smaller buildings of collegiate character with a much bigger, bulkier building of greater height and blatant commercial character did nothing to preserve or enhance the CA. Quite to the contrary, the panel thought the proposal not contextual, alien to the character of the rest of the campus and quite "without art".

The CAAG Panel had some sympathy with the applicant's motives but felt that a much more sensitive solution was required that had less obvious bulk and that paid a great deal more attention to the character of the site, the neighbouring buildings and the CA. They wondered whether a starting point might be to look at retaining, adapting and adding to the two existing buildings in an appropriate and sympathetic style in keeping with the collegiate character of the whole campus.

The choice of brick for the facing was clearly appropriate but the pinched appearance of the fenestration and the plain unimaginative commercial massing and elevational treatment of the building was all thought regrettable.'

65. In response to this the council believes that, the existing buildings are outside the conservation area even though they are part of the wider Salvation Army complex on Champion Park. Whilst the existing 1980s buildings fit discretely into the conservation area they are of no value in themselves and would not meet the test to be worthy of preserving.

66. The replacement headquarters building is larger and bulkier than the existing 1980s buildings. However, its street elevations are no higher than mid-rise buildings of the rest of the William Booth Memorial Training College complex and it is designed to be subservient to the Grade II Listed Main Block nearby on Champion Park. Its massing is carefully arranged such that it will not dominate the area or cause undue harm to the collegiate character of the complex. In addition, a screen of mature street trees and the very long street elevation of the overall complex (such that this elevation can not be seen in its entirety from any one viewpoint) also help to ease the new building into its surroundings.
67. The new building will be built in brick and stone. It will have finely crafted architectural details and a façade design that are derived from the design of the original buildings on the site and which are a modern day interpretation of the collegiate character of the campus.
68. In conclusion, the proposal could be judged to cause some limited harm to the setting of the conservation area arising from its visibility in this established historic context. However, any harm arising due to the limited visibility is outweighed by the public benefits of the development including the public realm improvements, its subservient relationship to the Main Building and the employment opportunities arising in this area.

Environmental impact assessment

69. The European SEA Directive is transposed into UK law by the Town and Country Planning (Environmental Impact assessment) (Amendment) Regulations 2017. The regulations set out the circumstances under which development needs to be underpinned by an Environmental Impact Assessment (EIA). Schedule 1 of the regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of developments for which an EIA might be required on the basis that it could give rise to significant environmental impacts. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.
70. The development is not considered to constitute EIA development, based on the size of their site and a review of the scheme against both the EIA Regulations and the European Commission guidance.

Impact of adjoining and nearby uses on occupiers and users of proposed development.

71. It is not anticipated that there would be any conflict of use that would have any adverse impact on occupiers of the proposed office.

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

Overlooking, outlook and privacy.

72. The nearest residential properties to the proposed development are located at Allport House and the flats on the upper floors of No. 121 Denmark Hill. The rear elevation of the flats at No. 121 Denmark Hill contains a series of high level slit windows. These windows would not be directly opposite the proposed development and there would be a distance of 21m separating the two buildings. In addition to this, the main habitable space faces out towards Denmark Hill. Therefore, officers are satisfied that the proposed development would not have a harmful impact on the privacy of the

occupiers at the flats at No.121.

73. The southern elevation of the proposed development would be directly opposite one of the flanking elevations at Allport House. This flanking elevation has one small single window on each of the floors. The development has proposed a series of windows which would be located slightly further to the west from the windows on Allport House, which would restrict direct views into the windows. Therefore there would not be a harmful loss of privacy. The two buildings would be separated by 15m. This would be less than the 21 metres requirements set out in the SPD. However, these windows do not serve as the main source of outlook for these flats, as the main outlook is to the east and west. Therefore, the main point of outlook would be preserved.
74. Building 9 on the William Booth College is located 18 metres away to the east of the most eastern elevation of the proposed development. Building 10, one of the two to be demolished, is located slightly closer to Building 9 in comparison to what has been proposed. Building 10 has a number of east facing windows providing views not dissimilar to what would be attained from the within proposed development. As such, the greater distance between the proposed east elevation and Building 9 and the fact that there are established views out towards Building 9 at present, would ensure that the impact on privacy of privacy would be no greater than what already exists, notwithstanding the different pattern of use of the proposed offices. Acceptable levels of outlook would be retained as the separation distances are sufficient to ensure there would be no significant sense of enclosure.
75. Building 8 of the William Booth Collage, located to the south east would be 26 metres away from the nearest point of the proposed development. This would exceed the 21 metres set out in the SPD but in addition to this, the opposing elevations would be set at an angle. The distance between the two buildings and the fact that the opposing elevations are not parallel to each other would ensure that there is no detrimental loss of privacy. Acceptable levels of outlook would be retained as the separation distances are sufficient to ensure there would be no significant sense of enclosure.

Daylight

76. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishment (BRE) guidelines on the daylight and sunlight.
77. The BRE sets out a rationale for testing the daylight impacts of new developments through various tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
78. The second method that can be used 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 more than 20% in the area of sky visibility, daylight may be affected. The following properties have been assessed as a part of the daylight and sunlight assessment.

Neighbouring Properties	No. of windows assessed - Daylight	No. of windows assessed - Sunlight
Allport House	36 windows/ 18 rooms	6 windows
Hannen House	36 windows/ 18 rooms	6 windows
Building 8 (WBC)	38 windows/ 12 rooms	38 windows
Building 9 (WBC)	38 windows/ 12 rooms	38 windows
121 Denmark Hill	13 windows/ 4 rooms	N/A -North-facing
123-127 Denmark Hill	4 windows/ rooms	N/A -North-facing
Total	165 windows/ 64 rooms	88 windows

Allport House

79. 36 windows and 18 rooms have been assessed at this property for VSC and DD respectively. Ten windows would have a VSC reduction that would exceed the BRE guidance. These reductions would vary between 21% - 38%. The worst affected windows are secondary windows serving rooms that are dual aspect. The two worst affected windows both serve rooms that are dual aspect, with the other windows being unaffected by the proposed development. In addition to this results of the daylight distribution test show that these rooms would be compliant with the BRE guidelines, showing that the rooms overall would continue to be well-lit. All rooms assessed for DD would remain within the BRE guidelines.

