

Item No. 7.2	Classification: Open	Date: 14 May 2019	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 18/AP/3551 for: Full Planning Application</p> <p>Address: SOUTHERNWOOD RETAIL PARK, 2 HUMPHREY STREET, LONDON, SE1 5JJ</p> <p>Proposal: (Revised) Hybrid planning application for detailed permission for Phase 1 and outline planning permission for Phase 2 comprising:</p> <p>Application for full planning permission for 'Phase 1' comprising demolition of existing buildings and the erection of a part 9, part 14, part 15, part 48 storey development (plus basement) up to 161.25m AOD, with 940 sqm GIA of (Class A1) retail use, 541 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use, 8671 sqm GIA (Class C1) hotel; 541 (class C3) residential units (51,757 sqm GIA); landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.</p> <p>Application for outline planning permission (with details of internal layouts and external appearance reserved) for 'Phase 2' comprising demolition of existing buildings and the erection of a part 9, part 12, storey development (plus basement) up to 42.80m AOD, with 1049 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use; 183 (Class C3) residential units (17,847sqm GIA), 1141 sqm GIA (Class D2) cinema and the creation of a 475 sqm GIA (Class C1) hotel service area at basement level; landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.</p> <p>The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017</p>		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning		
Application Start Date 01/11/2018		Application Expiry Date 21/02/2019	
Earliest Decision Date 06/12/2018			

RECOMMENDATION

1. That planning permission be granted, subject to conditions and referral to the Mayor of London, referral to the Secretary of State and the applicant entering into an appropriate legal agreement by no later than 31 October 2019. In the event that

Transport for London need to be a signatory to the agreement, this may impact on the deadline date.

2. That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
3. That following issue of the decision it be confirmed that the Director of Planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1)(d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.
4. In the event that the requirements of (a) are not met by 31 October 2019, that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 615 of this report.

BACKGROUND INFORMATION

Site location and description

5. The Southernwood Retail Park is located on the northern side of Old Kent Road, with Rowcross Street to the east, Humphrey Street (B204) to the west and Rolls Road (B204) to the north. It is broadly rectangular in shape and 1.01ha in size.
6. The site is currently occupied by two large single storey retail sheds that are currently occupied by four commercial tenants. DFS and Carpetright occupy the southern retail shed, while Sports Direct and Argos Extra occupy the northern shed. A surface car park provides 175 spaces that is accessible from Humphrey Street.



Junction of Old Kent Road and Humphrey Street . Pedestrian Connections to Burgess Park across the wide roadways are challenging



Rowcross Street - Long blank inactive frontages detract from oversight and public safety



