

<b>Item No.</b> 6.2	<b>Classification:</b> Open	<b>Date:</b> 2 April 2019	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 18/AP/0091 for: Full Planning Application  <b>Address:</b> DOCKLEY ROAD INDUSTRIAL ESTATE, 2 DOCKLEY ROAD, LONDON, SE16 3SF  <b>Proposal:</b> Demolition of the existing industrial units and redevelopment to provide a building ranging from one to nine storeys (32.55m AOD and 29.9m above ground) in height accommodating 1,093sqm of commercial floorspace at ground floor level incorporating industrial use (Use Class B8); retail uses (Use Class A1); and restaurants and cafe uses (Use Class A3) and 111 residential units (Class C3) at upper levels with associated works, including landscaping and 3 disabled car parking spaces.		
<b>Ward(s) or groups affected:</b>	South Bermondsey		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 02/02/2018		<b>Application Expiry Date</b> 04/05/2018	
<b>Earliest Decision Date</b> 10/03/2018			

## RECOMMENDATION

1.
  - (a) That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement by no later than 31 August 2019.
  - (b) In the event that the requirements of (a) are not met by 31 August 2019, that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 148 of this report.

## UPDATE ON ACTIONS SINCE DEFERRAL OF CONSIDERATION OF THE APPLICATION ON 15 JANUARY 2019

2. This application was originally referred to the Planning Committee on 15 January 2019. At that time there was some ambiguity around the height of the building above ground, particularly focussed on the impact of a lift over-run. The initial plans submitted with the application demonstrated that the building did not exceed 30 metres in height when measured from ground level. Revised plans submitted in advance of Committee appeared to show a small projection at roof level that would have taken the building beyond the 30 metres threshold. The applicant confirmed that this was an error on the drawings and the item was deferred in order to give the applicant time to review and correct the relevant drawings. This issue was important as the application would be referable to the Mayor of London if the height of the development above ground exceeded 30 metres.

3. Revised drawings were submitted by the applicant on 27 February 2019 alongside a revised Daylight and Sunlight Assessment. A re-consultation exercise commenced on 8 March 2019. The submitted drawings demonstrate that the building would not exceed 30 metres in height above ground level. For that reason the application is not referable to the Mayor of London, and would not be considered a 'tall building' under saved Southwark Plan policy 3.20.

## **EXECUTIVE SUMMARY**

4. In 2017 the Council granted planning consent for the redevelopment of the site at Dockley Road Industrial Estate. The consented scheme was designed as a podium building arranged in a horseshoe shape open to the railway viaduct. The consented scheme included Class A1 (retail) and B8 (storage/warehouse) floorspace as well as 59 apartments in a building rising to seven storeys. 25 car parking spaces were provided in the ground floor podium. This permission has not been implemented.
5. The proposed development maintains many aspects of the consented scheme, particularly with regards to the basic building form and range of uses. There would be a significant uplift in the number of residential units (from 59 to 111) as well as an increase in the level of affordable housing being provided (from 30% to 35.5%). The increased number of homes would be achieved through increasing the height from seven storeys to a maximum of nine storeys.
6. The proposed development would provide a policy compliant mix and type of housing as well as 35.5% on site affordable housing with an appropriate split between social rented and shared ownership (70:30). The new homes would offer an exemplary standard of accommodation for future occupiers as well as high quality communal amenity spaces and play spaces for children.
7. There is no policy requirement in this location to replace B Class floorspace when sites are redeveloped, so the reduction in employment floorspace is acceptable in this instance. The scheme does however include a range of units for retail and warehousing purposes which activate the ground floor frontages and some of these units face onto a 'Low Line' route alongside the viaduct which would be open to the public at weekends to complement the existing market trading in the area.
8. There would be noticeable impacts on some neighbouring residents in terms of daylight and sunlight however these are considered to be acceptable within the context of the BRE guidelines and the surrounding townscape.
9. Thirty nine objections have been received from neighbours raising concerns primarily relating to height, design, massing and density, sunlight and daylight impacts, parking provision, commercial uses and failure to provide a policy compliant level of affordable housing. A further seventy five objections have been received following re-consultation raising the same issues. Six letters of support have also been received.
10. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a contribution to the Council's Carbon Off-set Green Fund would be secured through a s106 agreement. The proposal would be air quality neutral, and conditions are recommended to ensure that surface water drainage, archaeology and ecology would be adequately dealt with. A range of s106 obligations would be secured, including

employment and training during the course of construction. Overall, the benefits of the proposal are considered to outweigh the potential harm caused, and it is recommended that planning permission be granted, subject to conditions and the signing of a S106 agreement.

## **BACKGROUND INFORMATION**

### **Site location and description**

11. The application site is the 0.36 hectare Dockley Road Industrial Estate which is located between Spa Road, Dockley Road and Rouel Road in Bermondsey. The north eastern boundary of the site is bounded by the railway viaduct linking South Bermondsey to London Bridge Station.
12. The site is currently occupied by two rows of 1970s brick built industrial sheds comprising 11 Class B8 units with a total net internal floorspace of 1,850sqm. The two rows of buildings face inwards onto a central service yard with accesses onto Rouel Road and Dockley Road which are secured by metal palisade fencing.
13. The surrounding area is characterised by predominantly flatted residential accommodation with some commercial use in the railway arches to the north east. To the south east of the site lies Eldridge Court and the Lucey Way Estate comprising four to eight storeys of brick built flats. On Rouel Road to the west of the site is the recently completed Porters Building providing flats over four to seven storeys. The residential Bolonachi Building is located to the north west of the site and is part six/part eight storeys high.
14. The wider area has changed significantly over the past decade as a result of new housing schemes being delivered under the 'Bermondsey Spa' programme of redevelopment. This has increased the height and density of development in the area, and created a neighbourhood with a more distinctly residential character.
15. In terms of public transport the site lies approximately 450 metres to the south west of Bermondsey Underground Station and the nearest bus stops are located on Jamaica Road to the north (services 47, 188, 381, C10, N47 and N381) and Southwark Park Road to the south (services 1, N1, 381, N381, P12). The site has a PTAL of 3 which indicates a medium level of access to public transport.
16. The site is not within or close to any conservation areas although the adjacent Spa Road Railway Bridge is Grade II listed.

*Image – Site plan*



*Image – Aerial site plan*



### **Details of proposal**

17. Planning consent is sought for a comprehensive mixed-use redevelopment of the site for Class A1 use (Retail); Class A3 use (café/restaurant); Class B8 use (warehouse and distribution); and 111 residential units (including 11 units suitable for wheelchair users), laid out in a perimeter block building ranging from 1-9 storeys in height.

The schedule of accommodation is set out below:

*Table 1 – Schedule of accommodation*

Unit Type	Private (units)	Affordable Housing (units)		Total
		Social Rent	Intermediate	
1 bed	36	5	3	44
2 bed	34	6	5	45
3 bed	11	9	2	22
<b>Total</b>	81	20	10	111

18. Building footprint largely follows the boundaries of the site in a horseshoe form with the open end (above a single storey commercial unit) towards the railway viaduct and a ground level courtyard amenity space located at the centre of the site.
19. The proposed building would be highly articulated in terms of height with the tallest elements located at the corner of Spa Road/Rouel Road and on Dockley Road where it meets the railway viaduct. Heights would gradually step down from these points to four storeys on Dockley Road and five storeys on Rouel Road with a further small rise to six storeys on the corner of Rouel Road and Dockley Road. At the railway end of the building the height would reduce to one storey.
20. The development would employ robust materials. The facades would be brick at ground floor level, changing to a metal frame on the upper levels marking the change from commercial to residential. The frame would wrap around all of the upper floors on the street facing facades and would support the triangulated residential balconies. Four residential cores would be provided with all flats accessed from decks facing inwards towards the central courtyard space.
21. The Class A1 and A3 units would be located at ground floor on Spa Road, Rouel Road and Dockley Road. The Class B8 unit would be located to the rear of the site immediately adjacent to the railway viaduct. The route alongside the viaduct would be open to pedestrians at the weekend as part of the wider 'Low Line' aspiration, with the commercial spaces on both sides open as market trading spaces.
22. The proposed development would be car free with the exception of three accessible car parking spaces. A servicing route would be provided at the railway end of the building with one way access from Dockley Road and egress onto Spa Road which is in line with the previously consented scheme.

### **Planning history**

#### 13/AP/2592

23. Planning consent was granted in May 2017 for the demolition of the existing industrial units and erection of buildings up to 7 storeys in height comprising 15 industrial units with B8 and ancillary A1 use at ground floor level and 59 residential units on upper

levels with associated landscaping, new access from Spa Road, car and cycle parking.

24. The form of this approved development is similar to that of the proposed scheme in that it is a highly articulated single building in a horseshoe shape, open towards the railway albeit with a podium garden as opposed to a central courtyard and a larger amount of car parking.

#### 17/EQ/0134

25. A pre-application enquiry was received in 2017 from the same applicant, seeking to increase the number of homes and proportion of affordable homes on the site. This pre-application enquiry was the precursor to the current application and the advice given to the applicant by the Council can be summarised as follows:

*The redevelopment of the site to provide new homes, improved commercial space and the ability to realise the aspirations for the low line is supported and the development is acceptable in land use terms. The provision of on-site affordable housing would be welcomed as part of the redevelopment of this site. The building heights and massing are considered to be acceptable in design terms although further information is required in order to determine if the height and massing would be acceptable in amenity terms. Further information is also required in terms of justifying the number of wheelchair parking spaces and information on the servicing strategy. However the broad approach to servicing the development, including the off-street provision, is supported in principle.*

#### **Planning history of adjoining sites**

26. The most relevant recent permissions are those pertaining to the Porters Building and Bolonachi Building which are located to the west and north west of the site respectively.
27. 05/AP/2617 - 89 Spa Road (Bolonachi Building) - Erection of building extending to between 4 and 8 storeys in height to provide 139 new dwellings (38 social rented units, 34 shared ownership units and 72 private units) and 317m<sup>2</sup> of commercial space (use classes A1, A2, and D1), together with the provision of associated car parking, landscaping, infrastructure works and improvements to the existing playground area. GRANTED with Legal Agreement - 13.09.2007.
28. 03/AP/2385 - 122-124 Spa Road (Porters Building) - Outline application for residential development (all matters reserved). The proposal considered was submitted in outline, with all matters reserved for residential development. The indicative plans submitted showed building heights ranging from 4 to 7 storeys and access from Spa Road comprising 115 flats and 11 houses. GRANTED with Legal Agreement - 17.08.2005.
29. 12/AP/0164 - Erection of a building ranging between 4 and 7 storeys in height, comprising 46 residential units, including a housing mix of 11 x 1-bed, 26 x 2-bed, 5 x 3-bed and 4 x 4-bed units, 12 car parking spaces, cycle parking for each unit and associated landscaping. (AMENDED SCHEME: alterations to housing tenure mix (8 affordable rent units proposed) and minor design amendments including timber privacy screening to balcony on south elevation).

GRANTED with Legal Agreement - 30.03.2012.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

30. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use and conformity with the development plan
  - Design, including building heights and impacts on townscape
  - Impact on heritage assets
  - Density
  - Affordable housing
  - Mix of dwellings
  - Wheelchair accessible housing
  - Quality of accommodation
  - Trees and landscaping
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area
  - Transport
  - Flood risk
  - Sustainable development implications
  - Archaeology
  - Planning obligations (S.106 undertaking or agreement)
  - Mayoral and Borough community infrastructure levy (CIL)
  - All other relevant material planning considerations

### **Planning policy**

#### Site designations

- 31.
- Air Quality Management Area (AQMA)
  - Archaeological Priority Zone (APZ)
  - PTAL 3
  - Urban Zone
32. The site does not fall within a conservation area and there are no listed buildings adjoining the site, although the central portion of the viaduct is Grade II listed.

#### National Planning Policy Framework (the Framework) 2019

33. Chapter 2 Achieving sustainable development  
Chapter 5 Delivering a sufficient supply of homes  
Chapter 6 Building a strong, competitive economy  
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

### The London Plan 2016

- 34. Policy 2.5 Sub-regions
  - Policy 3.1 Ensuring equal life chances for all
  - Policy 3.3 Increasing housing supply
  - Policy 3.4 Optimising housing potential
  - Policy 3.5 Quality and design of housing developments
  - Policy 3.6 Children and young people's play and informal recreation facilities
  - Policy 3.7 Large residential developments
  - Policy 3.8 Housing choice
  - Policy 3.9 Mixed and balanced communities
  - Policy 3.13 Negotiating affordable housing on individual private residential and mixed use schemes
  - Policy 3.14 Affordable housing thresholds
  - Policy 4.4 – Managing industrial land and premises
  - 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 5.9 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 5.15 Water use and supplies
  - Policy 5.21 Contaminated land
  - Policy 6.1 Strategic approach (Transport)
  - Policy 6.3 Assessing transport capacity
  - Policy 6.9 Cycling
  - Policy 6.10 Walking
  - Policy 6.12 Road network capacity
  - Policy 6.13 Parking
  - Policy 7.1 Building London's neighbourhoods and communities
  - Policy 7.2 An inclusive environment
  - Policy 7.3 Secured by design
  - 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 noise and enhancing soundscapes
  - Policy 7.21 Trees and woodlands
  - Policy 8.2 Planning obligations
  - Policy 8.3 Community infrastructure levy

### Core Strategy 2011

35. Strategic Targets Policy 1 - Achieving growth  
Strategic Targets Policy 2 - Improving places  
Strategic Policy 1 - Sustainable development  
Strategic Policy 2 - Sustainable transport  
Strategic Policy 5 - Providing new homes  
Strategic Policy 6 - Homes for people on different incomes  
Strategic Policy 7 - Family homes  
Strategic Policy 10 - Jobs and businesses  
Strategic Policy 11 - Open spaces and wildlife  
Strategic Policy 12 - Design and conservation  
Strategic Policy 13 - High environmental standards  
Strategic Policy 14 - Implementation and Delivery

### Southwark Plan 2007 (July) - saved policies

36. The Council's cabinet on 19 March 2013, as required by para 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

Policy 1.1 Access to Employment Opportunities  
Policy 1.4 Employment Sites  
Policy 2.5 Planning Obligations  
Policy 3.2 Protection of Amenity  
Policy 3.3 Sustainability Assessment  
Policy 3.4 Energy Efficiency  
Policy 3.6 Air Quality  
Policy 3.7 Waste Reduction  
Policy 3.9 Water  
Policy 3.11 Efficient Use of Land  
Policy 3.12 Quality in Design  
Policy 3.13 Urban Design  
Policy 3.14 Designing Out Crime  
Policy 3.15 - Conservation of the Historic Environment  
Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites  
Policy 3.19 Archaeology  
Policy 3.28 Biodiversity  
Policy 3.31 Flood Defences  
Policy 4.1 Density of Residential Development  
Policy 4.2 Quality of Residential Development  
Policy 4.3 Mix of Dwellings  
Policy 4.4 Affordable Housing  
Policy 4.5 Wheelchair Affordable Housing  
Policy 5.1 Locating Developments  
Policy 5.2 Transport Impacts

Policy 5.3 Walking and Cycling  
Policy 5.6 Car Parking  
Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired

#### Supplementary Planning Documents

37. Affordable housing SPD (2008) and draft (2011)  
Sustainable design and construction SPD (2009)  
Sustainable transport SPD (2010)  
Residential Design Standards SPD (2011)  
Section 106 planning obligations and community infrastructure levy (CIL) SPD (2015)  
Technical update to the Residential Design Standards SPD (2015)