Hannen House

80. All windows and rooms assessed for VSC and DD would remain within the BRE guidelines.

Building 8, William Booth Training Collage

81. All windows and rooms assessed for VSC and DD would remain within the BRE guidelines.

Building 9, William Booth Training College

82. 38 windows and 12 rooms have been assessed at this property for VSC and DD respectively. Six windows would have a VSC reduction that would exceed the BRE guidance. These reductions would vary between 22% - 24%. These percentages are considered to be marginal losses. One room would see a DD reduction of 21% which is 1% higher than the BRE guideline figure of 20%. Once again this is a marginal reduction and when taking into consideration the acceptable VSC levels it is considered to be acceptable.

121 Denmark Hill

83. 13 windows and 4 rooms have been assessed at this property for VSC and DD respectively. One window would have a VSC reduction that would exceed the BRE guidance. The affected windows would see a reduction of 21% which is only 1% above the guidance limit and as such it is considered to be a marginal loss. All rooms assessed for DD would remain within the BRE guidelines.

123-127 Denmark Hill

84. All windows and rooms assessed for VSC and DD would remain within the BRE guidelines.

Sunlight

85. All of the windows facing within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states that nearby windows must be assessed to determine whether any of the following would be experienced:
- A reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH) or;
 - A reduction in sunlight to less than 5% Winter Annual Probable Sunlight Hours (WAPSH) or;
 - both of the above
86. Where any of the above occurs, if the window's resulting APSH is less than 0.8 times its former value, there may be an appreciable loss of sunlight.
87. The results of the sunlight analysis of the neighbouring residential properties demonstrate that out of the 88 site-facing windows which are orientated within 90 degrees of due south, 73 windows would meet the annual and winter sunlight criteria. All 15 of the windows which experience losses of sunlight beyond the BRE recommendations are located on Building 9 on the William Booth College. Out of the 15 affected windows, 50% of them falling below the annual criteria will do so only marginally and they are located on the two lowest floors of the building. The report has stated that the majority of these windows serve shared bedrooms which the BRE guide considers as less sensitive to a loss of sunlight, in comparison to habitable rooms. When taking these points into consideration it is of the case officer's opinion that the sunlight losses are permissible in this instance.
88. Overall, it is concluded that the proposed development would not have a detrimental impact on the quality of the amenity at the neighbouring resident's properties. The daylight and sunlight report substantiates that in case where the losses exceed the BRE guidance, the rooms would still receive an acceptable level of light due to them being dual aspect. Given the context of the site and the scale of development being proposed, overall the quality of the residential environment would be maintained.

Transport issues

89. Saved policy 5.1 of the Southwark Plan seeks to ensure that development is located near transport nodes or, where they are not, it must be demonstrated that sustainable transport options are available to site users and sustainable transport is promoted. In addition, saved policy 5.6 of the Southwark Plan requires development to minimise the number of car parking spaces provided and included justification for the amount of car parking sought taking into account the site's Public Transportation Accessibility Level (PTAL), the impact on overspill car parking, and the demand for parking within the controlled parking zone.

Public Transportation Accessibility

90. PTAL provides a useful guide as to the accessibility to an area. PTAL scores range from 1 to 6b, where 6b is the highest and 1 is the lowest. The site is located within an area with a very good (5-high) public transportation accessibility level. It is directly opposite the Denmark Hill train station and close to the busy bus routes on Denmark Hill. The additional demand on the public transport network arising from the use will have a marginal impact on overall capacity.

Car Parking

91. Apart from the one disabled car parking space that would be reserved for blue badge holders, the proposed development would not provide any additional on site car

parking spaces. Whilst the proposal would result in a loss of 15 of the existing 16 car parking spaces, this reduction is deemed satisfactory owing to the sites characteristics.

92. The disabled car parking space would be located in close proximity to the disabled access which is located on the eastern side of the building. The parking space would be accessed via the existing vehicle entrance on Champion Park. The swept path analysis that was submitted with the application demonstrates that a large vehicle would be able to access the parking bay and leave the site in a forward gear.
93. The applicant will also be required to equip the disabled bay with an active electric vehicle charging point.

Cycling parking

94. The applicant has proposed 64 two-tier cycling racks containing 128 spaces and 11 folding/enclosed spaces, which equates to 139 cycling parking spaces in the lower ground floor of the development. In addition to this there would be 16 Sheffield cycling racks (32) spaces on the upper ground floor. This amounts to a total of 171 cycle parking spaces being provided on site. This cycling parking level is significantly higher than the 93 spaces specified on the adopted London Plan and comparable to the required 185 spaces in the New London Plan.

Traffic

95. The applicant's consultants have estimated that the proposed development would generate eight two-way vehicle movement in the morning and three in the evening peak hours. The council's Transport Officers interrogation of comparable sites' travel survey within the TRICS travel database suggests that the office segment of this development would generate 11 two-way vehicle movements in the morning or evening peak hours while the café would produce none in the morning and two two-way vehicle movements in evening peak hours.
96. It is estimated that the existing buildings on site would create three two-way vehicle movements in the morning and one in the evening peak meaning that this development proposal would generate eight and 12 additional two-way vehicle movements in the morning and evening peak hours, respectively.
97. Although the councils net forecast two-way vehicle movements for the evening peak hours are higher than the three predicted by the applicant's consultant, both morning peak hour projections are comparable. Transport Officers consider that this development would not have any noticeable adverse impact on the traffic on the adjoining roads. Additionally, it has been demonstrated that the existing public transportation infrastructure at this location could accommodate the demand resulting from the development. The applicant has proposed travel plan initiatives including the provision of a travel pack including public transport information, shower/changing/locking facilities for cyclists plus participation in the government's tax saving cycling scheme which offers employees tax-free bicycles.