Rolis Road. The main service yard faces residential neighbours

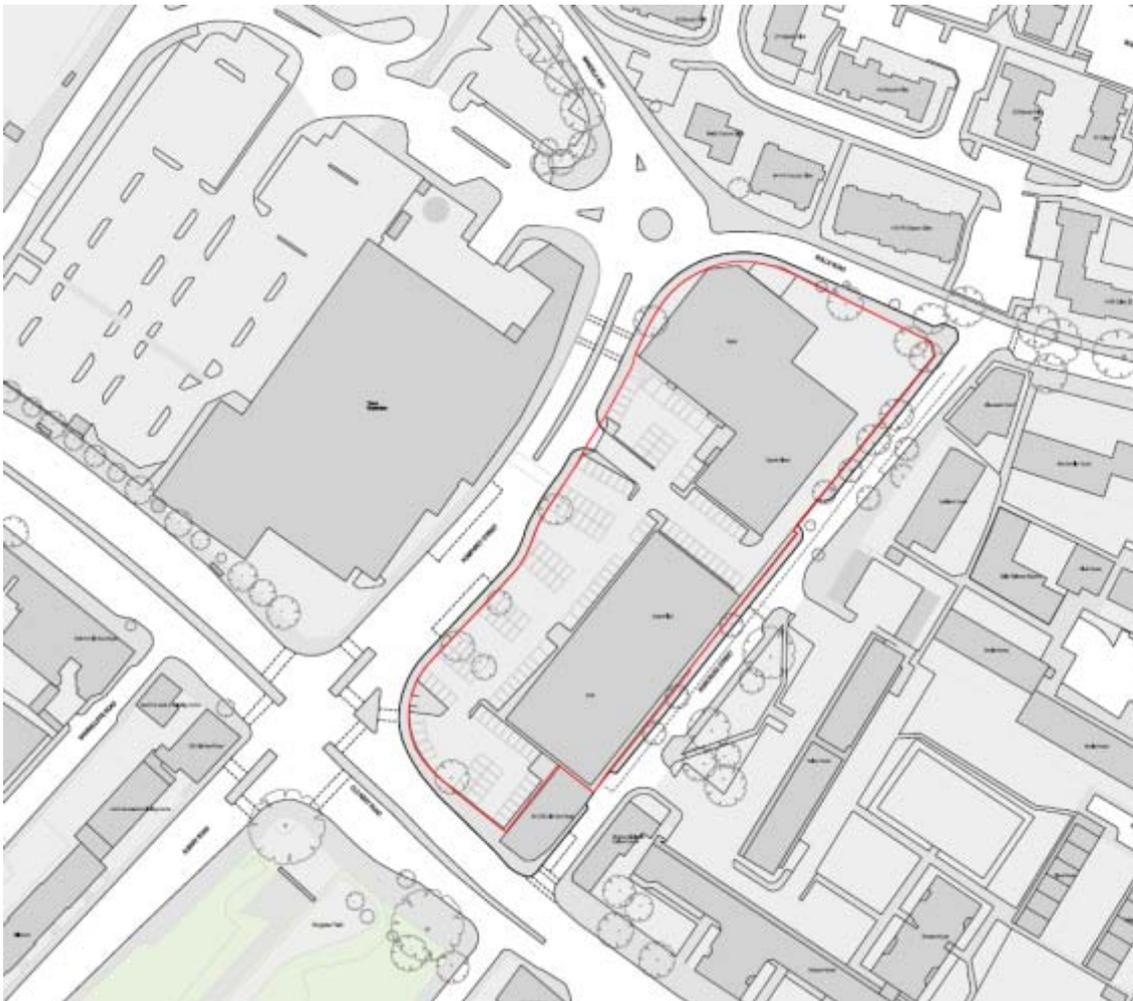


7. The site generally has a PTAL of 4 (Moderate), which is expected to improve to PTAL 6a following completion of the Bakerloo Line extension in 2030.
8. Both retail buildings are of low architectural merit and there is no active frontage along the edge of site to Rolis Road and Rowcross Street where the buildings have extensive blank frontages that are set back from the road with metal boundary railings. The boundary to the Old Kent Road and Humphrey Street is defined by a brick and metal boundary wall approximately one metre high that wraps around the back of the pavement pavements and a number of trees.
9. The service yard to the retail facilities is located on the northern part of the site and is accessed from Humphrey Street.

Surroundings

10. To the west of the site on the western side of Humphrey Street is a further single storey retail store currently occupied Tesco with associated car parking. This site combined with the application site form a significant retail offer within this part of the Old Kent Road.
11. The closest residential occupiers are located opposite the site on the northern side of Rolls Road at Chaucer Drive. Astley House, Lackland House and Gloucester Court that are located to the eastern side of Rowcross Street as part of a predominantly area of housing.
12. Immediately to the south-east corner of the site is 361-363 Old Kent Road, a three-storey building unit with retail on ground (the Pound Plus DIY) and residential accommodation on the upper floors. It is outside the application site. The Old Kent Road Mosque & Islamic Cultural Centre is located at the junction of Rowcross Street and Old Kent Road.
13. The upgraded entrance to Burgess Park is located on the opposite side of Old Kent Road to the south of the site.