#### New Southwark Plan

38. 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 London Plan

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

#### **Principle of development**

40. The proposed development would not re-provide the full amount of existing employment floorspace, however the existing employment floorspace is not protected by any of the criteria set out in saved policy 1.4 of the Southwark Plan or policy SP10 of the Core Strategy and as such the principle of releasing the land for alternative suitable uses such as new homes, including affordable homes, is supported in principle.
41. The National Planning Policy Framework (NPPF) was updated in 2019. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out key principles, including a focus on driving and supporting sustainable economic development to deliver homes.
42. The NPPF promotes the delivery of a wide choice of high quality homes, seeks to widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It encourages the effective use of land by reusing land that has been

previously developed and also promotes mixed use developments. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

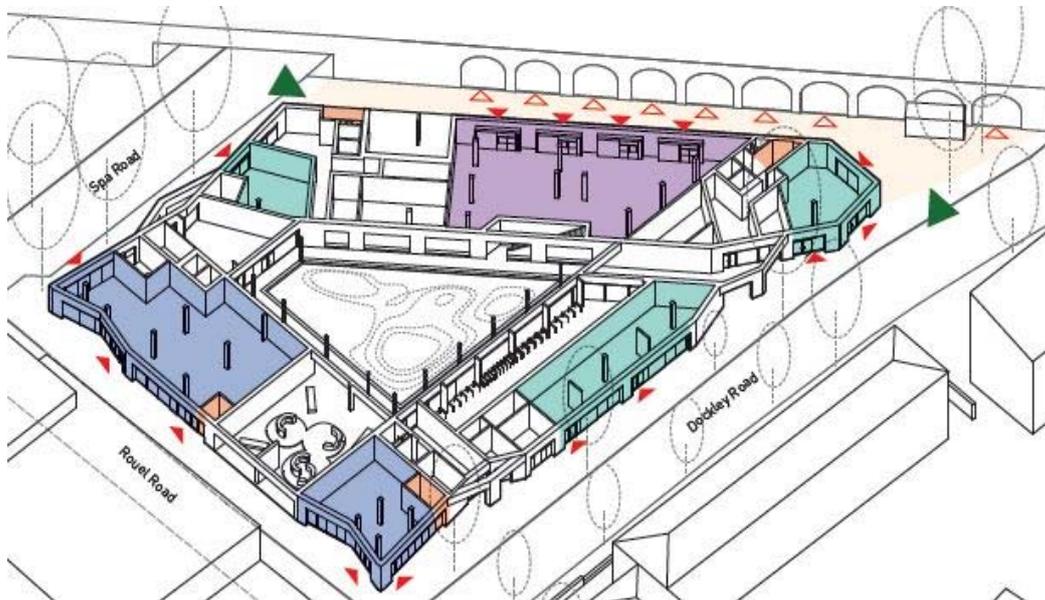
#### *Employment floorspace*

43. Saved Policy 1.4 'Employment sites outside the Preferred Office Locations and Preferred Industrial Locations' of the Southwark Plan sets out a series of criteria to identify sites where employment floorspace must be replaced in full if sites are redeveloped. These criteria include all sites in the CAZ or town centres, and sites which have direct access to a classified road. Where sites do not fall within any of these criteria, the site may be released for other appropriate uses, including housing. Core Strategy policy SP10 'Jobs and Business' continues the same approach. The application site does not fall within any of the locations where employment floorspace is protected by policy, and therefore it is appropriate to release the land for other priority uses. The proposed development would provide 1089sqm of Class B8 and Class A space alongside the housing. This mix is appropriate in terms of activating the street frontages, including the 'Low Line', whilst maximising the delivery of much needed new homes. The proposed employment floorspace would also generate up to 48 new jobs.

#### *Housing*

44. The development would provide 111 new homes, including 30 affordable homes, and 11 affordable homes suitable for wheelchair users.
45. There is a pressing need for housing across London and London Plan Policy 3.3 - Increasing Housing Supply sets a minimum target of 27,362 additional homes to be provided in Southwark over a period from 2015-2025. Strategic Policy 5 of the Core Strategy seeks high quality new homes in attractive environments. It states that development will provide as much housing as possible while also making sure that there is enough land for other types of development. The policy sets a target of 24,450 net new homes between 2011 and 2026. A key objective is to provide as much new housing as possible and create places where people would want to live. The proposal would deliver 111 new residential units including over 35% affordable housing, which is considered to be a positive aspect of the proposal and would make a significant contribution to the borough's housing target.

*Image – Arrangement of ground floor uses*



### *Retail*

46. The development would include five new retail units, three allocated to Class A1 use (retail) and two allocated to Class A3 use (restaurant/café). The retail units would help activate the ground floor of the development and would contribute to the vitality of the area as well as providing services for the increase in population. In its current form, the site has no active frontage and the proposal would create a much more attractive and vibrant street environment with retail opening out onto Dockley Road, Rouel Road and Spa Road. The amount and scale of provision is considered to be acceptable and would help to meet the needs of residents and visitors in the area.

### **Environmental impact assessment**

47. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations.
48. Whilst a formal Screening Opinion was not sought, the development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations 2017 and the European Commission guidance.

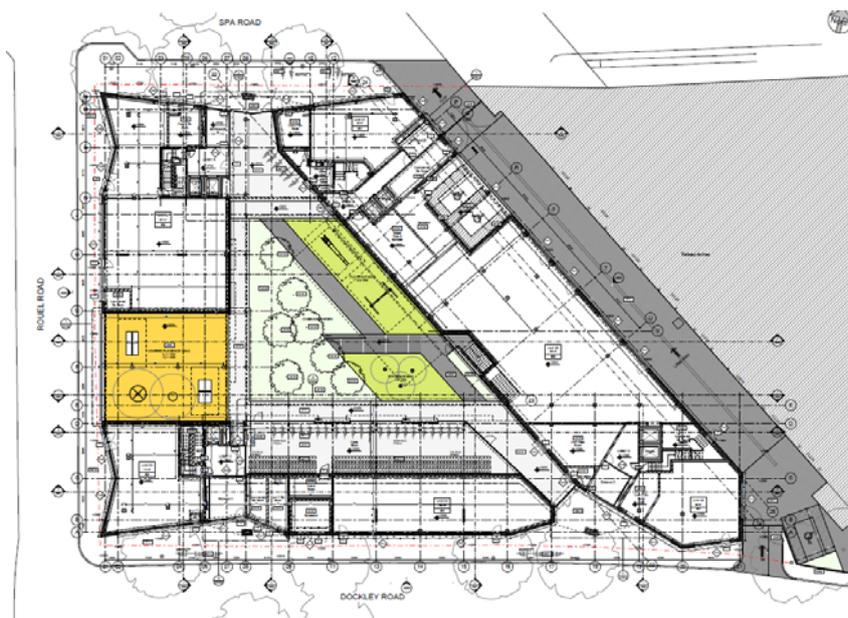
### **Design**

49. Section 12 of the NPPF 'Achieving well-designed places' advises that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development which creates better places in which to live and work. Policy 7.4 of the London Plan requires development to have regard to the form, function, and structure

of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area. Policies 7.4 and 7.5 are also relevant which require developments to provide high quality public realm and architecture.

50. Strategic policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to “*achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.*” Saved policy 3.12 ‘Quality in design’ of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. When we consider the quality of a design we look broadly at the fabric, geometry and function of the proposal as they are bound together in the overall concept for the design. Saved policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape. Saved policy 3.18 of the Southwark Plan requires to the setting of conservation areas, listed buildings and world heritage sites to be preserved.
51. The proposal is located on the southern flank of the railway viaduct and is bounded by Spa Road to the north and Dockley Road to the south. The main street frontage for the site is on Rouel Road to the west. The existing buildings are brick built industrial sheds in two rows that face inwards onto a central service yard with accesses onto Rouel Road and Dockley Road which are secured by metal palisade fencing. The surrounding streets are predominately residential in nature with heights up to seven and eight storeys.

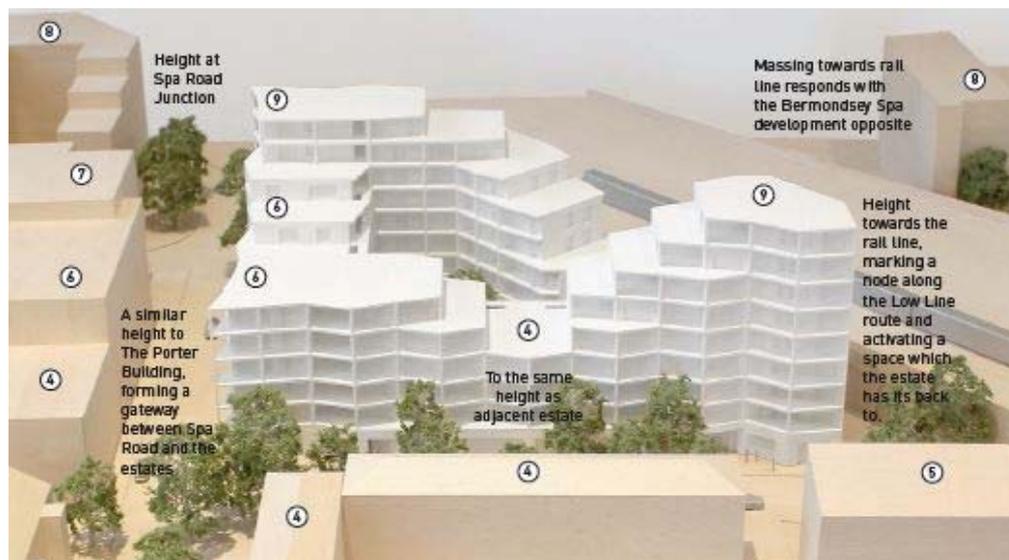
*Image – Proposed site plan*



### *Building form, height and massing*

52. The proposal takes on the form of the previously consented scheme and is arranged in a horseshoe form facing on to the main street frontages to the east, south and west. It is designed to have a robust base with a more lightweight design to the residential accommodation above. The base has retail units animating its edges, with residential entrances at key locations which residents can use to access their homes via the central garden.

### *Image – Building heights*



53. The height ranges from five storeys (19.23m AOD) on Rouel Road and four storeys facing the viaduct (16m AOD) and rises to its maximum height of nine storeys (32.55m AOD) at the opposing south-east and north-west corners. The massing is highly articulated with a stepped arrangement that rises incrementally in single-storey steps which means that above 4-5 storeys each successive floor plate is reduced so that when it reaches the top the scheme has just one or two flats clustered around the core.
54. The form is highly articulated and logical in that it reinforces the street frontages and is arranged around a secure communal garden. The massing mediates between the heights of the older buildings in the area such as Eldridge Court and the higher recent developments such as the Bolonachi Building. The tallest points are located at opposing corners - nearest the railway viaduct and at the corner of Rouel Road and Dockley Road - where the urban context and environmental conditions suggest height is appropriate. Whilst this building would be the tallest in its immediate context, its complex form, and the limited extent of these taller elements means that it will not feel over-bearing.

### *Architectural design*

55. The architectural language of this proposal is intricate and makes some reference to the industrial heritage of the area. The base is proposed to be in a dark masonry finish (black engineering brick), with angled elements lightened and animated by the glazed

openings of the commercial units and residential cores. One opening, onto Rouel Road, is wider and contains the covered play area for older children. At the centre is a landscaped communal courtyard which will provide a communal and visual amenity for residents. Above the base is the highly articulated metal framed (and metal finished) residential block. The apartments are designed with a 'saw-tooth' profile with deep-set angled balconies and an exposed structural grid of steel. This architectural device articulates the block and brings depth and animation to the entire street-facing facade. Chamfered frontages also help to minimise overlooking and offer added privacy to the residents. The upper floors are clad in a profiled metal face which is robust and dynamic.

*Image – View from Rouel Road*



56. The composition is highly articulated within an ordered framework defined by the structural grid and saw-tooth facade. The stepped massing is logical and gives the design a sculptured profile, adjusting in response to its immediate context - lower on Rouel Road, and taller at the prominent corners. Lift overruns are minimised and accommodated within the building.

*Image – Balcony detail*



*Heritage assets*

57. The Council's policies echo the requirements of the NPPF in respect of heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm. Where there is harm to a heritage asset the NPPF requires the Council to ascertain the scale and degree of the harm caused and to balance that against the public benefits arising as a consequence of the proposal.
58. The site is not located in a conservation area and the nearest heritage asset is the Grade II Listed Spa Road railway bridge. The historic railway bridge is set at the middle of the railway viaduct where it is flanked by modern viaduct widening schemes that have added three lines on either side of the historic railway bridge. This proposal is unlikely to have any impact on the setting of this heritage asset given how deep set it is within the viaduct and its limited visibility from within the viaduct itself. The proposal will have no impact on the setting of any other designated heritage asset. The viaduct itself has been considered as an undesignated heritage asset given its scale and elegant detailing. The proposal is separated from the currently occupied portion of the viaduct by the roadway that serves these premises. In this way it preserves the viaduct and its setting.

*Conclusions on design*

59. In conclusion, the proposal is appropriate in its urban form and architectural design. It has no impact on heritage assets and responds appropriately to local character and history. The high quality design will rely to a large degree on the architectural detailing and the choice of materials, in particular the profiled metal cladding and the detailing around window and door openings, parapets, jambs and cills. It is recommended that these details be secured by conditions, as set out in the draft decision notice.

60.

**Density**

61. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site is located within the Urban Zone, a density range of 200-700 habitable rooms per hectare would be sought. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
62. The development as a whole would have a density of 1,082 habitable rooms per hectare. Since the maximum upper limit would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then it's considered that the high density would not in itself raise any issues to warrant withholding permission.
63. The Council's Residential Design Standards SPD requires accommodation to be of an exemplary standard where density ranges would be exceeded. The requirements to be considered exemplary are set out below:

<b>Exemplary residential design criteria from Southwark Residential Design Standards SPD</b>	<b>Commentary</b>
Provide for bulk storage	Each of the apartments proposed would have storage, broadly in compliance with the Residential Design Standards SPD. No bulk storage is provided as the development does not incorporate any basement space.
Exceed minimum privacy distances	Minimum privacy distances would be exceeded in relation to existing neighbours. Some limited instances of lesser distances across the courtyard are mitigated by design and internal layouts.
Good sunlight and daylight standards	Good sunlight and daylight standards would be achieved.
Exceed minimum ceiling heights of 2.3m	All residential ceiling heights would significantly exceed 2.3m.
Exceed amenity space standards (both private and communal)	The proposed amenity space is set out in detail further below. Whilst there would be a small shortfall on some private amenity spaces, this is restricted to the one and to bedroom units and would be compensated by the significant areas of communal amenity space that would be provided that significantly exceed the SPD requirements.