Pedestrian movement

98. The footway adjoining this site on Champion Park is narrow, and pedestrian movement is hindered by the mature Plane trees and the existing bus stop. The footways are busy in peak hours, with a light-controlled crossing linking the south side of Champion Park to Denmark Hill station.
99. The development would enable the high boundary fence to be removed, and a wider

footway to be created. The extent to which the footway can be widened is dependent on a detailed survey of the slope of the land and the position of primary roots to the trees on street and within the site. Some soft landscaping is proposed which will provide a suitable planting medium to ensure the long term good health of the trees, and also to provide an attractive frontage to the new building. Pedestrians will be able to move more freely on routes around the planting beds, including better options for linking to the existing footpath heading south parallel to Denmark Hill. Overall this will create a much more comfortable, convenient and attractive pedestrian realm.

Servicing

100. Following the construction of the proposed development, servicing and delivery access will be carried out via the existing vehicle entrance to the site. An access route would be provided directly to the goods lift and bin store which is located on the eastern side of the building.
101. The largest vehicle that will typically be required to access the site is a 7.5 tonne box van. The amended swept path analysis that has been provided demonstrates that a 7.5 tonne box van is able to access the site in a forward gear, reverse on-site, and then exit onto Champion Park in a forward gear.
102. The applicant has proposed a refuse collection system which integrates the office refuse store with the established process undertaken on the broader William Booth College site. The refuse bins stored on site will be loaded onto electric vehicles and transported along Champion Park to the rear of the William Booth College and taken to the existing refuse store. It would then be stored ready for collection by the main refuse collection company. As such, no large refuse vehicle will be required to access the application site.

Archaeology

103. The application site is not within an Archaeological Priority Zone (APZ) but it is partially located within the Camberwell Grove conservation area. Appraisal of this planning application using the Greater London Historical Environmental Record (GLHER) indicates that, in this instance, it can be concluded that the archaeological resource would not be compromised by the proposed works. No further archaeological assessment, fieldwork or conditions are required in consideration of the archaeological impact of this application.

Sustainable development implications

104. The submitted Energy Strategy demonstrates how the energy hierarchy has been applied to the proposed development in order to achieve the carbon reduction targets set out in Strategic Policy 13 of the Core Strategy and the London Plan. The Core Strategy and the London Plan also state that there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation wherever feasible. In addition the London plan expects development to achieve a reduction in carbon dioxide emissions of 35% over Part L of the 2013 Building Regulations.
105. The proposed development would incorporate a range of Be Lean, Be Clean; Be Green principles that result in an overall carbon reduction of 18.5% over Part L of the 2013 Building Regulations which would not be compliant with the London Plan. As part of policy 5.2 of the London Plan, where it is demonstrated that the specific targets for carbon dioxide emissions reduction cannot be fully achieved on-site the shortfall in emissions should be offset, through a financial contribution. The Energy Strategy has provided an estimated calculation for an offset payment of £40,320; this figure can be

secured through the s106 agreement.

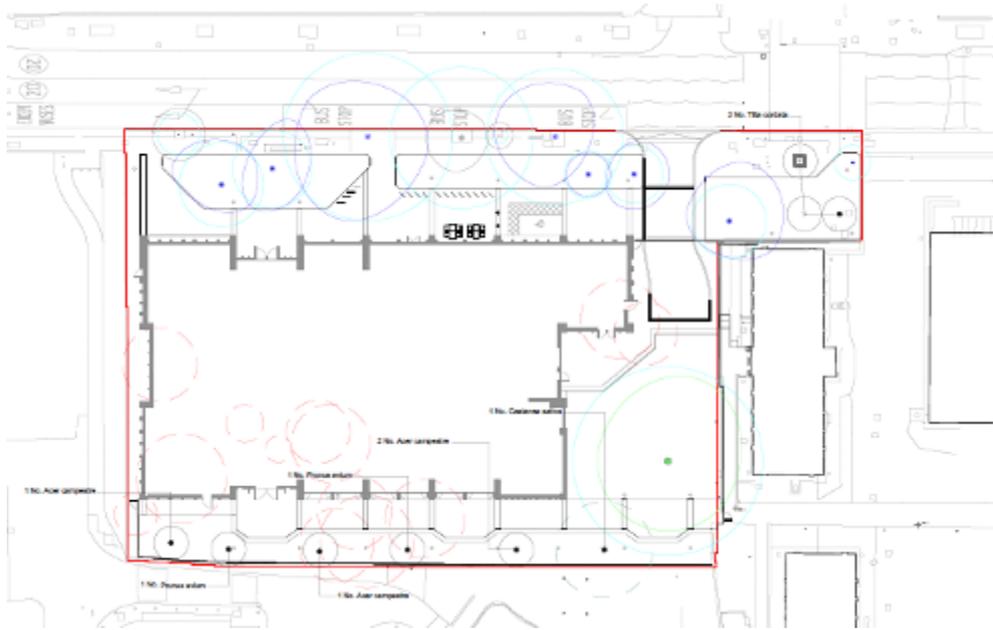
BREEAM

106. The new building will be required to meet BREEAM 'Excellent' and the Sustainability and Energy Statement submitted with the application indicates that this category is achievable for the proposed new building. Attaining BREEAM 'Excellent' for the overall development will be a condition requirement of any consent issued.

Other matters

Trees

107. The tree stock on site generally forms part of linear groups along the northern and southern boundaries. Those which are located within the northern (Champion Park) boundary are considered to be of high amenity value. These trees also provide a natural screening and serve to soften the appearance of the existing buildings. The trees towards the rear of the site also provide a level of amenity but in comparison to those on the northern boundary are slightly less visually prominent on the site.
108. The application site has 25 categorised trees. Out of the 25 trees on site, nine category B and three category C trees have been identified for removal in order to facilitate this development. The majority of the trees that would be removed are located to the rear of the site. The applicant has proposed that the loss can be mitigated through the planting of semi-mature stock during the landscaping phase. However, the councils Urban Forester has identified that there would be a net loss of 283cm diameters (stem girth). In the event that full replacement cannot be achieved on site, the applicant would be required to enter into an s106 agreement to pay financial contributions to compensate for this loss.
109. The applicant's tree specialist has also identified 1 Category A and 7 category B trees that would be at risk of damage as a result of disturbance to their Root Protection Area (RPA). The 1 category A tree which has a designated Tree Preservation Order (TPO) is a Cedar tree located on the south eastern corner of the site. In order to facilitate the development the applicant has proposed the construction of a new retaining wall to the north and south of the tree. Following a detailed root investigation by the applicant's tree specialist, the line of the northern retaining wall has been modified to clear the existing significant roots. This retaining wall has been extended from the original proposed line by an additional 6m. Both the applicant's trees specialist and the councils Urban Forester are satisfied that that this amendment in conjunction with standard precautionary measure and arboriculture supervision, would ensure that the tree would not be harmed.
110. The other significant trees around the boundaries of the site are the 7 large Plane trees within the Champion Park footway. In order to ensure that these existing trees are successfully retained, detailed Arboricultural Method Statement and Tree Protection Plan would need to be submitted and approved by the council. This can be secured by means of planning conditions attached to the decision notice.



Air quality and noise

111. The Councils Environmental Protection Team have recommended a series of conditions aimed at protecting amenity for adjacent occupiers in order to minimise disturbance from noise and odours. The relevant conditions will be imposed on any consent issued and will need to be satisfied prior to any development taking place.

Flood risk

112. The application site is located within the Flood Zone 1 which is defined as having a low probability of river and sea flooding. However, the applicant has submitted a Flood Risk Assessment which investigated the possibility of groundwater flooding and flooding from other sources at the site. The report concluded that there would be a low risk of groundwater flooding across the site. Whilst the site is located within a critical drainage area, the report found that once again there is a very low risk of flooding as a result of surface water. The Environmental Agency was consulted on the application and has not raised any objections to the reports findings.

Planning obligations (S.106 undertaking or agreement)

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

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

114. The following planning obligations are in the process of being agreed to at the time of completing this report.

- Transport for London is currently working on providing an estimated figure for

contributions necessary to mitigate the impacts of this development on capacity at the Denmark Hill Station.

- An estimated £40,320 carbon offset payment.
- A minimum estimation of £26,007 compensation for tree loss on the site, in the event that trees cannot be replaced on site.

Community infrastructure levy (CIL)

115. 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.
116. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure to support growth. In this instance an estimated Mayoral CIL payment of £234,176.63 and a Southwark CIL payment £25,144.39 would be required. The exact figures would be agreed to in an s106 agreement, and it is likely that the Salvation Army could claim CIL relief if the building is accepted to fulfil their charitable objectives.

Conclusion on planning issues

117. The Salvation Army has found that the existing offices no longer best meet their needs, and bringing the headquarters offices to the existing William Booth College site will not only make better use of their existing land holdings but will also create efficiencies and synergies. The offices would be outside the town centre boundary, but the NPPF recognises that locational policies should be applied flexibly where the development is in response to the specific needs of a sect. The site is well-located for public transport, and the scale and nature of the development has not given rise to any significant impacts on amenity or local services.
118. The building has been designed in a way that aims to incorporate key elements of the broader William Booth College complex, using high quality natural materials to ensure that the building would compliment the heritage assets. Although taller than its immediate context, the building would be seen in a wider townscape which includes the substantial buildings on the Kings College hospital site. The removal of the boundary fencing gives the opportunity to significantly improve the pedestrian environment on a key route south from Denmark Hill station. The removal of a number of trees on site can be justified, and amendments were made to the scheme to protect a Class A tree; new tree planting, and measures to protect established street trees will be secured by condition
119. The benefits of the development, in terms of efficient use of land, improved public realm and quality of design are considered to outweigh any harm to amenity, and therefore it is recommended that planning permission be granted, subject to completion of a s106 agreement to secure compensation for added pressure on the Denmark Hill Station, loss of trees on site and the carbon reduction offset. In the event that s106 is not signed, by 19 June 2019 then a decision to refuse the application would be taken by the council.
120. In the event that an agreement has not been completed by 19 June 2019, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reasons:

“In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on public realm, transport network or employment and the proposal would therefore be contrary to Saved Policy 2.5 'Planning Obligations' of the Southwark Plan and Policy 14 - 'Implementation and delivery' of the Southwark Core Strategy, the Southwark Supplementary Planning Document 'Section 106 Planning Obligations' 2015, and Policy 8.2 Planning obligations of the London Plan.”

Consultations

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

Statement of community involvement

122. A Statement of Community Involvement (SCI) has been submitted with the application which sets out consultation on the proposal which was undertaken by the developer before the planning application was submitted. A public exhibition was held at William Booth College on 17 and 19 July 2018, which 3,200 local residents and businesses were invited to attend. Over the two days, 61 people attended the public exhibition. In addition, the Camberwell Society attended and also a representative of the Twentieth Century Society.
123. In addition, all interested parties were given the opportunity to give their feedback regarding the proposals via a number of different channels. As well as the feedback forms available at the two public exhibitions, the freephone information line, project website and email address have been made available since the original publicity flyer was posted to the 3,200 addresses surrounding the site. Therefore, all interested parties have been able to engage in the consultation period open for two months prior to the submission of the planning application.
124. Feedback received included support for the concept of redeveloping the site and making it feel more accessible to the community by removing the fence and having a café. Concerns raised include the height and massing of the proposal, loss of parking, increase in pedestrian movement, loss of daylight and sunlight, design and a loss of community space.

Consultation replies

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

Summary of consultation responses

Environmental Agency

126. No objection.

Historic England

127. No objection.

London Underground

128. No objection.

Metropolitan Police Service

129. The hotel and associated uses will help to activate this area. There are several internal design points that should be incorporated to reduce crime and a condition should be imposed that will require the development to attain Secured by Design certification.