Secure by Design certification	The scheme should achieve Secure by Design accreditation. Conditions to require this are recommended.
No more than 5% studio flats	No studio apartments are being provided.
Maximise the potential of the site	The potential of the site would be maximised, providing mixed use development with new retail and affordable homes.
Include a minimum 10% of units that are suitable for wheelchair users	10% of the proposed units would be suitable for wheelchair users.
Have excellent accessibility within buildings	The accessibility within the buildings would be excellent.
Have exceptional environmental performance	The environmental performance would be fully policy compliant, taking into account a contribution to the Southwark Green Fund.
Minimise noise nuisance between flats by stacking floors so that bedrooms are above bedrooms, lounges above lounges	Accommodation is generally stacked to minimise disturbance and noise transfer will be further mitigated by condition.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context, character and communities in terms of its quality of design and regeneration benefits including affordable housing, retail and Class B8 space as well as opening up a new section of the low line at weekends.
Include a predominance of dual aspect units	Over 99% of the proposed units would be dual aspect (only 1 single aspect flat)
Have natural light and ventilation in all kitchens and bathrooms	The vast majority of kitchens would have access to natural light and ventilation.
At least 60% of units contain two or more bedrooms	60% of the total number of units across all tenures would have two or more bedrooms.
Significantly exceed the minimum floor space standards	All units would meet the space standards, and many would exceed them, some to a significant degree.
Minimise corridor lengths by having additional cores	This has been achieved through having four separate cores to serve the new homes.

64. In addition, officers have identified the following exceptional aspects of the residential design:

- Exceptional architectural design, with high quality materials proposed;
- Large, functional balconies and expansive communal amenity spaces;
- Tenure blind design;
- Choice of layouts, with some open plan and others with separate kitchen diners and living rooms;
- Full provision of on site play space.

65. Officers consider that the new homes would be of an exemplary standard despite not all of the requirements in the above table being met in their entirety. It is considered that the proposal would be of an appropriate height, scale and massing and the quantum of development would allow the provision of affordable housing to be maximised. Although there would be adverse impacts upon daylight and sunlight to neighbouring properties, this must be weighed in the balance with all of the benefits arising from the scheme. When all of the benefits and disbenefits are taken into account, it is not considered that exceeding the density threshold would warrant withholding permission in this instance.

### **Affordable housing**

66. The development would provide 35% affordable housing, equating to 30 flats, once the dispensation for wheelchair affordable housing has been taken into account.
67. Section 5 of the NPPF sets out the government's approach to the delivery of significant new housing including a plan-led approach based on a sound evidence base, and policy 3.3 of the London Plan supports the provision of a range of housing types. It sets the borough a minimum target of 27,362 new homes between 2015-2025. Strategic policy 5 of the Core Strategy reinforces the London Plan policy, and requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. Core Strategy SP6 requires that developments with 10 or more units should provide a minimum of 35% affordable housing, subject to viability. Saved policy 4.4 of the Southwark Plan requires an affordable housing tenure split of 70% social rented and 30% intermediate units in this location.
68. The proposed development would provide a total of 369 habitable rooms. As such, the 35% affordable housing requirement for this site would be 129 habitable rooms. Saved Policy 4.5 'Wheelchair affordable housing' of the Southwark Plan allows for one less habitable room of affordable housing to be provided for every one affordable wheelchair unit provided in a development. In this case, as the developer is providing 11 affordable homes suitable for wheelchair users, the overall affordable habitable room requirement is reduced to 118.
69. The proposed development would deliver a policy compliant level of affordable housing comprising 120 affordable habitable rooms which equates to 35.5% with a tenure split of 70% social rented and 30% intermediate (shared ownership). The mix of affordable units would be as follows:

<b>Unit Type</b>	<b>Private Units</b>	<b>Affordable Housing Units</b>		<b>Total</b>
		<b>Social Rent</b>	<b>Shared Ownership</b>	
<b>1 Bed</b>	36	5	3	44
<b>2 Bed</b>	34	6	5	45
<b>3 Bed</b>	11	9	2	22
<b>Total Units</b>	81	20	10	111
<b>Total Hab Rooms</b>	249	84	36	369

70. It is noted that 37% of the affordable housing units would be three bedroom family units and overall, 74% of the affordable housing would have two or more bedrooms. This is welcomed and the scheme is considered to offer a wide choice of affordable

homes.

### *Viability*

71. The application is accompanied by a viability appraisal which has been independently reviewed by GVA (now Avison Young) on behalf of the Council. The proposed affordable housing offer would be policy compliant and this is demonstrated as being viable in the Financial Viability Appraisal submitted with the application. The delivery of the affordable housing would be secured within the S106.

### **Housing mix**

72. Strategic Policy 7 of the Core Strategy expects developments to provide at least 60% two or more bedrooms and in this at least 20% of units to have 3 or more bedrooms. At least 10% of the units should be suitable for wheelchair users. The proposed housing mix is detailed below.

<b>No of Bedrooms</b>	<b>Total Units (number)</b>	<b>Total Units (%)</b>
1 Bed	44	40%
2 Bed	45	40%
3 Bed	22	20%
Total	111	

73. The proposed housing mix is fully compliant with policy and would offer a range of homes and unit sizes, including a policy compliant level of family sized housing which is fully supported.

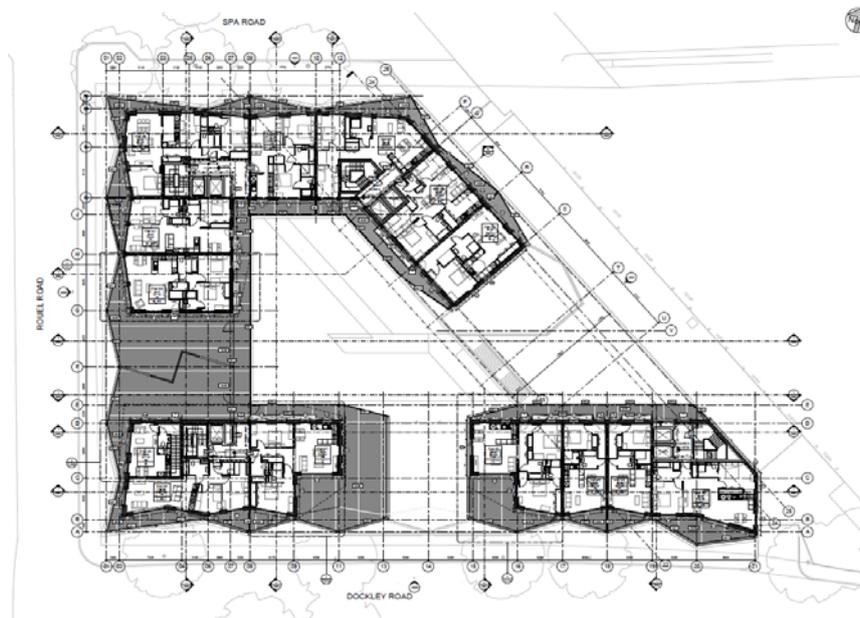
### **Wheelchair housing**

74. A total of 11 units would be provided that would be suitable for wheelchair users. All 11 of these would be affordable units. This meets the policy requirement of 10%. The exact units and level of fit out would be secured within the S106 agreement alongside a clawback mechanism to secure £100,000 for any affordable wheelchair unit that is not fully fitted out for occupation by a wheelchair user.

### **Housing quality**

75. Policy 3.5 of the London Plan requires housing developments to be of the highest quality internally, externally, and in relation to their context and to the wider environment. They should enhance the quality of local places, incorporate requirements for accessibility and adaptability, and minimum space standards. In terms of Southwark policy, saved policy 4.2 of the Southwark Plan 'Quality of accommodation' requires developments to achieve good quality living conditions. The Council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels, and units should be dual aspect to allow for good levels of light, outlook and cross-ventilation.

Image – Level 5



*Unit size*

- 76. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 (including 2015 Technical Update).
- 77. The following table sets out the minimum flat size requirements as set out in the Residential Design Standards 2011, and also the flat sizes that would be achieved.

<b>Unit Type</b>	<b>SPD (sqm)</b>	<b>Size Range (sqm)</b>
1 Bed (flat)	50	50 – 66
2 Bed (flat)	61-70	70– 89
3 Bed (flat)	74-95	76 - 130

- 78. The proposed flat sizes meet and in many cases significantly exceed the minimum space standards as set out in the SPD which is welcomed and will provide an excellent standard of accommodation.

*Aspect*

- 79. 110 of the 111 units (over 99%) would be dual aspect and the one unit that would be single aspect would be orientated south/south east. This is an exemplary proportion of dual aspect units for a high density scheme.

*Overlooking*

- 80. Separation distances vary from between 17.5 metres and 26 metres across the courtyard however there is one instance of a separation distance of 11.5 metres at the inward facing units towards the railway end of the development. The closer distance of

11.5 metres only affects bedrooms and kitchens. Where other distances are less than the expected 21 metres, the splayed layout means that views are oblique which mitigates against intrusive overlooking. Overall, the separation distances are not considered to be significantly detrimental to amenity or the quality of the accommodation.

#### *Internal daylight*

81. A Daylight Assessment based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or day lit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.
82. Of the 332 rooms tested 234 (70%) would fully comply with the BRE guidance in relation to ADF. Of the 98 rooms that fall short of this target, 76 would be bedrooms or dining rooms and 40 rooms would be within 0.3% of meeting the target. Officers consider the shortfalls to be minor and would generally affect rooms that are less sensitive to daylight. Overall the proposed units would be well lit by natural light.

#### *Amenity space*

83. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10 sqm per child bed space (covering a range of age groups).
84. In terms of the overall amount of amenity space required, the following would need to be provided:
  - For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD;
  - For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal gardens;
  - 50sqm communal amenity space per block as required by the SPD; and
  - 10sqm of children's play space for every child space in the development as required by the London Plan.
85. All of the dwellings would have private amenity space with the three bedroom units either meeting or exceeding the minimum standards. 47 of the one and two bedroom units would fall below the 10sqm requirement but would still have in excess of 7sqm private amenity space. Overall the shortfalls on the one and two bedroom units is minor, equating to 96.5sqm overall which would be comfortably accommodated within the communal amenity space.

*Image – Internal courtyard*



86. Communal amenity space totalling 1018sqm would be provided in the form of a central courtyard and two roof terraces. This is more than enough to absorb the small private amenity shortfall of 96.5sqm and the large communal amenity spaces are a significant benefit of the scheme. The level of both private and communal amenity space is welcomed and is considered to be policy compliant.

*Children's play space*

87. In line with the Mayor's 'Providing for Children and Young People's Play and Informal Recreation' SPG the development would be required to provide 330sqm of children's play space broken down between the various age groups as detailed below.
88. The applicant has proposed 331sqm of child play space against the following child play space requirement:

<b>Age Group</b>	<b>Play Space Requirement</b>	<b>Play Space Provided</b>
Under 5	150	151
5 to 11	110	110
12+	70	70
<b>Total</b>	<b>330</b>	<b>331</b>

89. The play space will all be accommodated within the ground floor central courtyard which is well overlooked by the flats above ensuring that children can be supervised whilst playing outside. The 5-11 and 12+ play is located in the covered area between the courtyard and Rouel Road and a benefit of this is that it can be used in all weathers. The provision of equipment such as table tennis tables in this shaded area is a positive response to meeting the needs of older children. Officers welcome the fully compliant levels of play space being provided entirely on site. Play equipment in the form of swings, slides, roundabouts and table tennis tables will ensure that all age groups are catered for with final details of play equipment to be secured by condition.

### Conclusions on housing quality

90. The proposed development would provide a policy compliant mix of homes all of which would meet or exceed the minimum space standards. All of the new homes would be well lit and ventilated with natural light and air and future occupiers would benefit from high quality private and communal amenity space alongside high quality and secure play spaces for children of all age groups. Officers consider the proposed accommodation to be of a high standard and a very positive aspect of the proposed development.

### **Impact of adjoining and nearby uses on occupiers and users of proposed development**

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

### *Privacy and overlooking*

92. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. All outward facing elevations of the proposed development would achieve at least 12 metres separation distance from adjacent buildings and in this respect it is not considered that there will be any adverse impact in terms of overlooking, loss of privacy or loss of outlook.

### *Impact of proposed uses*

93. The proposed uses within the development would comprise Class A1, A3 and B8 as well as residential. Class B8 use is already in operation on the site and Class A1 and A3 uses generally sit comfortably near to residential properties, and the scale of the Class A (retail) uses would not result in any significant loss of amenity. It is recommended that the opening hours of the Class A1, A3 and B8 uses be limited to 7am to 11pm daily by way of a condition. Conditions are also recommended limiting servicing hours and plant noise from the development.

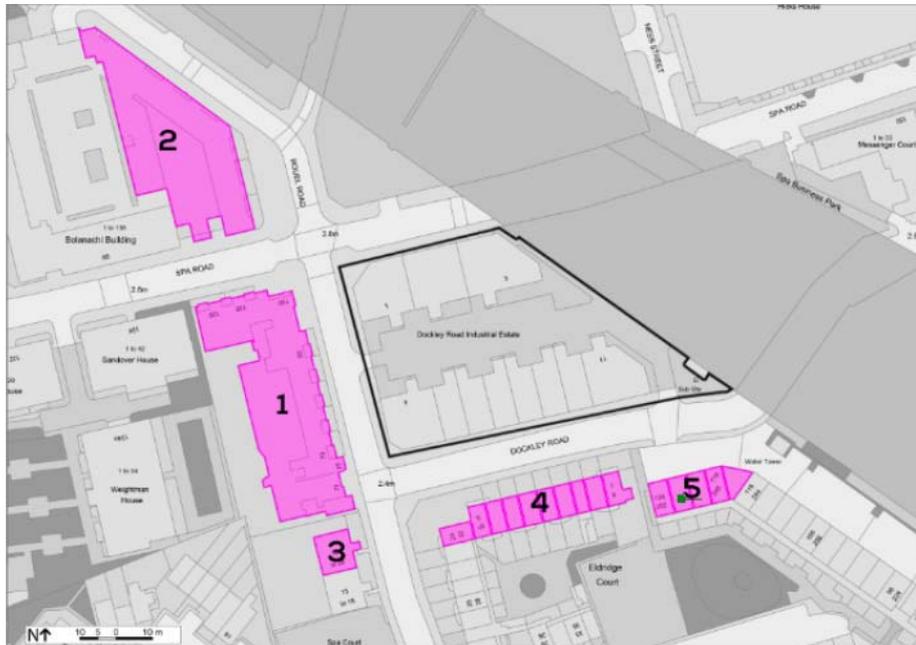
### *Daylight and sunlight*

94. A daylight and sunlight report has been submitted that assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
95. The existing buildings that surround the application site currently have unobstructed views across the application site due to the low rise nature of the existing buildings and as such receive unusually high levels of daylight and sunlight for an urban location. As such any redevelopment of the site would result in noticeable changes to

daylight to adjacent properties.

96. In this case there would be significant impacts to both the Porter Building and Eldridge Court. However, taking into account the existing context in the form of a 'mirror image' assessment for the Porter Building and a comparison of the impacts between the consented scheme and the proposed scheme for Eldridge Court, Officers are of the view that whilst the impacts would be significant, they would not be inappropriate. The Council have had the applicant's Daylight and Sunlight assessment independently reviewed and the Council's consultants (GVA) agreed with the conclusions of the applicant's report. It is noted that an updated Daylight and Sunlight Assessment has been submitted and as this updated assessment shows improved results it was not considered necessary to have the document reviewed externally.
97. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within an area of modern high rise buildings, a higher degree of obstruction may be unavoidable if new buildings are to match the height and proportion of existing buildings.
98. The BRE sets out two detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
99. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible at the working plane, 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.
100. The daylight and sunlight assessment submitted by the applicant considers the impact of the development against the following buildings in residential use:
  - Porter Building
  - Bolonachi Building
  - 19-24 Spa Court (79 Rouel Road)
  - 1-16 Eldridge Court
  - 118-124 and 246-252 Lucey Way

Image – Site (outlined in black) and surrounding properties



1. 126 Spa Road (Porter Building)
2. Bolanachi Road
3. 19-24 Spa Court (79 Rouel Road)
4. 1-16 Eldridge Court and
5. 118-124 & 246-252 Lucey Way

101. The daylight and sunlight assessment demonstrates that there would be no adverse impacts beyond the BRE guidance on either the Bolonachi Building or Spa Court. The remaining buildings will be taken in turn.