Response - Officers agree that a 'Secured by Design' condition should be imposed and this will require the applicant to liaise with the police to incorporate the various design interventions to reduce crime

Natural England

130. No objection.

Thames Water

131. No objection.

Transport for London

- 132.
- Clarification is sought whether the cycle parking is in accordance with the London Cycle Design Standards (LCDS) and as to the provision of staff lockers, showers and changing facilities. All these should be secured by condition along with a car and cycle Parking Management Plan.
 - The provision of (only) blue badge parking is welcomed, however the space should be provided with Electric Vehicle Charging Points (EVCP) in accord with draft London Plan standards
 - A Construction Logistics and Management Plan in accordance with TfL guidance. This should be secured by condition.
 - A Travel Plan should be appropriately secured.
 - Delivery and servicing is proposed to take place on site which is welcomed by TfL, this should be secured by condition.
 - Section 106 agreements to be confirmed.
 - In terms of trip generation, TfL dispute the reasoning behind discounting staff that work less than 17.5hrs per week and this should be adjusted accordingly.
 - Any permanent works that may affect the bus stop adjacent to the site should be agreed with TfL prior to occupation and if related to construction then agreed to prior to works including demolition and site preparation commencing as part of the CL/MP.

Response

Section 106 agreements are being negotiated at present. Request for an Electric Vehicle Charging Point (EVCP) for blue badge parking bay will be conditioned. Construction Logistics and management plan, Travel plan, delivery and servicing plan, to be requested through a condition. The bus stop has not been proposed to move.

133. Following neighbour consultation, 8 responses have been received all of which expressed reasons for refusal for the proposed development. The main points of objection have been summarised and addressed below.

Objection

134. The scale, massing and design of the proposed building are out of character.

Response- The proposed development incorporated a number of key elements from the design and appearance of the existing William Booth College. The height would be slightly higher than the majority of the buildings on the campus, particularly those along Champion Hill. Whilst final details of the proposed materials would need to be assessed via a condition, the scheme has shown that the materials would be in keeping with those established on the existing college buildings.

Objection

135. The development would detract away from the adjacent historic building and conservation area.

Response- the proposed development has been designed in a way that aims to incorporate key elements of the broader WBC complex, which includes the Grade II listing. The design has incorporated materials that are in keeping with those that are established and it would be built to a scale that takes into account the surrounding context.

Objection

136. The development would disrupt the views and cause a loss of outlook for residents.

Response- The nearest residential properties to the proposed development are located at Allport House. This flanking elevation has one small single window on each of the floors. There two buildings would be separated by 15m. This would be less than the 21 metres requirements set out in the SPD. However, these windows do not serve as the main source of outlook for these flat, as the main outlook is to the east and west. Therefore, the main point of outlook would be preserved.

Objection

137. It would cause a loss of daylight and sunlight for local residents.

Response-The daylight and sunlight report that has been submitted with this application has shown that the large majority of the neighbouring residential properties would experience little or no loss of daylight and sunlight. However, the worst affected windows, which would be at Allport House, are secondary windows serving rooms that are dual aspect. In addition to this results of the daylight distribution test show that these rooms would be compliant with the BRE guidelines, showing that the rooms overall would continue to the well-lit.

Objection

138. Change of use from residential to commercial is inappropriate. In addition, there have been a few comments which question the need for Salvation Army to have another office building.

Response- Class C2 use remains to be the lawful use for the site. The C2 use is not protected under development plan policies and therefore the loss of C2 is considered acceptable. The office would replace the existing headquarters in Elephant and Castle to the application site and not the provision of another office building under the ownership of the Salvation Army.

Objection

139. The construction process would cause the inconvenience of noise and dust disturbance.

Response- As detailed above, officers consider that the use of planning conditions/obligations regarding servicing, management and hours of operation would be able to appropriately mitigate any potential adverse impacts.

Objection

140. There would be an increase in traffic congestion and added pressure on the parking provision in the area.

Response- There would be no parking space provided on the site and the office employees would not be liable to apply for parking permits in the area. Employees and

visitors to the site would need to use the existing public transportation or cycle into work.

Objection

141. There would be added pressure on the capacity of the train station.

Response- Transport For London is currently working on providing an estimated figure for contributions necessary to mitigate the impacts of this development on capacity at the Denmark Hill Station. This would be secured in the s106 agreement.

Objection

142. Where will the families who currently live there go?

Response- In 2017 the Salvation Army were given temporary planning permission, for a period of up to five years, the use buildings 10 and 11 as short term housing for asylum seekers awaiting permanent homes. The flats were no longer needed for the salvation Army member families, The Salvation Army have confirmed that all refugee/asylum seekers that were housed in buildings 10 and 11, in the lead up to submission of this application, have been re-housed within the Borough. The Salvation Army has assured the council that all appropriate measures had been put in place in the lead up to and post the relocation process.

Human rights implications

143. 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.

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

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/2166-A Application file: 18/AP/3144 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: 0207 525 0952 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Christopher Kirby, Graduate Planning Officer	
Version	Final	
Dated	8 March 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		8 March 2019

Consultation undertaken

Site notice date: 15/10/2018

Press notice date: 18/10/2018

Case officer site visit date: n/a

Neighbour consultation letters sent: 15/10/2018

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

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

Neighbour and local groups consulted:

Flat 96 Ruskin Park House SE5 8TH	Flat 6 Ruskin Park House SE5 8TQ
Flat 97 Ruskin Park House SE5 8TH	Flat 7 Ruskin Park House SE5 8TQ
Flat 95 Ruskin Park House SE5 8TH	Flat 8 121 Denmark Hill SE5 8EN
Flat 93 Ruskin Park House SE5 8TH	Flat 9 121 Denmark Hill SE5 8EN
Flat 94 Ruskin Park House SE5 8TH	Flat 7 121 Denmark Hill SE5 8EN
Flat 10 Ruskin Park House SE5 8TQ	Flat 5 121 Denmark Hill SE5 8EN
Flat 11 Ruskin Park House SE5 8TQ	Flat 6 121 Denmark Hill SE5 8EN
Flat 1 Ruskin Park House SE5 8TQ	Flat 13 121 Denmark Hill SE5 8EN
Flat 98 Ruskin Park House SE5 8TH	Fetal Medicine Research Institute 16-20 Windsor Walk SE5 8BB
Flat 99 Ruskin Park House SE5 8TH	Flat 12 121 Denmark Hill SE5 8EN
Flat 92 Ruskin Park House SE5 8TH	Flat 10 121 Denmark Hill SE5 8EN
Flat 85 Ruskin Park House SE5 8TH	Flat 11 121 Denmark Hill SE5 8EN
Flat 86 Ruskin Park House SE5 8TH	Flat 4 121 Denmark Hill SE5 8EN
Flat 84 Ruskin Park House SE5 8TH	Flat 213 William Booth Training College SE5 8BQ
Flat 82 Ruskin Park House SE5 8TH	Flat 722 William Booth Training College SE5 8BQ
Flat 83 Ruskin Park House SE5 8TH	14b William Booth Training College Champion Park SE5 8BQ
Flat 90 Ruskin Park House SE5 8TH	House 12a William Booth Training College SE5 8BQ
Flat 91 Ruskin Park House SE5 8TH	House 12b William Booth Training College SE5 8BQ