*Porter Building*

102. The Porter building sits directly opposite the application site on Rouel Road and rises to seven storeys (with the top floor slightly set back). The flats on the Rouel Road frontage are served by deep inset balconies. Three tests have been undertaken to gauge the impact of the development on the Vertical Sky Component (VSC) levels that would be achieved at the flats in the Porter building including :

- Existing V. Proposed
- Porter Building with balconies removed V. Proposed
- Mirror image massing of Porter Building V. proposed.

103. The results of the various tests on the Porter Building are set out in the following table:

	No. of windows assessed	* BRE Compliant	20.01% - 30% loss	30.01% - 40% loss	40.01% - 50% loss	50.01% - 60 % loss	> 60.01% loss
Existing V. Proposed	103	41 (39.8%)	13	12	15	12	16
Balconies removed	103	51	18	14	18	15	0

V. Proposed		(49.5%)					
Mirror massing V. Proposed	103	94 (91.2%)	8	1	0	0	0

\* less than 20% reduction in VSC or retains at least 27% VSC

*Existing V. Proposed*

104. The daylight assessment has assessed 103 windows serving 69 rooms. The Porter Building would experience substantial impacts as a result of the proposed development with 62 of 103 windows (60%) experiencing a loss of VSC beyond the 20% threshold and a reduction to below 27% VSC as set out in the BRE. There are instance where these changes would be significant when considering the percentage change however this is largely a result of low existing VSC levels which can result in a disproportionate percentage change.
105. In terms of NSL, 25 of the 69 rooms (36%) would see reductions in sky visibility beyond the 20% threshold.

*Balconies removed V. Proposed*

106. As set out above, the flats in the Porter Building which face Rouel Road frontage are served by deep inset balconies. This style of balcony is more enclosed than a projecting balcony and this in turn can restrict the ability of windows within this space to receive natural light, particularly light from above. As set out in the BRE guide, it is reasonable to undertake an assessment without the balconies in place. In the case of a projecting balcony, the simplest form of the test would be to remove the balcony from the daylight model. However, as the balconies at the Porter Building are inset, the point of calculation has been moved to the façade of the building, thereby removing the overhead and side obstructions of the inset balconies.
107. The VSC results demonstrate that the windows located within the inset balconies would receive low levels of VSC with the proposed development in place and in many cases this would be less than 10% VSC. In the scenario where the inset balconies are removed, the same windows would retain VSC levels of at least 15%. Overall, 49.5% of windows would remain BRE compliant in this scenario.

*Mirror image V. Proposed*

108. In situations where the existing buildings on site do not align with the surrounding context in terms of scale, massing and position then disproportionate reductions in daylight and sunlight can occur. This is because the neighbouring building would have high levels of daylight and sunlight that are not typical of the existing townscape and context. In these situations the BRE provide for an alternative assessment and this is known as a mirror image test.
109. The Dockley Road application site is untypical of the surrounding context and townscape in that is occupied by low rise buildings, whilst neighbouring blocks reach up to seven or eight storeys in height. This results in a higher than typical level of daylight and sunlight to the neighbouring blocks when taking into account the general

scale and massing of the surrounding townscape.

110. The BRE advocates an approach, in such instances, that sets an alternative baseline target of VSC for the proposed development to meet. This baseline target is set by mirroring the neighbouring properties on the application site. A more accurate way of understanding the equivalent VSC value for each individual window is to undertake a quantitative daylight and sunlight analysis with the mirror image of the opposite building in the existing baseline condition.

*Image – Mirror massing of Porter Building*



111. The Porter Building sits very close to the boundary on Rouel Road and as set out in the BRE it is reasonable to conduct a 'mirror image' assessment which is used to understand the levels of daylight (VSC) that would be experienced by an existing neighbouring property if there were a building of the same height, massing and positioning opposite.

112. A 'mirror image' assessment has therefore been completed that quantifies the impact on the Porter Building using a mirror image of the Porter Building on the application site to set the alternative baseline condition. If the existing baseline for the Porter Building is set by the mirror image of the Porter Building on the application site, then the proposed development would result in only 9 of the 103 windows (8.7%) experiencing a loss of VSC beyond the BRE guidance and in many cases, the VSC results would improve under the proposed development as compared to the baseline 'mirror image'. Similar results are seen under NSL whereby only 4 of the 69 rooms that have been assessed (3.8%) would experience a 20% reduction under the proposed development using the mirror image as the baseline.
113. The results of the daylight and sunlight assessment demonstrate that there would be a significant impact on the Porter Building in terms of a loss of daylight. When giving consideration to the tests removing the obstructive balconies and the mirror image as set out under the BRE guidance, the VSC and NSL impacts on the Porter Building are considered acceptable on balance, taking into account the significant benefits of the scheme in terms of affordable housing provision, quality of accommodation, quality of play space and exceptional design.
114. In terms of sunlight, all but three rooms would remain BRE compliant and the three rooms that would be affected are bedrooms which are less sensitive to sunlight loss given their use. The retained total values for these rooms are between 24% and 25% which is only marginally short of the BRE target of 25%.

#### *Eldridge Court*

115. A total of 66 windows and rooms at Eldridge Court have been assessed for both VSC and NSL. When comparing the existing baseline versus the proposed development there would be 58 windows (88%) that would experience losses of more than 20% VSC and 33 rooms (50%) that would see at least a 20% reduction in NSL (area of the room where the sky is visible).
116. Of the 58 windows that would see reductions of more than 20% VSC, a total of 22 would retain VSC levels of between 20% and 25%; 23 would retain VSC levels of between 15% and 20% and 16 would retain VSC levels of between 10% and 15%. There would be a total of 5 windows with VSC levels below 10%. All of the windows that retain less than 15% VSC are compromised by obstructions that are part of the existing Eldridge Court building, including the significantly projecting eaves and the two projecting bays on the Dockley Road frontage. The majority of windows (79%) would continue to receive VSC levels in excess of 15% which is not untypical of urban areas.

#### *118-124 and 246-252 Lucey Way*

117. A total of 12 windows and rooms have been assessed for both VSC and NSL and whilst 50% of the windows and 25% of the rooms would experience reductions in VSC and NSL beyond the BRE guidance it should be noted that all windows would retain VSC levels of at least 22% and in many cases would exceed 24% which is very positive for a site in an urban area.

#### *Conclusions on daylight and sunlight*

118. The proposed development would have a significant impact on the Porter Building and Eldridge Court. In the case of the Porter Building, if the mirror image was adopted as an alternative target value, as allowed for in the BRE, then the proposed development can be shown to have an acceptable alteration in daylight. When considering Eldridge Court, the residual VSC levels are not untypical of urban areas and the proposed development would not be significantly different to the consented scheme in terms of the level of impact. So whilst there will be significant impacts beyond the 20% advocated in the BRE Guidelines and some of these are likely to be noticeable, the extent of change is not unusual in dense urban locations particularly where the height of the existing buildings on the site is so modest. The impacts identified in the Daylight and Sunlight report should be considered against wider policy context which encourages the more intensive use of brown field sites and the overall benefits of the proposal including the provision of high quality affordable housing, affordable family units within a well-designed building

### **Transport issues**

119. The NPPF states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
120. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved Policy 5.1 of the Southwark Plan states that major developments generating a significant number of trips should be located near transport nodes. Saved Policy 5.2 advises that planning permission will be granted for development unless there is an adverse impact on transport networks; and/or adequate provision has not been made for servicing, circulation and access; and /or consideration has not been given to impacts of the development on the bus priority network and the Transport for London (TfL) road network.

### *Site context*

121. Pedestrian routes around this site connect easterly to Bermondsey Underground Station (Jubilee line) and the bus routes on Jamaica Road and southerly to the buses and shops on Southwark Park Road. In the northbound direction, these routes also join with the "Thames Path" riverside walkway. In the Eastbound direction the site is connected with Southwark Park. The existing Cycle Route Quietway 1 (Greenwich to Waterloo) on Willow Walk can easily be reached via Spa Road/Bacon Grove. A quietway (Abbey Street Quietway -Tower Bridge to Lower Road) is proposed (but not yet committed) through Dockley Road. There are pedestrian crossing facilities along the route to Bermondsey Underground Station in the form of a raised zebra crossing on St James's Road and signalized crossings at the St James's Road/Jamaica Road junction.

### *Site layout*

122. In site layout terms, the proposed building is similar to the consented scheme. The proposed development is set back slightly from Dockley Road and Spa Road to improve the current narrow footways on these roads. It is also proposed to open the Low Line pedestrian route (which is currently a closed service yard) along the adjacent railway line for weekend retail operation of the railway arches businesses.

The redundant vehicle crossover on Rouel Road will be removed and the pavement reinstated. The existing vehicle crossover on Dockley Road will be retained as the vehicle entrance to the proposed development with a new egress gate and crossover on Spa Road to create a one-way servicing route along the railway arches. To incorporate the new crossover and ensure that adequate visibility is provided, a 20m length of resident permit holder / pay and display parking bays on the southern side of Spa Road will be removed and relocated to the northern end of Rouel Road. One additional bay will be provided on the southern side of Spa Road, to the west of the new vehicle crossover.

#### *Car parking*

123. The site is located on the edge of but not within the GR Controlled Parking Zone (CPZ) with parking permitted for Resident Permit Holders (RPH) only from Monday to Friday between 08:00hrs and– 18:30hrs. The applicant proposes three disabled car parking spaces and no general needs parking.
124. Although the applicant has not proposed any car parking provision, the parking stress surveys that were undertaken on Wednesday 8 November and Thursday 9 November 2017 along the immediate road sections within 200metres walking distance of the Site between 00:30hrs and 05:30hrs have shown an average parking stress in the CPZ area of 74% while outside the CPZ area the parking stress is 98%.
125. A new CPZ proposal in the eastern side of the site (Thorburn Square CPZ) was supported by 53% of residents and subsequently recommended by the council. The introduction of the new CPZ will help to control overspill parking and occupiers of the development will not be eligible for any parking permits in either existing or future CPZs.
126. The number of disabled parking spaces is less than that recommended by the London Plan. However, due to site constraints it has been agreed that the proportion would be reduced from 10% to 3%. Nevertheless at least one car club bay will be required and this will be secured as part of the S106 Agreement.

#### *Cycle parking*

127. The applicant has proposed a residential cycle storage containing 176 cycle parking spaces, which is enclosed, secure and weatherproof and located in an accessible area at ground floor next to the central courtyard and is therefore compliant the adopted 2016 London Plan/NSP. However further detail is required on the type, number and location of the long stay cycle parking for the commercial units and this will be secured by condition.

#### *Servicing*

128. The applicant proposes that all residential and commercial waste will be collected on-street or along the service road. The bin stores have all been located within 10m of the proposed collection point. This is considered acceptable however a condition will be required to ensure that no doors open out over the highway as is standard.
129. Servicing of the development will occur via the existing service road which runs between the proposed development and the railway viaduct. A servicing bay would be

provided on the western side of the service road, designed to accommodate a 10m rigid vehicle. It is proposed that the commercial aspect of this development will be serviced via this route, which will be kept free from obstructions to ensure that loading can occur whilst vehicle circulation along the route is maintained. Residential servicing will also take place along this service route, which will be linked to the residential courtyard via two cores at either end of the route. In addition to the service road within the development, some on-street servicing and refuse collection activity is likely on Dockley Road and Spa Road adjacent to each of the small commercial units proposed. All tenants will be expected to manage their servicing requirements and to co-ordinate with the on-site management team to ensure that demand for the loading bay is managed efficiently. The on-site management team will seek to ensure that no more than one delivery is scheduled for the loading bay at any one time. A Service Management Plan will be required by condition and this will secure all details of servicing and set out the times within which servicing can take place.

### *Traffic*

130. Officers consider that vehicle trips would increase as a result of the proposed development. Overall, the Transport Team have estimated that this development proposal would produce 22 and 49 vehicle movements in the morning and evening peak hours respectively. It is also forecast that the existing light industrial use of this site would have generated 16 and 11 vehicle movements in the morning and evening peak hours respectively meaning that the actual net additional vehicle movements resulting from this development would be 6 and 38 vehicle movements in the morning and evening peak hours respectively. Although these predicted vehicular trips are higher than those of the applicant's consultants, the Transport Team consider that these levels of vehicular traffic would not have any significant adverse impact on the prevailing vehicle movements or traffic at this location.

### **Impact on trees**

131. The site is bordered by large street trees. The trees presently overhang the existing buildings to a significant degree and have resulted in parts of the highway buckling due to surfacing roots. It is acknowledged that the trees will likely need to be pruned however this is not considered to be a negative impact in and of itself. Tree protection measures will be required to demonstrate how the existing trees will be protected, how their root systems can be managed and the extent of any pruning work that may be required. This will be secured as a pre-commencement condition to ensure that the trees would not be put at risk as a result of the development. Further conditions will be imposed to secure high quality hard and soft landscaping for the communal amenity spaces as well as conditions to secure green roofs and some planting within the service route/low line.

### **Archaeology**

132. Policy 7.8 of the London Plan advises that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. Saved policy 3.19 of the Southwark Plan is also relevant, which sets out the Council's approach to protecting and preserving archaeology within

the borough.

133. The application site is not located within a designated Archaeological Priority Zone (APZ), however, it is close to two existing APZs. Significant multi-phase archaeological remains have been discovered in the general area from a number of sites. For example, ditches dating to the late Iron Age and early Roman periods were found during an evaluation by Museum of London Archaeology at 150 Spa Road between June and July 2010, just the other side of the railway. Roman ditches were also found during an excavation by AOC Archaeology at Spa Road between November 2007 and August 2008 just to the west of the site, and post medieval features and the remains of a 19th century tannery were also found.
134. Evaluation trenches excavated by the Museum of London Archaeology Service during September 2008 just to the north of the site revealed a range of Post Medieval cut features sealed beneath later levels of material. These features included shallow gullies and a substantial (possible field drainage or a boundary) ditch. This feature may potentially relate to English Civil War defences dating from 1642-3, and mapped by Smith and Kelsey.
135. The applicants have submitted an archaeological Desk Based Assessment (DBA) by AOC and dated December 2017 in support of this planning application. The assessment notes that the site has been truncated by previous development impacts. The Council's archaeologist agrees with the findings of this report and there is sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission provided that appropriate conditions regarding archaeological investigation, recording and mitigation are applied to any consent issued.

## **Ecology**

136. Policy 7.19 of the London Plan 'Biodiversity and access to nature' requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity wherever possible. Saved policy 3.28 of the Southwark Plan states that the Local Planning Authority will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, and will require an ecological assessment where relevant. A preliminary ecological appraisal (PEA) has been submitted in support of the application.
137. The preliminary ecological assessment makes recommendations which are supported by the Council's Ecology officer and which will be secured by way of condition, including:
  - A soft landscaping scheme that includes native species and non-native species that are known to benefit wildlife; and
  - The installation of 40mm entrance hole wall-integrated bird boxes on the new buildings, specifically for use by black redstart (*Phoenicurus ochruros*), which is a species of conservation concern known to be present in the SE London area.
138. The PEA also recommended that green walls be incorporated into the private outdoor amenity spaces however the provision of green walls within these locations is not

feasible and instead focus will be on green roofs and planting.

### **Air Quality**

139. The site sits within an air quality management area. Policy 7.14 of the London Plan 'Improving Air Quality' seeks to minimise the impact of development on air quality, and sets requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality. The Council's Environmental Protection Team have reviewed the applicant's Air Quality Impact assessment produced by AECOM and agree with the report's findings and the development would achieve Air Quality Neutral standard for both vehicle and building emissions. Mitigation measures will be required during construction and this will be secured as part of a Construction Environmental Management Plan.

### **Noise**

140. The Environmental Protection Team have reviewed the applicant's Environmental Noise Survey and Noise Impact Assessment Report. In order to meet the Council's noise criteria for internal and external spaces, several mitigating conditions will be required as is standard. These conditions will relate to internal and external noise levels as well as noise transfer and noise from plant.

### **Land contamination**

141. Policy 5.21 of the London Plan advises that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination. The Council's Environmental Protection Team have reviewed the Desk Study and Ground investigation report which did not find any elevated substances that required remediation. As such no further land contamination conditions are required.

### **Flood risk**

142. The application site is located within Flood Zone 3, which is considered to be 'High Risk' but does benefit from the Thames tidal defences. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable. The Environment Agency would also support the recommendation noted within the Flood Risk Assessment subject to conditions and these would be included as a condition on any consent issued.

### **Planning obligations (S.106 undertaking or agreement)**

143. 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

144. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

*S106 obligations*

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

Planning Obligation	Mitigation	Applicant Position
Car Club	Three years membership for all eligible residents.	Agreed
Carbon Offset – Green Fund	£145,215	Agreed
Employment During Construction	17 sustained jobs to unemployed Southwark residents 17 residents trained in pre/post employment short courses. 4 new apprenticeships. Or a payment of £81,650	Agreed
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of planting in which case a contribution will be sought - £6,000 per tree.	Agreed
Admin Charge (2%)	£4,537.	Agreed

146. The S106 Agreement will also secure the following obligations:

- Employment during construction provisions;
- Employment, skills and business support ;
- Delivery of the commercial space before a proportion of the residential space can be occupied;
- Commercial units management plan;
- Provision of affordable housing including a clawback mechanism for any wheelchair units that are not fully fitted out for occupation by wheelchair users;
- Parking permit exemption;
- Affordable housing monitoring fee;
- District heating future proofing provisions;
- Secure opening of low line at weekends;
- Provision of a car club bay and relocation of displaced street permit parking
- Tree contribution of £6K per tree for any proposed tree which cannot be planted on the site or dies within 5 years of the completion of the development;
- Post-construction review of carbon dioxide savings.

147. Highway works which would be delivered through a s278 agreement comprising:

- Provision of a raised table on Dockley Road at the south-eastern end of the site next to the railway underpass to slow vehicles approaching the proposed pedestrian/vehicular access;
- A raised pedestrian crossing at the western side of the retained delivery access on Dockley Road;
- Removal of the bollards currently cluttering the footway on Rouel Road;
- Repaving of the footway around the development on Rouel Road, Dockley Road, and Spa Road using materials in accordance with Southwark's Streetscape Design Manual (concrete paving slabs and granite kerbs);
- Provision of vehicle crossovers on Spa Road and Dockley Road to be constructed/upgraded to the relevant SSDM standards;
- Redundant crossover on Rouel Road to be reinstated as footway;
- Upgrade the crossing point on the northern side of Rouel Road where it meets Spa Road to current SSDM standards including tactile paving on the full width of the crossing;
- Dropped kerb provisions around the development to be provided to SSDM standards;
- Promote a TRO to amend parking arrangements on Spa Road;
- Relocate the existing lamp columns on Rouel and Dockley Road to the back of footway;
- Replace any gully covers and paving blocks damaged during construction works;
- The Highway Authority wishes to adopt the strip of land (between the public highway and the proposed building line around the development) which currently does not form part of the public highway as publicly maintained. Footway width of at least 1.5m will then be achieved behind the bases of the existing mature trees especially on Dockley Road.

148. In the event that a satisfactory legal agreement has not been entered into by 31 August 2019 it is recommended that the Director of Planning be authorised to refuse planning permission, if appropriate, for the following reason:

The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2016) and the Planning Obligations and Community Infrastructure Levy SPD (2015).

### **Community Infrastructure Levy (CIL)**

149. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. While Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance an estimated

Mayoral CIL payment of £304,360 and an estimated Southwark CIL payment of £2,061,626 are payable.

### **Sustainable development implications**

150. The London Plan Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy Be lean: use less energy; Be clean: supply energy efficiently; Be green: use renewable energy. This policy requires development to have a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013 as specified in Mayor's Sustainable Design and Construction SPG.
151. Policy 5.3 states that developments should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. Within the framework of the energy hierarchy major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
152. Strategic Policy 13 of Core Strategy states that development will help us live and work in a way that respects the limits of the planet's natural resources, reduces pollution and damage to the environment and helps us adapt to climate change.
153. The applicants have submitted a Sustainability Statement and Energy Assessment which seeks to demonstrate compliance with the above policy.

#### *Energy*

154. An energy statement has been submitted which provides an initial assessment of the energy demand and carbon dioxide (CO<sub>2</sub>) emissions and savings associated with the proposed development. The applicant proposes to use a range of 'be lean, be clean and be green' measures in order to achieve the required carbon reduction as set out below:

#### *Be Lean*

155. The relevant Be lean measures would generate a CO<sub>2</sub> saving of 9.82%:
  - The specification of high performance building fabric, airtightness and thermal bridging to reduce winter heat loss will reduce the scheme's required heating energy.
  - Mechanical ventilation with heat recovery to each flat to reduce the heating energy demand.

#### *Be Clean*

156. The relevant Be clean measures would generate a CO<sub>2</sub> saving of 23.86%:
  - In accordance with the London Plan and Southwark local planning policy, the new buildings connected to a site wide district heating network and central heat generating energy centre.

- A central CHP unit sized to provide around 20% of the housing's space heating and domestic hot water requirements.
- Hot water to the commercial units will be provided by the centralised LTHW system that serves the residential scheme.
- Tenant fit out heating and cooling to the commercial units will be provided by a variable volume DX system.

#### *Be Green*

157. The relevant Be Green measures would generate a CO2 saving of 6.62%:

- The Developer and Project Team propose to reduce carbon dioxide emissions through the use of energy efficiency, CHP and building mounted PV panels.
- A 5.8% reduction in carbon emissions has been provided through the specification of an 80m2 rooftop PV array.

158. The Be lean/Be clean/Be green measures set out above would generate a 40.3% improvement beyond Buildings Regulations Part L 2013 and as such is policy compliant.

#### *Carbon Zero*

159. A contribution of £145,215 towards the Council's Carbon Off-set Green Fund will be secured in order to make the residential part of the development Carbon Zero in line with the requirements of the London Plan. It is recommended that the carbon savings be reviewed post-construction, which may require an adjustment to the S106 contribution amount.

#### *BREEAM*

160. The BREEAM pre-assessment demonstrates that the commercial spaces can achieve BREEAM Excellent which is supported. This will be secured by condition.

#### **Conclusion on planning issues**

161. The proposed development would result in the beneficial redevelopment of an industrial estate that fails to make the most efficient use of the site. There is a pressing need for housing in the borough and the scheme would deliver 111 new homes, including a policy compliant amount of family housing and 30 affordable housing units; this would equate to over 35% affordable housing by habitable room, with a policy compliant tenure split of social rented and shared ownership housing.

162. The proposed housing is considered to be of the highest standard as are the communal amenity spaces and play spaces which are positive aspects of the proposed development.

163. The provision of housing, retail and Class B8 use is supported by current development plan policies and will ensure that the scheme provides a range of uses to serve existing and future residents whilst activating what are currently dead frontages.

164. The architectural design would be of the highest quality and the proposal is appropriate in its urban form, scale and massing. It has no impact on heritage assets

and responds appropriately to local character and history.

165. Amenity impacts for some neighbouring buildings would be noticeable, however a detailed assessment has been carried out including a 'mirror image' assessment for the Porter Building and a comparison of the impacts between the consented scheme and the proposed scheme for Eldridge Court. On this basis, it is concluded that whilst the impacts would be significant, they would not be so harmful as to warrant the refusal of planning permission.
166. Officers have assessed the scheme against the relevant development plan policies, including all statutory guidance and subject to the completion of a S106 agreement and appropriate conditions, it is recommended that planning permission be granted.

Updated drawings confirm that no part of the building extends above 30 metres above ground level, and therefore the application is not referable to the Mayor for London.

### **Consultations**

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

### **Consultation replies**

168. Details of consultation responses received are set out in Appendix 2.
169. The following comments have been received from Statutory Consultees in response to the proposed development:
170. Environment Agency – No objections subject to conditions  
**Response** – Noted and agreed, the relevant conditions will be attached to any consent issued.
171. Historic England – No objections, the application should be determined in accordance with national and local policy guidance and on the basis of the Borough's specialist conservation advice.  
**Response** – Noted and agreed, the Council's Design and Conservation Team have been consulted on the proposed development and consider it to be a high quality design and appropriate to the local context.
172. London Fire and Emergency Planning Authority – An undertaking is required that access for fire appliances as required by part B5 of the Building Regulations will be provided.  
**Response** – This will be added as an informative as the development will be required to comply with the building regulations, including Part B5.
173. London Underground – No objections.  
**Response** – Noted.
174. Metropolitan Police Service - The development is suitable to achieve Secured by Design accreditation. The Metropolitan Police seek to have a 'Secured by Design' condition attached to any permission that may be granted in connection with this application.

**Response** – Noted and agreed, the relevant condition will be attached to any consent issued.

175. Natural England – No objections.

**Response** – Noted.

176. Thames Water – No objections subject to conditions and informatives.

**Response** – Noted and agreed, the relevant conditions and informatives will be added to any consent issued.

#### Summary of neighbour consultation responses

177. Following neighbour consultation, 39 objections and two letters of comment were received in response to the proposed development. Following consultation, a further 75 letters of objection have been received. Six letters of support have been received.

178. The letters of comment asked if future residents would be allowed to apply for parking permits with a further comment stating that they should be unable to apply for permits. Further comments were made stating that the scheme should reach BREEAM outstanding to improve environmental performance and affordability in the long run. As set out in the main body of the report, future residents would be exempt from being able to obtain parking permits and a condition will be imposed to ensure that the scheme meets BREEAM 'Excellent'

179. The letters of support expressed backing for the benefits that the scheme would bring to the area and local businesses and the positive impact this would have on residents and visitors. Support was expressed for the regeneration of the area as well as the provision of affordable housing. New pedestrian routes (low line) as well as investment in the local area was considered to be positive.

The main points of objection have been summarised and addressed below:

180. Objection - The proposed development is excessive in scale, massing and height.

**Response** – Officers consider that the proposed development would be a suitable addition to the area taking into account the local context and existing building heights which reach seven and eight storeys. Building form is similar to the consented scheme with the main change being the design of the facades and an increase in maximum height from seven to nine storeys.

181. Objection - The proposed development is excessive in density.

**Response** - The development as a whole would have a density of 1,082 habitable rooms per hectare. Since the maximum upper limit would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. Officers consider that the new homes would be of an exemplary standard despite not all of the requirements in the above table being met in their entirety. It is considered that the proposal would be of an appropriate height, scale and massing and the quantum of development would allow the provision of affordable housing to be maximised. Although there would be adverse impacts upon daylight and sunlight to some neighbouring properties, this must be weighed in the balance with all of the benefits arising from the scheme. When all of the benefits and disbenefits are taken into account, it is not considered that exceeding the density threshold would warrant withholding permission in this instance.

182. **Objection** - The development will over dominate the street and reduce natural light at street level. The proposed building should be no taller than 7 storeys including the ground floor in order to prevent overwhelming existing housing.  
**Response** – The development is considered to be appropriate to the local context in terms of height, scale and massing and the stepped massing is not considered to over dominate the street or surroundings.
183. **Objection** - The proposed central courtyard should be a public space.  
**Response** – The central courtyard is a communal amenity space provided for occupiers of the proposed development. Public access will be granted along the Low Line at weekends.
184. **Objection** - Neighbouring residents will experience a detrimental impact on their amenity.  
**Response** – The proposed development would have no adverse impact on neighbouring residents in terms of a loss of privacy, loss of outlook, or noise from the commercial uses (which can be mitigated by way of condition). It is accepted that there would be impacts on daylight and sunlight and these are discussed in more detail below.
185. **Objection** - The development does not include off-street parking and this will impact on the local area and residents.  
**Response** – The Council support the principle of car free development in order to reduce reliance on cars and promote more sustainable forms of transport. The site lies on the edge of a Controlled Parking Zone (CPZ) and it is likely that a new CPZ will be implemented that will encompass the application site. As such, all future residents and business owners will be made exempt from obtaining parking permits for any existing or future CPZ's within the borough.
186. **Objection** - There will be a significant impact on existing residents on Rouel Road and Dockley Road in terms of a loss of daylight and sunlight.  
**Response** - The proposed development would have a significant impact on the Porter Building and Eldridge Court. In the case of the Porter Building, if the mirror image of the Porter building was adopted as an alternative target value, as allowed for in the BRE, then the proposed development would not give rise to a significantly worsened impact on daylight. When considering Eldridge Court, the residual VSC levels are not untypical of urban areas and the proposed development is not significantly different to the consented scheme in terms of the level of impact on Eldridge Court. Overall there will be significant breaches of the BRE Guidelines and some of these are likely to be noticeable. However, such alterations are not always unusual in dense urban locations and the impacts identified in the Daylight and Sunlight report should be considered against wider policy context, local townscape and the overall benefits of the proposal including the policy compliant level of affordable housing and the provision of housing of an exemplary standard.
187. **Objection** - The proposed commercial uses within the scheme will create noise and disturb residents, or may end up vacant. A café and/or restaurants facing Rouel Road open late into the evening will no doubt generate significant noise and disturb residents on Rouel Road.  
**Response** - The proposed uses within the development would comprise Class A1, A3 and B8 as well as residential. Class B8 use is already in operation on the site and

Class A1 and A3 uses generally sit comfortably near to residential properties, and the scale of the Class A (retail) uses would not result in any significant loss of amenity. It is recommended that the opening hours of the Class A1, A3 and B8 uses be limited to 7am to 11pm daily by way of a condition. Conditions are also recommended limiting servicing hours and plant noise from the development.

188. **Objection** - There are concerns about the level of noise and traffic to/from the commercial properties at the proposed ground floor, specifically due to delivery lorries parking & loading supplies. This is a residential neighbourhood and the proximity of such increased road traffic could have a very negative impact on the area.

**Response** – Servicing will only take place within agreed hours in line with a Service Management Plan which has been secured by condition.

189. **Objection** - The development will put pressure on public transport.

**Response** – The development will result in an increase in public transport usage however given the range of public transport options it is not anticipated to result in overcrowding.

190. **Objection** - The development will over dominate the historic Bermondsey Spa railway Bridge.