Flat 89 Ruskin Park House SE5 8TH
 Flat 87 Ruskin Park House SE5 8TH
 Flat 88 Ruskin Park House SE5 8TH
 Flat 25 Ruskin Park House SE5 8TQ
 Flat 26 Ruskin Park House SE5 8TQ
 Flat 24 Ruskin Park House SE5 8TQ
 Flat 22 Ruskin Park House SE5 8TQ
 Flat 23 Ruskin Park House SE5 8TQ
 Flat 3 Ruskin Park House SE5 8TQ
 Flat 30 Ruskin Park House SE5 8TQ
 Flat 29 Ruskin Park House SE5 8TQ
 Flat 27 Ruskin Park House SE5 8TQ
 Flat 28 Ruskin Park House SE5 8TQ
 Flat 21 Ruskin Park House SE5 8TQ
 Flat 15 Ruskin Park House SE5 8TQ
 Flat 16 Ruskin Park House SE5 8TQ
 Flat 14 Ruskin Park House SE5 8TQ
 Flat 12 Ruskin Park House SE5 8TQ
 Flat 13 Ruskin Park House SE5 8TQ
 Flat 2 Ruskin Park House SE5 8TQ
 Flat 20 Ruskin Park House SE5 8TQ
 Flat 19 Ruskin Park House SE5 8TQ
 Flat 17 Ruskin Park House SE5 8TQ
 Flat 18 Ruskin Park House SE5 8TQ
 Flat 119 Ruskin Park House SE5 8TH
 Flat 120 Ruskin Park House SE5 8TH
 Flat 118 Ruskin Park House SE5 8TH
 Flat 116 Ruskin Park House SE5 8TH
 Flat 117 Ruskin Park House SE5 8TH
 Flat 59 Ruskin Park House SE5 8TH
 Flat 60 Ruskin Park House SE5 8TH
 Flat 58 Ruskin Park House SE5 8TH
 Flat 56 Ruskin Park House SE5 8TH
 Flat 57 Ruskin Park House SE5 8TH

 Flat 115 Ruskin Park House SE5 8TH
 Flat 108 Ruskin Park House SE5 8TH

 Flat 109 Ruskin Park House SE5 8TH

 Flat 107 Ruskin Park House SE5 8TH
 Flat 105 Ruskin Park House SE5 8TH
 Flat 106 Ruskin Park House SE5 8TH
 Flat 113 Ruskin Park House SE5 8TH
 Flat 114 Ruskin Park House SE5 8TH
 Flat 112 Ruskin Park House SE5 8TH
 Flat 110 Ruskin Park House SE5 8TH
 Flat 111 Ruskin Park House SE5 8TH
 Flat 75 Ruskin Park House SE5 8TH
 Flat 76 Ruskin Park House SE5 8TH
 Flat 74 Ruskin Park House SE5 8TH
 Flat 72 Ruskin Park House SE5 8TH
 Flat 73 Ruskin Park House SE5 8TH
 Flat 80 Ruskin Park House SE5 8TH
 Flat 81 Ruskin Park House SE5 8TH
 Flat 79 Ruskin Park House SE5 8TH
 Flat 77 Ruskin Park House SE5 8TH
 Flat 78 Ruskin Park House SE5 8TH
 Flat 71 Ruskin Park House SE5 8TH
 Flat 64 Ruskin Park House SE5 8TH
 Flat 65 Ruskin Park House SE5 8TH
 Flat 63 Ruskin Park House SE5 8TH
 Flat 61 Ruskin Park House SE5 8TH
 Flat 62 Ruskin Park House SE5 8TH
 Flat 69 Ruskin Park House SE5 8TH
 Flat 70 Ruskin Park House SE5 8TH
 Flat 68 Ruskin Park House SE5 8TH
 Flat 66 Ruskin Park House SE5 8TH
 Flat 67 Ruskin Park House SE5 8TH
 Flat 31 Ruskin Park House SE5 8TQ
 Block 11 Flat 9 William Booth Training College SE5 8BQ
 First Floor And Second Floor Flat 100 Grove Lane SE5 8BJ
 Block 11 Flat 16 William Booth Training College SE5 8BQ
 Block 11 Flat 14 William Booth Training College SE5 8BQ
 Block 11 Flat 15 William Booth Training College SE5 8BQ