**Response** - The historic railway bridge is set at the middle of the railway viaduct where it is flanked by modern viaduct widening schemes that have added three lines on either side of the historic railway bridge. This proposal is unlikely to have any impact on the setting of this heritage asset given how deep set it is within the viaduct and its limited visibility from within the viaduct itself. The proposal will have no impact on the setting of any other designated heritage asset. The viaduct itself has been considered as an undesignated heritage asset given its scale and elegant detailing. The proposal is separated from the currently occupied portion of the viaduct by the roadway that serves these premises. In this way it preserves the viaduct and its setting.

191. **Objection** - There is a concern that the proposed ground floor use of the development will end up vacant.

**Response** – It is expected the developer, who has considerable experience of managing and renting commercial space in the surrounding area, will conduct a marketing and advertising campaign that will result in the units being occupied.

192. **Objection** - The new proposed scheme has deviated from the consent in the sense that the ground floor units will now just be retail as opposed to the previously consented scheme whereby retail was ancillary to employment.

**Response** – Noted, with the exception of the large B8 unit, the commercial space would be occupied by Class A1 and A3 use. This does not conflict with policy as employment use is not protected in this location.

193. **Objection** - Although most of the elevations use beige-coloured panels, the other dominant colour (of grilles, railings, gates etc.) is black. Many recent developments in the area (along Spa Rd and Grange Walk for example) have used very dark brickwork and/or metalwork creating an unnecessarily gloomy environment.

**Response** – Final materials, type and tone will be secured and agreed by condition.

194. **Objection** - The original plan should be adhered to as industrial space is being seriously reduced locally and is part of a healthy mix of business and leisure use.

**Response** – The range of uses being proposed are compliant with saved Policy 1.4 of the Southwark Plan. The application site is not located on or have direct access to a classified road; is not located in a public transport accessibility zone; and is not located within either the Central Activities Zone or a Strategic Cultural Area and as such the loss of B Class floorspace is acceptable in line with saved policy 1.4.

195. **Objection** - Three accessible parking spaces is insufficient.

**Response** – The Council's Transport Team have agreed that three spaces would be acceptable given site constraints.

196. **Objection** - The proposal is an overdevelopment of the application site.

**Response** – The scale, height and massing of the buildings are considered to be appropriate to the local context and inner London location. It is acknowledged that the scheme exceeds the upper density limit however the new homes are considered to be of an exemplary standard. It is considered that the proposal would be of an appropriate height, scale and massing and the quantum of development would allow the provision of affordable housing to be maximised.

197. **Objection** - The building is poorly designed and out of character with the surrounding area.

**Response** – The proposed building is considered to be of a very high architectural standard and exemplifies good design which responds appropriately to the local character.

198. **Objection** - The building has been reduced in height to ensure it doesn't need to be referred to the GLA.

**Response** – The applicant has reviewed and revised the drawings to address the previous error on the drawings. The initial plans submitted with the application demonstrated that the building did not exceed 30 metres in height when measured from ground level. Revised plans submitted in advance of Committee appeared to show a small projection at roof level that would have taken the building beyond the 30 metres threshold. The applicant confirmed that this was an error on the drawings and the item was deferred in order to give the applicant time to review and correct the relevant drawings.

199. **Objection** - The development would result in more traffic which could compromise child safety and reduce air quality.

**Response** – Although the Councils Transport Team consider that the predicted vehicular trips would be higher than those of the applicant's consultants, the Transport Team consider that these levels of vehicular traffic would not have any significant adverse impact on the prevailing vehicle movements or traffic at this location. The Councils Environmental Protection Team have reviewed the applicants Air Quality Impact assessment produced by AECOM and agree with the reports findings and the development would achieve Air Quality Neutral standard for both vehicle and building emissions.

200. **Objection** - The proposed building will ruin the community feeling in the area.

**Response** – The proposed building is not considered to be a threat to the sense of community in the area, despite being higher than the immediately surrounding buildings.

201. Objection - The development will impact on views from surrounding flats and balconies.  
**Response** – The site is occupied by low rise industrial buildings. The development of the site will restrict some views over what is a low rise and open site but there is no right to a view over a third parties land.
202. Objection - There will adverse impacts on local infrastructure, services and transport.  
**Response** – The provision of 111 new homes is not considered to be detrimental to local services. The proposed development would be required to make a financial contribution to the Community Infrastructure Levy in order to mitigate impacts on infrastructure and fund improvements.
203. Objection - The development does not meet Council policy on affordable housing.  
**Response** – The development would provide 35.5% affordable housing which exceeds the 35% minimum set out in policy.
204. Objection - The proposal will result in overlooking to surrounding properties, most notably the Porter Building.  
**Response** – In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. All outward facing elevations of the proposed development would achieve at least 12 metres separation distance from adjacent buildings and in this respect it is not considered that there will be any adverse impact in terms of overlooking, loss of privacy or loss of outlook.
205. Objection - The development will have an adverse impact on the food market and local businesses.  
**Response** – Officers consider that the proposed commercial uses plus the opening of the low line passage at weekends would complement the food market and local businesses rather than harm them.
206. Objection - The proposed development is overpowering and would not be in keeping with improving quality of life, community, mental health, carbon neutral development or green spaces.  
**Response** – The proposed development would create well design, high quality new homes for families, including affordable homes. It would be an energy efficient development that would be air quality neutral with a suitable carbon reduction. The development is not considered to be overpowering nor is it considered to have an injurious impact on quality of life, mental health or sense of community.
207. Objection - The pre-app response on application 12/EQ/0038 stated that the height and overall quantum of development was considered to be excessive. The same planning officer's support for the present proposals is therefore a complete change of position.  
**Response** – The pre-application enquiry was undertaken by a different planning officer to that dealing with the current application. The proposed scheme is an entirely different design and whilst heights of nine storeys are being proposed, the massing and position of tall elements is different to the pre-application referred to dating back to 2012.

208. **Objection** - Southwark is set to exceed its housing target and as such there is no requirement for such a large scheme.  
**Response** – There is a shortage of affordable homes in Southwark and across London. Providing new affordable homes suitable for a range of affordable housing need is our main priority. This includes social rent and intermediate tenure homes. Our evidence shows that Southwark has a net additional housing requirement for 1,472 to 1,824 homes per year (2013-2031).
209. **Objection** - The Viability Assessment is insufficient in detail and evidence, some of the values are optimistic and there is no confirmation from senior lenders that they consider the scheme to be viable.  
**Response** – The application is accompanied by a viability appraisal which has been independently reviewed by GVA (now Avison Young) on behalf of the Council. The proposed affordable housing offer would be policy compliant and this is demonstrated as being viable in the Financial Viability Appraisal submitted with the application.
210. **Objection** - The public consultation exercise that was undertaken by the applicant was insufficient.  
**Response** – The applicant has submitted a Statement of Community Involvement detailing the consultation that took place in advance of the application submission. This included a public exhibition, engagement with Ward Councillors, distribution of flyers and direct mailing to residents of buildings immediately surrounding the site and advertisement in Southwark Life. In addition to this the Council has undertaken two rounds of statutory consultation involving advertisement in the Southwark News
211. **Objection** - The proposed scheme compares very poorly with the consented scheme.  
**Response** – The proposed development maintains many aspects of the consented scheme, particularly with regards to the basic building form and range of uses. The detailed design and architecture are completely different and the scheme has been assessed on its own merits.
212. A letter of objection has been received from Southwark Law Centre. The letter states that a decision cannot be taken on the application as, contrary to Article 4 of The Mayor of London Order (2008), Southwark Council did not notify the Greater London Authority of the application given the fact that the proposed building exceeds 30 metres in height.
213. The current application was received by Southwark Council on 9 January 2018 and made valid on 2 February 2018. The Greater London Authority were notified of the application on 8 February 2018. Whilst the development description sets out the maximum height of the proposed development as AOD, the height of the building for the purposes of GLA referral is taken from ground level. After confirming with the GLA on 22 February 2018 that the height of the building was 29.8m above ground level, the GLA confirmed that the application was not be referable.
214. However, following some minor plan revisions received on 3 December 2018, the elevations showed a lift over run which would push the building above 30m from ground level (approximately 30.71 metres). On this basis the application was deferred from the committee on 15 January 2019 in order to allow the applicant's architects to confirm the accurate height of the building. The letter from Southwark Law Centre goes on to raise further points regarding non-compliance with some policies of the Draft New Southwark Plan and the Draft London Plan however, these policy

documents have not been adopted and are attributed limited weight at this stage. The application complies with the Core Strategy and saved policies of the Southwark Plan in terms of replacement industrial land.

215.

The Southwark Law Centre letter states that the scheme is not compliant with the land use policy on the basis that the site is located within an Action Area core and as such the employment land is protected. This criterion is included in the Core Strategy, but this document, at Figure 31, is clear that the site is not in an Action Area. As such the employment floorspace is not protected. This letter raises further points related to density of development, quality of accommodation and daylight/sunlight impacts, all of which are addressed in the committee report.

### **Community impact statement / Equalities Assessment**

216. 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:

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

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

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

219. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

### **Human rights implications**

220. 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.

221. This application has the legitimate aim of providing new homes and commercial space. 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/361-128 Application file: 18/AP/0091 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5365 Council website: www.southwark.gov.uk

## APPENDICES

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

## AUDIT TRAIL

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Terence McLellan, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	20 March 2019	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
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
<b>Date final report sent to Constitutional Team</b>	22 March 2019	

## APPENDIX 1

### Consultation undertaken

**Site notice date:** 07/02/2018

**Press notice date:** 15/02/2018

**Case officer site visit date:** 16/05/2018

**Neighbour consultation letters sent:** 08/02/2018

#### 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:

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

## Neighbour and local groups consulted:

Flat 23 130 Spa Road SE16 3FL  
Flat 22 130 Spa Road SE16 3FL  
Flat 25 130 Spa Road SE16 3FL  
Flat 24 130 Spa Road SE16 3FL  
Flat 21 130 Spa Road SE16 3FL  
Flat 18 130 Spa Road SE16 3FL  
Flat 17 130 Spa Road SE16 3FL  
Flat 20 130 Spa Road SE16 3FL  
Flat 19 130 Spa Road SE16 3FL  
Flat 32 130 Spa Road SE16 3FL  
Flat 31 130 Spa Road SE16 3FL  
Flat 34 130 Spa Road SE16 3FL  
Flat 33 130 Spa Road SE16 3FL  
Flat 30 130 Spa Road SE16 3FL  
Flat 27 130 Spa Road SE16 3FL  
Flat 26 130 Spa Road SE16 3FL  
Flat 29 130 Spa Road SE16 3FL  
Flat 28 130 Spa Road SE16 3FL  
Flat 5 130 Spa Road SE16 3FL  
Flat 4 130 Spa Road SE16 3FL  
Flat 7 130 Spa Road SE16 3FL  
Flat 6 130 Spa Road SE16 3FL  
Flat 3 130 Spa Road SE16 3FL  
128 Spa Road London SE16 3FL  
Flat 2 130 Spa Road SE16 3FL  
Flat 1 130 Spa Road SE16 3FL  
Flat 14 130 Spa Road SE16 3FL  
Flat 13 130 Spa Road SE16 3FL  
Flat 16 130 Spa Road SE16 3FL  
Flat 15 130 Spa Road SE16 3FL  
Flat 12 130 Spa Road SE16 3FL  
Flat 9 130 Spa Road SE16 3FL  
Flat 8 Porter Building 130 Spa Road SE16 3FL  
Flat 11 130 Spa Road SE16 3FL  
Flat 10 130 Spa Road SE16 3FL  
114 Lucey Way London SE16 3UF  
112 Lucey Way London SE16 3UF  
118 Lucey Way London SE16 3UF  
116 Lucey Way London SE16 3UF  
110 Lucey Way London SE16 3UF  
104 Lucey Way London SE16 3UF  
102 Lucey Way London SE16 3UF  
108 Lucey Way London SE16 3UF  
106 Lucey Way London SE16 3UF  
230 Lucey Way London SE16 3UG  
228 Lucey Way London SE16 3UG  
234 Lucey Way London SE16 3UG  
232 Lucey Way London SE16 3UG  
226 Lucey Way London SE16 3UG  
122 Lucey Way London SE16 3UF  
120 Lucey Way London SE16 3UF  
98 Lucey Way London SE16 3UF  
124 Lucey Way London SE16 3UF  
Porter Building 60 Rouel Road SE16 3FL  
Arch 4 To 6 Spa Business Park SE16 3FJ  
Flat 36 130 Spa Road SE16 3FL  
Flat 35 130 Spa Road SE16 3FL  
89 Spa Road London SE16 3SG  
Unit 4 Voyager Business Estate SE16 4RP  
100 Lucey Way London SE16 3UF  
Flat 2 75 Rouel Road SE16 3SL  
Flat 16 Messenger Court SE16 4AU  
Flat 15 Messenger Court SE16 4AU  
Flat 18 Messenger Court SE16 4AU  
Flat 17 Messenger Court SE16 4AU  
Flat 14 Messenger Court SE16 4AU  
Flat 11 Messenger Court SE16 4AU  
Flat 10 Messenger Court SE16 4AU  
Flat 13 Messenger Court SE16 4AU  
Flat 12 Messenger Court SE16 4AU  
Flat 126 Bolanchi Building SE16 3EX  
Flat 129 Bolanchi Building SE16 3EX  
Flat 128 Bolanchi Building SE16 3EX  
Flat 125 Bolanchi Building SE16 3EX  
Flat 122 Bolanchi Building SE16 3EX  
Flat 121 Bolanchi Building SE16 3EX  
Flat 124 Bolanchi Building SE16 3EX  
Flat 123 Bolanchi Building SE16 3EX  
Flat 136 Bolanchi Building SE16 3EX  
Flat 135 Bolanchi Building SE16 3EX  
Flat 138 Bolanchi Building SE16 3EX  
Flat 137 Bolanchi Building SE16 3EX  
Flat 134 Bolanchi Building SE16 3EX  
Flat 131 Bolanchi Building SE16 3EX  
Flat 130 Bolanchi Building SE16 3EX  
Flat 133 Bolanchi Building SE16 3EX  
Flat 132 Bolanchi Building SE16 3EX  
Flat 109 Bolanchi Building SE16 3EX  
Flat 108 Bolanchi Building SE16 3EX  
Flat 111 Bolanchi Building SE16 3EX  
Flat 110 Bolanchi Building SE16 3EX  
Flat 107 Bolanchi Building SE16 3EX  
Flat 104 Bolanchi Building SE16 3EX  
Flat 103 Bolanchi Building SE16 3EX  
Flat 106 Bolanchi Building SE16 3EX  
Flat 105 Bolanchi Building SE16 3EX  
Flat 118 Bolanchi Building SE16 3EX  
Flat 117 Bolanchi Building SE16 3EX  
Flat 120 Bolanchi Building SE16 3EX  
Flat 119 Bolanchi Building SE16 3EX  
Flat 116 Bolanchi Building SE16 3EX  
Flat 113 Bolanchi Building SE16 3EX  
Flat 112 Bolanchi Building SE16 3EX  
Flat 115 Bolanchi Building SE16 3EX  
Flat 114 Bolanchi Building SE16 3EX  
23 Sandover House 124 Spa Road SE16 3FD  
22 Sandover House 124 Spa Road SE16 3FD  
25 Sandover House 124 Spa Road SE16 3FD  
24 Sandover House 124 Spa Road SE16 3FD  
21 Sandover House 124 Spa Road SE16 3FD  
18 Sandover House 124 Spa Road SE16 3FD  
17 Sandover House 124 Spa Road SE16 3FD  
20 Sandover House 124 Spa Road SE16 3FD  
19 Sandover House 124 Spa Road SE16 3FD  
32 Sandover House 124 Spa Road SE16 3FD  
31 Sandover House 124 Spa Road SE16 3FD  
34 Sandover House 124 Spa Road SE16 3FD  
33 Sandover House 124 Spa Road SE16 3FD  
30 Sandover House 124 Spa Road SE16 3FD  
27 Sandover House 124 Spa Road SE16 3FD  
26 Sandover House 124 Spa Road SE16 3FD  
29 Sandover House 124 Spa Road SE16 3FD  
28 Sandover House 124 Spa Road SE16 3FD  
5 Sandover House 124 Spa Road SE16 3FD  
4 Sandover House 124 Spa Road SE16 3FD  
7 Sandover House 124 Spa Road SE16 3FD  
6 Sandover House 124 Spa Road SE16 3FD  
3 Sandover House 124 Spa Road SE16 3FD  
2 Sandover House 124 Spa Road SE16 3FD  
1 Sandover House 124 Spa Road SE16 3FD  
14 Sandover House 124 Spa Road SE16 3FD  
13 Sandover House 124 Spa Road SE16 3FD  
16 Sandover House 124 Spa Road SE16 3FD  
15 Sandover House 124 Spa Road SE16 3FD  
12 Sandover House 124 Spa Road SE16 3FD  
9 Sandover House 124 Spa Road SE16 3FD  
8 Sandover House 124 Spa Road SE16 3FD  
11 Sandover House 124 Spa Road SE16 3FD  
10 Sandover House 124 Spa Road SE16 3FD  
Flat 102 Bolanchi Building SE16 3EX

Flat 25 Messenger Court SE16 4AU  
Flat 24 Messenger Court SE16 4AU  
Flat 27 Messenger Court SE16 4AU  
Flat 26 Messenger Court SE16 4AU  
Flat 23 Messenger Court SE16 4AU  
Flat 20 Messenger Court SE16 4AU  
Flat 19 Messenger Court SE16 4AU  
Flat 22 Messenger Court SE16 4AU  
Flat 21 Messenger Court SE16 4AU  
42 Sandover House 124 Spa Road SE16 3FD  
41 Sandover House 124 Spa Road SE16 3FD  
Sales Office The Keyse Development Spa Road SE16 3QT  
40 Sandover House 124 Spa Road SE16 3FD  
37 Sandover House 124 Spa Road SE16 3FD  
36 Sandover House 124 Spa Road SE16 3FD  
39 Sandover House 124 Spa Road SE16 3FD  
38 Sandover House 124 Spa Road SE16 3FD  
Flat 7 Messenger Court SE16 4AU  
Flat 6 Messenger Court SE16 4AU  
Flat 9 Messenger Court SE16 4AU  
Flat 8 Messenger Court SE16 4AU  
Flat 5 Messenger Court SE16 4AU  
Flat 2 Messenger Court SE16 4AU  
Flat 1 Messenger Court SE16 4AU  
Flat 4 Messenger Court SE16 4AU  
Flat 3 Messenger Court SE16 4AU  
Unit 3 Spa Business Park SE16 4EJ  
Unit 1 11 And 12 Spa Business Park SE16 4QT  
Arch 2 148 Spa Road SE16 3QT  
Unit 2 Spa Business Park SE16 4EJ  
First Floor Unit 10 Dockley Road Industrial Estate SE16 3SF  
Ground Floor Unit 10 Dockley Road Industrial Estate SE16 3SF  
Unit 1 Spa Business Park SE16 4EJ  
67 Rouel Road London SE16 3SL  
65 Rouel Road London SE16 3SL  
Flat 1 75 Rouel Road SE16 3SL  
69 Rouel Road London SE16 3SL  
126 Spa Road London SE16 3FF  
73 Rouel Road London SE16 3SL  
71 Rouel Road London SE16 3SL  
77 Rouel Road London SE16 3SL  
Unit 3 Atlantic Business Estate SE16 3SU  
Flat 33 Messenger Court SE16 4AU  
Unit 4 Spa Business Park SE16 3FJ  
Flat 32 Messenger Court SE16 4AU  
Flat 29 Messenger Court SE16 4AU  
Flat 28 Messenger Court SE16 4AU  
Flat 31 Messenger Court SE16 4AU  
Flat 30 Messenger Court SE16 4AU  
Unit 11 Spa Business Park SE16 3FJ  
Unit 10 Spa Business Park SE16 3FJ  
Unit 13 Spa Business Park SE16 3FJ  
Unit 12 Spa Business Park SE16 3FJ  
Unit 9 Spa Business Park SE16 3FJ  
Unit 6 Spa Business Park SE16 3FJ  
Unit 5 Spa Business Park SE16 3FJ  
Unit 8 Spa Business Park SE16 3FJ  
Unit 7 Spa Business Park SE16 3FJ  
236 Lucey Way London SE16 3UG  
81 Goodwin Close London SE16 3TL  
80 Goodwin Close London SE16 3TL  
Unit 10 Dockley Road Industrial Estate SE16 3SF  
Unit 3 Dockley Road Industrial Estate SE16 3SF  
79 Goodwin Close London SE16 3TL  
76 Goodwin Close London SE16 3TL  
75 Goodwin Close London SE16 3TL  
78 Goodwin Close London SE16 3TL  
77 Goodwin Close London SE16 3TL  
Unit 7 Voyager Business Estate SE16 4RP  
Unit 6 Voyager Business Estate SE16 4RP  
Unit 1 Voyager Business Estate SE16 4RP  
Unit 8 Voyager Business Estate SE16 4RP

Flat 55 Bolanachi Building SE16 3SG  
Flat 54 Bolanachi Building SE16 3SG  
Flat 57 Bolanachi Building SE16 3SG  
Flat 56 Bolanachi Building SE16 3SG  
Flat 53 Bolanachi Building SE16 3SG  
Flat 50 Bolanachi Building SE16 3SG  
Flat 49 Bolanachi Building SE16 3SG  
Flat 52 Bolanachi Building SE16 3SG  
Flat 51 Bolanachi Building SE16 3SG  
Flat 64 Bolanachi Building SE16 3SG  
Flat 63 Bolanachi Building SE16 3SG  
Flat 66 Bolanachi Building SE16 3SG  
Flat 65 Bolanachi Building SE16 3SG  
Flat 62 Bolanachi Building SE16 3SG  
Flat 59 Bolanachi Building SE16 3SG  
Flat 58 Bolanachi Building SE16 3SG  
Flat 61 Bolanachi Building SE16 3SG  
Flat 60 Bolanachi Building SE16 3SG  
Flat 37 Bolanachi Building SE16 3SG  
Flat 36 Bolanachi Building SE16 3SG  
Flat 39 Bolanachi Building SE16 3SG  
Flat 38 Bolanachi Building SE16 3SG  
Flat 35 Bolanachi Building SE16 3SG  
Flat 32 Bolanachi Building SE16 3SG  
Flat 31 Bolanachi Building SE16 3SG  
Flat 34 Bolanachi Building SE16 3SG  
Flat 33 Bolanachi Building SE16 3SG  
Flat 46 Bolanachi Building SE16 3SG  
Flat 45 Bolanachi Building SE16 3SG  
Flat 48 Bolanachi Building SE16 3SG  
Flat 47 Bolanachi Building SE16 3SG  
Flat 44 Bolanachi Building SE16 3SG  
Flat 41 Bolanachi Building SE16 3SG  
Flat 40 Bolanachi Building SE16 3SG  
Flat 43 Bolanachi Building SE16 3SG  
Flat 42 Bolanachi Building SE16 3SG  
Flat 90 Bolanachi Building SE16 3EX  
Flat 89 Bolanachi Building SE16 3EX  
Flat 92 Bolanachi Building SE16 3EX  
Flat 91 Bolanachi Building SE16 3EX  
Flat 88 Bolanachi Building SE16 3EX  
Flat 85 Bolanachi Building SE16 3EX  
Flat 84 Bolanachi Building SE16 3EX  
Flat 87 Bolanachi Building SE16 3EX  
Flat 86 Bolanachi Building SE16 3EX  
Flat 99 Bolanachi Building SE16 3EX  
Flat 98 Bolanachi Building SE16 3EX  
Flat 101 Bolanachi Building SE16 3EX  
Flat 100 Bolanachi Building SE16 3EX  
Flat 97 Bolanachi Building SE16 3EX  
Flat 94 Bolanachi Building SE16 3EX  
Flat 93 Bolanachi Building SE16 3EX  
Flat 96 Bolanachi Building SE16 3EX  
Flat 95 Bolanachi Building SE16 3EX  
Flat 73 Bolanachi Building SE16 3SG  
Flat 72 Bolanachi Building SE16 3SG  
Flat 75 Bolanachi Building SE16 3SG  
Flat 74 Bolanachi Building SE16 3SG  
Flat 71 Bolanachi Building SE16 3SG  
Flat 68 Bolanachi Building SE16 3SG  
Flat 67 Bolanachi Building SE16 3SG  
Flat 70 Bolanachi Building SE16 3SG  
Flat 69 Bolanachi Building SE16 3SG  
Flat 81 Bolanachi Building SE16 3EX  
Flat 83 Bolanachi Building SE16 3EX  
Flat 82 Bolanachi Building SE16 3EX  
Flat 80 Bolanachi Building SE16 3SG  
Flat 77 Bolanachi Building SE16 3SG  
Flat 76 Bolanachi Building SE16 3SG  
Flat 79 Bolanachi Building SE16 3SG  
Flat 78 Bolanachi Building SE16 3SG  
Flat 53 Eyot House SE16 4BP

Unit 2 Voyager Business Estate SE16 4RP  
Unit 7 Dockley Road Industrial Estate SE16 3SF  
Unit 11 Dockley Road Industrial Estate SE16 3SF  
Unit 6 Dockley Road Industrial Estate SE16 3SF  
Flat 6 Eldridge Court SE16 3SN  
Flat 5 Eldridge Court SE16 3SN  
Flat 8 Eldridge Court SE16 3SN  
Flat 7 Eldridge Court SE16 3SN  
Flat 4 Eldridge Court SE16 3SN  
Flat 36 Eldridge Court SE16 3SN  
Flat 35 Eldridge Court SE16 3SN  
Flat 38 Eldridge Court SE16 3SN  
Flat 37 Eldridge Court SE16 3SN  
Unit 9 Dockley Road Industrial Estate SE16 3SF  
Unit 8 Dockley Road Industrial Estate SE16 3SF  
74 Goodwin Close London SE16 3TL  
73 Goodwin Close London SE16 3TL  
Unit 5 Dockley Road Industrial Estate SE16 3SF  
Unit 1 Dockley Road Industrial Estate SE16 3SF  
Flat 9 Eldridge Court SE16 3SN  
Unit 4 Dockley Road Industrial Estate SE16 3SF  
Unit 2 Dockley Road Industrial Estate SE16 3SF  
Flat 24 Spa Court SE16 3SL  
Flat 23 Spa Court SE16 3SL  
Unit 1 Atlantic Business Estate SE16 3SU  
Railway Arch 700w Dockley Road SE16 4QT  
Flat 22 Spa Court SE16 3SL  
Flat 19 Spa Court SE16 3SL  
Flat 18 Spa Court SE16 3SL  
Flat 21 Spa Court SE16 3SL  
Flat 20 Spa Court SE16 3SL  
Unit 4 Atlantic Business Estate SE16 3SU  
Unit 2 Atlantic Business Estate SE16 3SU  
Unit 5b Voyager Business Centre SE16 4RP  
Unit 5a Voyager Business Centre SE16 4RP  
Flat 6 Spa Court SE16 3SL  
Flat 5 Spa Court SE16 3SL  
Flat 8 Spa Court SE16 3SL  
Flat 7 Spa Court SE16 3SL  
Flat 4 Spa Court SE16 3SL  
Flat 1 Spa Court SE16 3SL  
Unit 3 Voyager Business Estate SE16 4RP  
Flat 3 Spa Court SE16 3SL  
Flat 2 Spa Court SE16 3SL  
Flat 15 Spa Court SE16 3SL  
Flat 14 Spa Court SE16 3SL  
Flat 17 Spa Court SE16 3SL  
Flat 16 Spa Court SE16 3SL  
Flat 13 Spa Court SE16 3SL  
Flat 10 Spa Court SE16 3SL  
Flat 9 Spa Court SE16 3SL  
Flat 12 Spa Court SE16 3SL  
Flat 11 Spa Court SE16 3SL  
Flat 34 Eldridge Court SE16 3SN  
132 Amina Way London SE16 3UW  
130 Amina Way London SE16 3UW  
136 Amina Way London SE16 3UW  
134 Amina Way London SE16 3UW  
128 Amina Way London SE16 3UW  
122 Amina Way London SE16 3UW  
120 Amina Way London SE16 3UW  
126 Amina Way London SE16 3UW  
124 Amina Way London SE16 3UW  
  
76 Amina Way London SE16 3UW  
74 Amina Way London SE16 3UW  
80 Amina Way London SE16 3UW  
78 Amina Way London SE16 3UW  
72 Amina Way London SE16 3UW  
140 Amina Way London SE16 3UW  
138 Amina Way London SE16 3UW  
144 Amina Way London SE16 3UW

Flat 52 Eyot House SE16 4BN  
Flat 54 Eyot House SE16 4BP  
Flat 57 Eyot House SE16 4BP  
Flat 56 Eyot House SE16 4BP  
Flat 55 Eyot House SE16 4BP  
Flat 51 Eyot House SE16 4BN  
Flat 46 Eyot House SE16 4BN  
Flat 45 Eyot House SE16 4BN  
Flat 44 Eyot House SE16 4BN  
Flat 47 Eyot House SE16 4BN  
Flat 50 Eyot House SE16 4BN  
Flat 49 Eyot House SE16 4BN  
Flat 48 Eyot House SE16 4BN  
Flat 58 Eyot House SE16 4BP  
Flat 69 Eyot House SE16 4BP  
Flat 68 Eyot House SE16 4BP  
Flat 67 Eyot House SE16 4BP  
Flat 70 Eyot House SE16 4BP  
Flat 73 Eyot House SE16 4BP  
Flat 72 Eyot House SE16 4BP  
Flat 71 Eyot House SE16 4BP  
Flat 66 Eyot House SE16 4BP  
Flat 61 Eyot House SE16 4BP  
Flat 60 Eyot House SE16 4BP  
Flat 59 Eyot House SE16 4BP  
Flat 62 Eyot House SE16 4BP  
Flat 65 Eyot House SE16 4BP  
Flat 64 Eyot House SE16 4BP  
Flat 63 Eyot House SE16 4BP  
Flat 23 Eyot House SE16 4BN  
Flat 22 Eyot House SE16 4BN  
Flat 21 Eyot House SE16 4BN  
Flat 24 Eyot House SE16 4BN  
Flat 27 Eyot House SE16 4BN  
Flat 26 Eyot House SE16 4BN  
Flat 25 Eyot House SE16 4BN  
Flat 20 Eyot House SE16 4BN  
Flat 15 Eyot House SE16 4BN  
Flat 14 Eyot House SE16 4BN  
Flat 13 Eyot House SE16 4BN  
Flat 16 Eyot House SE16 4BN  
Flat 19 Eyot House SE16 4BN  
Flat 18 Eyot House SE16 4BN  
Flat 17 Eyot House SE16 4BN  
Flat 28 Eyot House SE16 4BN  
Flat 39 Eyot House SE16 4BN  
Flat 38 Eyot House SE16 4BN  
Flat 37 Eyot House SE16 4BN  
Flat 40 Eyot House SE16 4BN  
Flat 43 Eyot House SE16 4BN  
Flat 42 Eyot House SE16 4BN  
Flat 41 Eyot House SE16 4BN  
Flat 36 Eyot House SE16 4BN  
Flat 31 Eyot House SE16 4BN  
Flat 30 Eyot House SE16 4BN  
Flat 29 Eyot House SE16 4BN  
Flat 32 Eyot House SE16 4BN  
Flat 35 Eyot House SE16 4BN  
Flat 34 Eyot House SE16 4BN  
Flat 33 Eyot House SE16 4BN  
Flat 114 Eyot House SE16 4BP  
Flat 113 Eyot House SE16 4BP  
Bermondsey Spa Medical Practice Eyot House SE16 4BL  
Flat 2 Dickens Whinney House SE16 4AA  
Flat 1 Dickens Whinney House SE16 4AA  
Flat 112 Eyot House SE16 4BP  
Flat 107 Eyot House SE16 4BP  
Flat 106 Eyot House SE16 4BP  
Flat 105 Eyot House SE16 4BP  
Flat 108 Eyot House SE16 4BP  
Flat 111 Eyot House SE16 4BP