 Flat 2 121 Denmark Hill SE5 8EN
 Flat 3 121 Denmark Hill SE5 8EN
 Flat 1 121 Denmark Hill SE5 8EN
 Douglas Bennett House Maudsley Hospital SE5 8AZ
 29 Champion Grove London SE5 8BN
 35 Champion Grove London SE5 8BN
 27 Champion Grove London SE5 8BN
 98 Grove Lane London SE5 8BJ
 49 Champion Grove London SE5 8BN
 51 Champion Grove London SE5 8BN
 37 Champion Grove London SE5 8BN
 Maudsley Hospital Denmark Hill SE5 8AZ
 102 Grove Lane London SE5 8BJ
 Aubrey Lewis House Maudsley Hospital SE5 8AZ
 Flat 14a William Booth Memorial Training College SE5 8BQ
 Flat 201 William Booth Memorial Training College SE5 8BQ
 11 Windsor Walk London SE5 8BB
 Ronald Mcdonald House 6 Windsor Walk SE5 8BB
 115 Denmark Hill London SE5 8AQ
 111 Denmark Hill London SE5 8AQ
 113 Denmark Hill London SE5 8AQ
 Flat 11 123 Denmark Hill SE5 8EJ
 Flat 12 123 Denmark Hill SE5 8EJ
 Flat 10 123 Denmark Hill SE5 8EN
 Flat 5 123 Denmark Hill SE5 8EJ
 Flat 1 123 Denmark Hill SE5 8EJ
 Flat 7 123 Denmark Hill SE5 8EN
 Flat 8 123 Denmark Hill SE5 8EJ
 Flat 4 123 Denmark Hill SE5 8EJ
 Flat 2 123 Denmark Hill SE5 8EN
 Flat 3 123 Denmark Hill SE5 8EJ
 Flat 13 123 Denmark Hill SE5 8EN
 41 Champion Grove London SE5 8BN
 Administration Block William Booth Memorial Training College SE5 8BQ
 121 Denmark Hill London SE5 8EN
 Residential Block 10 William Booth Memorial Training College SE5 8BQ
 Residential Block 11 William Booth Memorial Training College SE5 8BQ
 Flat 9 127 Denmark Hill SE5 8EJ
 Flat 10 127 Denmark Hill SE5 8EJ
 Flat 8 127 Denmark Hill SE5 8EJ
 Flat 6 127 Denmark Hill SE5 8EJ
 Flat 7 127 Denmark Hill SE5 8EJ
 Humpty Dumpty Nursery William Booth Training College SE5 8BQ
 Assembly Hall Windsor Walk SE5 8BB
 Flat 11 127 Denmark Hill SE5 8EJ
 Flat 12 127 Denmark Hill SE5 8EJ
 Flat 5 127 Denmark Hill SE5 8EJ
 Ground Floor Block 9 William Booth Training College SE5 8BQ
 125 Denmark Hill London SE5 8EJ
 Flat 6 123 Denmark Hill SE5 8EJ
 Flat 9 123 Denmark Hill SE5 8EJ
 Flat 3 127 Denmark Hill SE5 8EJ
 Flat 4 127 Denmark Hill SE5 8EJ
 Flat 2 127 Denmark Hill SE5 8EJ
 Flat 1 127 Denmark Hill SE5 8EJ
 1 Pirie Close London SE5 8TF
 Flat 7 Hannen House Champion Park Estate SE5 8TE
 Flat 8 Hannen House Champion Park Estate SE5 8TE
 Flat 6 Hannen House Champion Park Estate SE5 8TE
 Flat 4 Hannen House Champion Park Estate SE5 8TE
 Flat 5 Hannen House Champion Park Estate SE5 8TE
 Flat 224 Ruskin Park House SE5 8TG
 Flat 225 Ruskin Park House SE5 8TG
 Flat 223 Ruskin Park House SE5 8TG
 Flat 9 Hannen House Champion Park Estate SE5 8TE
 Flat 222 Ruskin Park House SE5 8TG
 Flat 3 Hannen House Champion Park Estate SE5 8TE
 Flat 19 Hannen House Champion Park Estate SE5 8TE

 Flat 2 Hannen House Champion Park Estate SE5 8TE
 Flat 18 Hannen House Champion Park Estate SE5 8TE
 Flat 16 Hannen House Champion Park Estate SE5 8TE
 Flat 17 Hannen House Champion Park Estate SE5 8TE