142 Amina Way London SE16 3UW  
250 Lucey Way London SE16 3UG  
248 Lucey Way London SE16 3UG  
100 Amina Way London SE16 3UW  
252 Lucey Way London SE16 3UG  
246 Lucey Way London SE16 3UG  
240 Lucey Way London SE16 3UG  
238 Lucey Way London SE16 3UG  
244 Lucey Way London SE16 3UG  
242 Lucey Way London SE16 3UG  
114 Amina Way London SE16 3UW  
112 Amina Way London SE16 3UW  
118 Amina Way London SE16 3UW  
116 Amina Way London SE16 3UW  
110 Amina Way London SE16 3UW  
104 Amina Way London SE16 3UW  
102 Amina Way London SE16 3UW  
108 Amina Way London SE16 3UW  
106 Amina Way London SE16 3UW  
Flat 23 Eldridge Court SE16 3SN  
Flat 22 Eldridge Court SE16 3SN  
Flat 25 Eldridge Court SE16 3SN  
Flat 24 Eldridge Court SE16 3SN  
Flat 21 Eldridge Court SE16 3SN  
Flat 19 Eldridge Court SE16 3SN  
Flat 18 Eldridge Court SE16 3SN  
Flat 20 Eldridge Court SE16 3SN  
Flat 2 Eldridge Court SE16 3SN  
Flat 31 Eldridge Court SE16 3SN  
Flat 30 Eldridge Court SE16 3SN  
Flat 33 Eldridge Court SE16 3SN  
Flat 32 Eldridge Court SE16 3SN  
Flat 3 Eldridge Court SE16 3SN  
Flat 27 Eldridge Court SE16 3SN  
Flat 26 Eldridge Court SE16 3SN  
Flat 29 Eldridge Court SE16 3SN  
Flat 28 Eldridge Court SE16 3SN  
94 Amina Way London SE16 3UW  
92 Amina Way London SE16 3UW  
98 Amina Way London SE16 3UW  
96 Amina Way London SE16 3UW  
90 Amina Way London SE16 3UW  
84 Amina Way London SE16 3UW  
82 Amina Way London SE16 3UW  
88 Amina Way London SE16 3UW  
86 Amina Way London SE16 3UW  
Flat 15 Eldridge Court SE16 3SN  
Flat 14 Eldridge Court SE16 3SN  
Flat 17 Eldridge Court SE16 3SN  
Flat 16 Eldridge Court SE16 3SN  
Flat 13 Eldridge Court SE16 3SN  
Flat 10 Eldridge Court SE16 3SN  
Flat 1 Eldridge Court SE16 3SN  
Flat 12 Eldridge Court SE16 3SN  
Flat 11 Eldridge Court SE16 3SN  
35 Sandover House 124 Spa Road SE16 3FD  
Flat 87 Hicks House SE16 4AS  
Flat 86 Hicks House SE16 4AS  
Flat 89 Hicks House SE16 4AS  
Flat 88 Hicks House SE16 4AS  
Flat 85 Hicks House SE16 4AS  
Flat 82 Hicks House SE16 4AS  
Flat 81 Hicks House SE16 4AS  
Flat 84 Hicks House SE16 4AS  
Flat 83 Hicks House SE16 4AS  
Flat 96 Hicks House SE16 4AS  
Flat 95 Hicks House SE16 4AS  
Flat 98 Hicks House SE16 4AS  
Flat 97 Hicks House SE16 4AS  
Flat 94 Hicks House SE16 4AS  
Flat 91 Hicks House SE16 4AS  
Flat 90 Hicks House SE16 4AS

Flat 110 Eyot House SE16 4BP  
Flat 109 Eyot House SE16 4BP  
Flat 3 Dickens Whinney House SE16 4AA  
Flat 57b Eyot House SE16 4BP  
Flat 57a Eyot House SE16 4BP  
Flat 1c Eyot House SE16 4BN  
Flat 57c Eyot House SE16 4BP  
Surgery Thurland Road SE16 4AA  
Dickens Whinney House 2 Thurland Road SE16 4AA  
Shop Eyot House SE16 4TE  
Flat 1b Eyot House SE16 4BN  
Flat 6 Dickens Whinney House SE16 4AA  
Flat 5 Dickens Whinney House SE16 4AA  
Flat 4 Dickens Whinney House SE16 4AA  
Flat 7 Dickens Whinney House SE16 4AA  
Flat 1a Eyot House SE16 4BN  
St James Vicarage 4 Thurland Road SE16 4AA  
Flat 8 Dickens Whinney House SE16 4AA  
Flat 84 Eyot House SE16 4BP  
Flat 83 Eyot House SE16 4BP  
Flat 82 Eyot House SE16 4BP  
Flat 85 Eyot House SE16 4BP  
Flat 88 Eyot House SE16 4BP  
Flat 87 Eyot House SE16 4BP  
Flat 86 Eyot House SE16 4BP  
Flat 81 Eyot House SE16 4BP  
Flat 76 Eyot House SE16 4BP  
Flat 75 Eyot House SE16 4BP  
Flat 74 Eyot House SE16 4BP  
Flat 77 Eyot House SE16 4BP  
Flat 80 Eyot House SE16 4BP  
Flat 79 Eyot House SE16 4BP  
Flat 78 Eyot House SE16 4BP  
Flat 89 Eyot House SE16 4BP  
Flat 100 Eyot House SE16 4BP  
Flat 99 Eyot House SE16 4BP  
Flat 98 Eyot House SE16 4BP  
Flat 101 Eyot House SE16 4BP  
Flat 104 Eyot House SE16 4BP  
Flat 103 Eyot House SE16 4BP  
Flat 102 Eyot House SE16 4BP  
Flat 97 Eyot House SE16 4BP  
Flat 92 Eyot House SE16 4BP  
Flat 91 Eyot House SE16 4BP  
Flat 90 Eyot House SE16 4BP  
Flat 93 Eyot House SE16 4BP  
Flat 96 Eyot House SE16 4BP  
Flat 95 Eyot House SE16 4BP  
Flat 94 Eyot House SE16 4BP  
Flat 40 Prospect House SE16 4AE  
Flat 39 Prospect House SE16 4AE  
Flat 38 Prospect House SE16 4AE  
Flat 41 Prospect House SE16 4AE  
Flat 44 Prospect House SE16 4AE  
Flat 43 Prospect House SE16 4AE  
Flat 42 Prospect House SE16 4AE  
Flat 37 Prospect House SE16 4AE  
Flat 32 Prospect House SE16 4AE  
Flat 31 Prospect House SE16 4AE  
Flat 30 Prospect House SE16 4AE  
Flat 33 Prospect House SE16 4AE  
Flat 36 Prospect House SE16 4AE  
Flat 35 Prospect House SE16 4AE  
Flat 34 Prospect House SE16 4AE  
Flat 45 Prospect House SE16 4AE  
Flat 55 Prospect House SE16 4AE  
Flat 54 Prospect House SE16 4AE  
Flat 56 Prospect House SE16 4AF  
Flat 59 Prospect House SE16 4AF  
Flat 58 Prospect House SE16 4AF  
Flat 57 Prospect House SE16 4AF  
Flat 53 Prospect House SE16 4AE



Flat 20 Hicks House SE16 4AH  
Flat 19 Hicks House SE16 4AH  
Railway Arches 111 To 116 And 704 To 708 And 704w And 705w And  
706w Spa Road SE16 4QT  
Flat 5 Hicks House SE16 4AH  
Flat 4 Hicks House SE16 4AH  
Flat 7 Hicks House SE16 4AH  
Flat 6 Hicks House SE16 4AH  
Flat 3 Hicks House SE16 4AH  
Flat 37 Hicks House SE16 4AQ  
Flat 2 Hicks House SE16 4AH  
Flat 1 Hicks House SE16 4AH  
Flat 50 Hicks House SE16 4AS  
Flat 49 Hicks House SE16 4AR  
Flat 52 Hicks House SE16 4AS  
Flat 51 Hicks House SE16 4AS  
Flat 48 Hicks House SE16 4AQ  
Flat 45 Hicks House SE16 4AQ  
Flat 44 Hicks House SE16 4AQ  
Flat 47 Hicks House SE16 4AQ  
Flat 46 Hicks House SE16 4AQ  
Flat 59 Hicks House SE16 4AS  
Flat 58 Hicks House SE16 4AS  
Flat 61 Hicks House SE16 4AS  
Flat 60 Hicks House SE16 4AS  
Flat 57 Hicks House SE16 4AS  
Flat 54 Hicks House SE16 4AS  
Flat 53 Hicks House SE16 4AS  
Flat 56 Hicks House SE16 4AS  
Flat 55 Hicks House SE16 4AS  
Flat 32 Hicks House SE16 4AH  
Flat 31 Hicks House SE16 4AH  
Flat 34 Hicks House SE16 4AH  
Flat 33 Hicks House SE16 4AH  
Flat 30 Hicks House SE16 4AH  
Flat 27 Hicks House SE16 4AH  
Flat 26 Hicks House SE16 4AH  
Flat 29 Hicks House SE16 4AH  
Flat 28 Hicks House SE16 4AH  
Flat 41 Hicks House SE16 4AQ  
Flat 40 Hicks House SE16 4AQ  
Flat 43 Hicks House SE16 4AQ  
Flat 42 Hicks House SE16 4AQ  
Flat 39 Hicks House SE16 4AQ  
Flat 36 Hicks House SE16 4AH  
Flat 35 Hicks House SE16 4AH  
Flat 38 Hicks House SE16 4AQ  
Flat 30 Bolanachi Building SE16 3SG  
Flat 127 Bolanachi Building SE16 3EX

Flat 67 Prospect House SE16 4AF  
Flat 62 Prospect House SE16 4AF  
Flat 61 Prospect House SE16 4AF  
  
Flat 60 Prospect House SE16 4AF  
Flat 63 Prospect House SE16 4AF  
Flat 66 Prospect House SE16 4AF  
Flat 65 Prospect House SE16 4AF  
Flat 64 Prospect House SE16 4AF  
Flat 75 Prospect House SE16 4AF  
Flat 86 Prospect House SE16 4AF  
Flat 85 Prospect House SE16 4AF  
Flat 84 Prospect House SE16 4AF  
Flat 87 Prospect House SE16 4AF  
Flat 90 Prospect House SE16 4AF  
Flat 89 Prospect House SE16 4AF  
Flat 88 Prospect House SE16 4AF  
Flat 83 Prospect House SE16 4AF  
Flat 78 Prospect House SE16 4AF  
Flat 77 Prospect House SE16 4AF  
Flat 76 Prospect House SE16 4AF  
Flat 79 Prospect House SE16 4AF  
Flat 82 Prospect House SE16 4AF  
Flat 81 Prospect House SE16 4AF  
Flat 80 Prospect House SE16 4AF  
7 Auley House Spa Road SE16 3FE  
Navron House Horns Ln OX29 8NH  
20 Fleming House George Row SE16 4UL  
Bermondsey London SE16 4AE  
Flat 9 130 Spa Road SE16 3FL  
Porter Building London SE16 3FL  
Flat 33 130 Spa Road SE16 3FL  
Flat 122 Bolanachi Building SE16 3EX  
Flat 20 The Porter Building 130 Spa Road SE16 3FL  
Apt 8 The Porter Building Bermondsey SE16 3FL  
312 Southwark Park Road London SE16 2HA  
65 Rouel Road Bermondsey SE16 3SL  
Flat 31 130 Spa Road SE16 3FL  
2 Eldridge Court Dockley Road SE16 3SN  
130 The Porter Building Spa Road SE16 3FL  
87 Oxley Close London SE1 5HF  
3 Eldridge Court Dockley Rd SE16 3SN  
54 Sherwood Gardens London SE16 3jb  
38 Royal Victoria Gardens London SE16 7EN  
Flat 27 130 Spa Road SE16 3FL  
128 Spa Road London SE16 3FL  
56 Southwark Park Road London SE16 3RS  
128 Spa Road London SE16 3FL  
Irving House 161 Jerningham Road SE14 5NJ  
Irving House 161 Jerningham Road SE14 5NJ

**Re-consultation:** n/a

## APPENDIX 2

### Consultation responses received

#### Internal services

Economic Development Team

#### Statutory and non-statutory organisations

Historic England

London Fire & Emergency Planning Authority

London Underground Limited

Metropolitan Police Service (Designing out Crime)

Natural England - London Region & South East Region

Thames Water - Development Planning

#### Neighbours and local groups

Apt 8 The Porter Building Bermondsey SE16 3FL  
Bermondsey London SE16 4AE  
Flat 122 Bolanachi Building SE16 3EX  
Flat 18 130 Spa Road SE16 3FL  
Flat 20 The Porter Building 130 Spa Road SE16 3FL  
Flat 27 130 Spa Road SE16 3FL  
Flat 29 130 Spa Road SE16 3FL  
Flat 31 130 Spa Road SE16 3FL  
Flat 32 130 Spa Road SE16 3FL  
Flat 32 130 Spa Road SE16 3FL  
Flat 33 130 Spa Road SE16 3FL  
Flat 8 Porter Building 130 Spa Road SE16 3FL  
Flat 9 130 Spa Road SE16 3FL  
Irving House 161 Jerningham Road SE14 5NJ  
Irving House 161 Jerningham Road SE14 5NJ  
Navron House Horns Ln OX29 8NH  
Porter Building London SE16 3FL  
Unit 5a Voyager Business Centre SE16 4RP  
128 Spa Road London SE16 3FL  
130 The Porter Building Spa Road SE16 3FL  
2 Eldridge Court Dockley Road SE16 3SN  
20 Fleming House George Row SE16 4UL  
312 Southwark Park Road London SE16 2HA  
38 Royal Victoria Gardens London SE16 7EN  
54 Sherwood Gardens London Se16 3jb  
56 Southwark Park Road London SE16 3RS  
65 Rouel Road Bermondsey SE16 3SL  
65 Rouel Road London SE16 3SL  
65 Rouel Road London SE16 3SL  
7 Auley House Spa Road SE16 3FE  
*87 Oxley Close London SE1 5HF*