8BQ	Residential Block 3 Flat William Booth Training College SE5 8BQ	Flat 23 Hannen House Champion Park Estate SE5 8TE
	Residential Block 4 Flat William Booth Training College SE5 8BQ	Flat 24 Hannen House Champion Park Estate SE5 8TE
	Residential Block 2 Flat William Booth Training College SE5 8BQ	Flat 22 Hannen House Champion Park Estate SE5 8TE
	First Floor And Second Floor Flat 45 Champion Grove SE5 8BN	Flat 20 Hannen House Champion Park Estate SE5 8TE
	47b Champion Grove London SE5 8BN	Flat 21 Hannen House Champion Park Estate SE5 8TE
	Block 11 Flat 13 William Booth Training College SE5 8BQ	Flat 240 Ruskin Park House SE5 8TG
	Block 10 Flat 5 William Booth Training College SE5 8BQ	Flat 241 Ruskin Park House SE5 8TG
	Block 10 Flat 6 William Booth Training College SE5 8BQ	Flat 239 Ruskin Park House SE5 8TG
	Block 10 Flat 4 William Booth Training College SE5 8BQ	Flat 237 Ruskin Park House SE5 8TG
	Block 10 Flat 2 William Booth Training College SE5 8BQ	Flat 238 Ruskin Park House SE5 8TG
	Block 10 Flat 3 William Booth Training College SE5 8BQ	Flat 103 Ruskin Park House SE5 8TH
	Block 11 Flat 11 William Booth Training College SE5 8BQ	Flat 104 Ruskin Park House SE5 8TH
	Block 11 Flat 12 William Booth Training College SE5 8BQ	Flat 102 Ruskin Park House SE5 8TH
	Block 11 Flat 10 William Booth Training College SE5 8BQ	Flat 100 Ruskin Park House SE5 8TH
	Block 10 Flat 7 William Booth Training College SE5 8BQ	Flat 101 Ruskin Park House SE5 8TH
	Block 10 Flat 8 William Booth Training College SE5 8BQ	Flat 236 Ruskin Park House SE5 8TG
	Offices Adjacent Denmark Hill Railway Station SE5 8BB	Flat 229 Ruskin Park House SE5 8TG
	Residential Block 9 William Booth Training College SE5 8BQ	Flat 230 Ruskin Park House SE5 8TG
	Residential Block 7 William Booth Training College SE5 8BQ	Flat 228 Ruskin Park House SE5 8TG
	Residential Block 8 William Booth Training College SE5 8BQ	Flat 226 Ruskin Park House SE5 8TG
	Residential Block 6 William Booth Training College SE5 8BQ	Flat 227 Ruskin Park House SE5 8TG
	Ground Floor Flat 45 Champion Grove SE5 8BN	Flat 234 Ruskin Park House SE5 8TG
	47a Champion Grove London SE5 8BN	Flat 235 Ruskin Park House SE5 8TG
	Residential Block 7 Flat William Booth Training College SE5 8BQ	Flat 233 Ruskin Park House SE5 8TG
	Residential Block 5 Flat William Booth Training College SE5 8BQ	Flat 231 Ruskin Park House SE5 8TG
	Residential Block 6 Flat William Booth Training College SE5 8BQ	Flat 232 Ruskin Park House SE5 8TG
	Residential Block 4 William Booth Training College SE5 8BQ	Flat 12 Allport House Champion Park Estate SE5 8TD
	Residential Block 5 William Booth Training College SE5 8BQ	Flat 13 Allport House Champion Park Estate SE5 8TD
	Residential Block 3 William Booth Training College SE5 8BQ	Flat 11 Allport House Champion Park Estate SE5 8TD
	Residential Block 1 William Booth Training College SE5 8BQ	Flat 1 Allport House Champion Park Estate SE5 8TD
	Residential Block 2 William Booth Training College SE5 8BQ	Flat 10 Allport House Champion Park Estate SE5 8TD
	Flat 45 Ruskin Park House SE5 8TQ	Flat 17 Allport House Champion Park Estate SE5 8TD
	Flat 46 Ruskin Park House SE5 8TQ	Flat 18 Allport House Champion Park Estate SE5 8TD
	Flat 44 Ruskin Park House SE5 8TQ	Flat 16 Allport House Champion Park Estate SE5 8TD
	Flat 42 Ruskin Park House SE5 8TQ	Flat 14 Allport House Champion Park Estate SE5 8TD
	Flat 43 Ruskin Park House SE5 8TQ	Flat 15 Allport House Champion Park Estate SE5 8TD
	Flat 5 Ruskin Park House SE5 8TQ	Flat 2 39 Champion Grove SE5 8BN
	Flat 50 Ruskin Park House SE5 8TQ	102a Grove Lane London SE5 8BJ
	Flat 49 Ruskin Park House SE5 8TQ	4 Pirie Close London SE5 8TF
	Flat 47 Ruskin Park House SE5 8TQ	2 Pirie Close London SE5 8TF
	Flat 48 Ruskin Park House SE5 8TQ	3 Pirie Close London SE5 8TF
	Flat 41 Ruskin Park House SE5 8TQ	Flat B 53 Champion Grove SE5 8BN
	Flat 35 Ruskin Park House SE5 8TQ	Flat 1 39 Champion Grove SE5 8BN
	Flat 36 Ruskin Park House SE5 8TQ	Flat B 43 Champion Grove SE5 8BN
	Flat 34 Ruskin Park House SE5 8TQ	Flat A 43 Champion Grove SE5 8BN
	Flat 32 Ruskin Park House SE5 8TQ	Flat A 53 Champion Grove SE5 8BN
	Flat 33 Ruskin Park House SE5 8TQ	Flat 1 Hannen House Champion Park Estate SE5 8TE
	Flat 4 Ruskin Park House SE5 8TQ	Flat 10 Hannen House Champion Park Estate SE5 8TE
	Flat 40 Ruskin Park House SE5 8TQ	Flat 9 Allport House Champion Park Estate SE5 8TD
	Flat 39 Ruskin Park House SE5 8TQ	Flat 7 Allport House Champion Park Estate SE5 8TD

Flat 37 Ruskin Park House SE5 8TQ
Flat 38 Ruskin Park House SE5 8TQ
16 Windsor Walk London SE5 8BB
The Phoenix Windsor Walk SE5 8BB
4 Windsor Walk London SE5 8BB
Research Centre 1-3 Windsor Walk SE5 8BB
Admin Block Third Floor Flat 1 William Booth Training
College SE5 8BQ
Block 10 Flat 1 William Booth Training College SE5
8BQ
5 Windsor Walk London SE5 8BB
100a Grove Lane London SE5 8BJ
Denmark Hill Railway Station Windsor Walk SE5 8BB
Flat 54 Ruskin Park House SE5 8TQ
Flat 55 Ruskin Park House SE5 8TQ
Flat 53 Ruskin Park House SE5 8TQ
Flat 51 Ruskin Park House SE5 8TQ
Flat 52 Ruskin Park House SE5 8TQ
Flat 9 Ruskin Park House SE5 8TQ
Flat 8 Ruskin Park House SE5 8TQ
Flat 8 Allport House Champion Park Estate SE5 8TD
Flat 14 Hannen House Champion Park Estate SE5 8TE
Flat 15 Hannen House Champion Park Estate SE5 8TE
Flat 13 Hannen House Champion Park Estate SE5 8TE
Flat 11 Hannen House Champion Park Estate SE5 8TE
Flat 12 Hannen House Champion Park Estate SE5 8TE
Flat 6 Allport House Champion Park Estate SE5 8TD
Flat 21 Allport House Champion Park Estate SE5 8TD
Flat 22 Allport House Champion Park Estate SE5 8TD
Flat 20 Allport House Champion Park Estate SE5 8TD
Flat 19 Allport House Champion Park Estate SE5 8TD
Flat 2 Allport House Champion Park Estate SE5 8TD
Flat 4 Allport House Champion Park Estate SE5 8TD
Flat 5 Allport House Champion Park Estate SE5 8TD
Flat 3 Allport House Champion Park Estate SE5 8TD
Flat 23 Allport House Champion Park Estate SE5 8TD
Flat 24 Allport House Champion Park Estate SE5 8TD
117 Marden Square London SE16 2JB

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

Economic Development Team

Statutory and non-statutory organisations

Environment Agency

Historic England

London Underground Limited

Metropolitan Police Service (Designing out Crime)

Natural England - London Region & South East Region

Thames Water - Development Planning

Neighbours and local groups

Flat 10 121 Denmark Hill SE5 8EN

Flat 13 121 Denmark Hill SE5 8EN

Flat 16 Hannen House Champion Park Estate SE5 8TE

Flat 22 Allport House Champion Park Estate SE5 8TD

Flat 26 Ruskin Park House SE5 8TQ

Flat 90 Ruskin Park House SE5 8TH

117 Marden Square London SE16 2JB

35 Champion Grove London SE5 8BN