Image: Site plan



Details of proposal

14. Planning permission is sought for the following Hybrid development.

Full planning permission for 'Phase 1'

15. Demolition of existing northern retail shed buildings and the erection of a part 9, part 14, part 15, part 48 storey development (plus basement) up to 161.25m AOD, with 940 sqm GIA of (Class A1) retail use, 541 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use, 8671 sqm GIA (Class C1) hotel; 541 (class C3) residential units (51,757 sqm GIA); landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.

Outline planning permission (with details of internal layouts and external appearance reserved) for 'Phase 2'

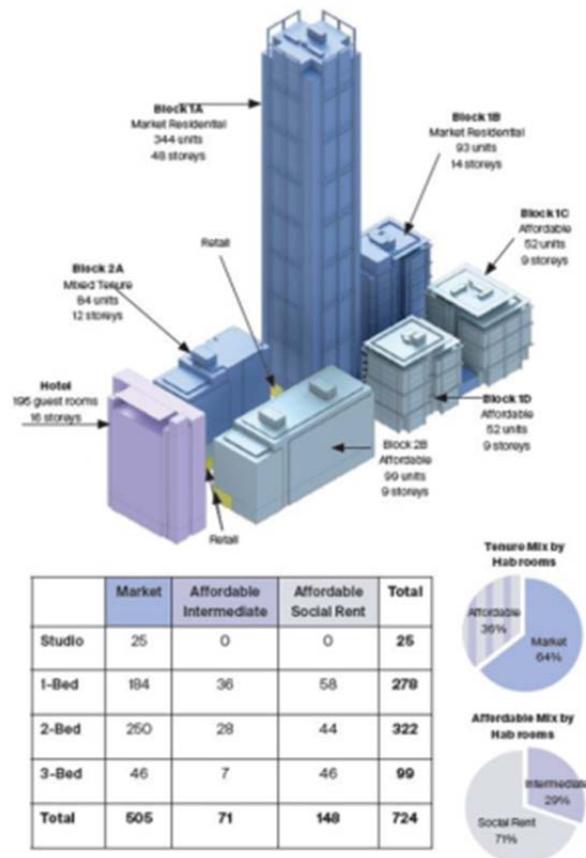
16. Demolition of existing southern retail shed buildings and the erection of a part 9, part 12, storey development (plus basement) up to 42.80m AOD, with 1049 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use; 183 (Class C3) residential units (17,847sqm GIA), 1141 sqm GIA (Class D2) cinema and the creation of a 475 sqm GIA (Class C1) hotel service area at basement level; landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.
17. It should be noted that only details of the internal layouts and external appearance is reserved for 'Phase 2' of the proposed development.

Total quantum of development - Phase 1 and Phase 2

18. In total, the following maximum quantum of development is proposed across the two phases:
- 724 residential units
 - Retail floorspace – Supermarket/Large format: 940 sqm
 - Retail floorspace - Flexible: 1590 sqm
 - Hotel: 8,117sqm
 - Cinema: 1141sqm
19. The scheme will deliver 724 residential units in total, of which 219 will be affordable. This equates to 35.64% of homes will be affordable on a habitable room basis, and exceeds the 35% requirement of the Mayor of London's Affordable Housing SPG and draft Policy P1 of the New Southwark Plan.
20. 10.4% of homes will be intermediate and 25.3% will be social rent on a habitable room basis which is in accordance with the criteria set out in draft Policy P1 of the New Southwark Plan. All of the affordable units being delivered in Phase 1 (104 units) will be social rented units.
21. A breakdown of the total tenure and mix is set out below:

	Market	Affordable	-	Affordable -	Total units
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	units	Intermediate units	Social units	Rent
Studio	25	0	0	25
1-Bed	184	36	58	278
2-Bed	250	28	44	322
3-Bed	46	7	46	99
Total	505	71	148	724

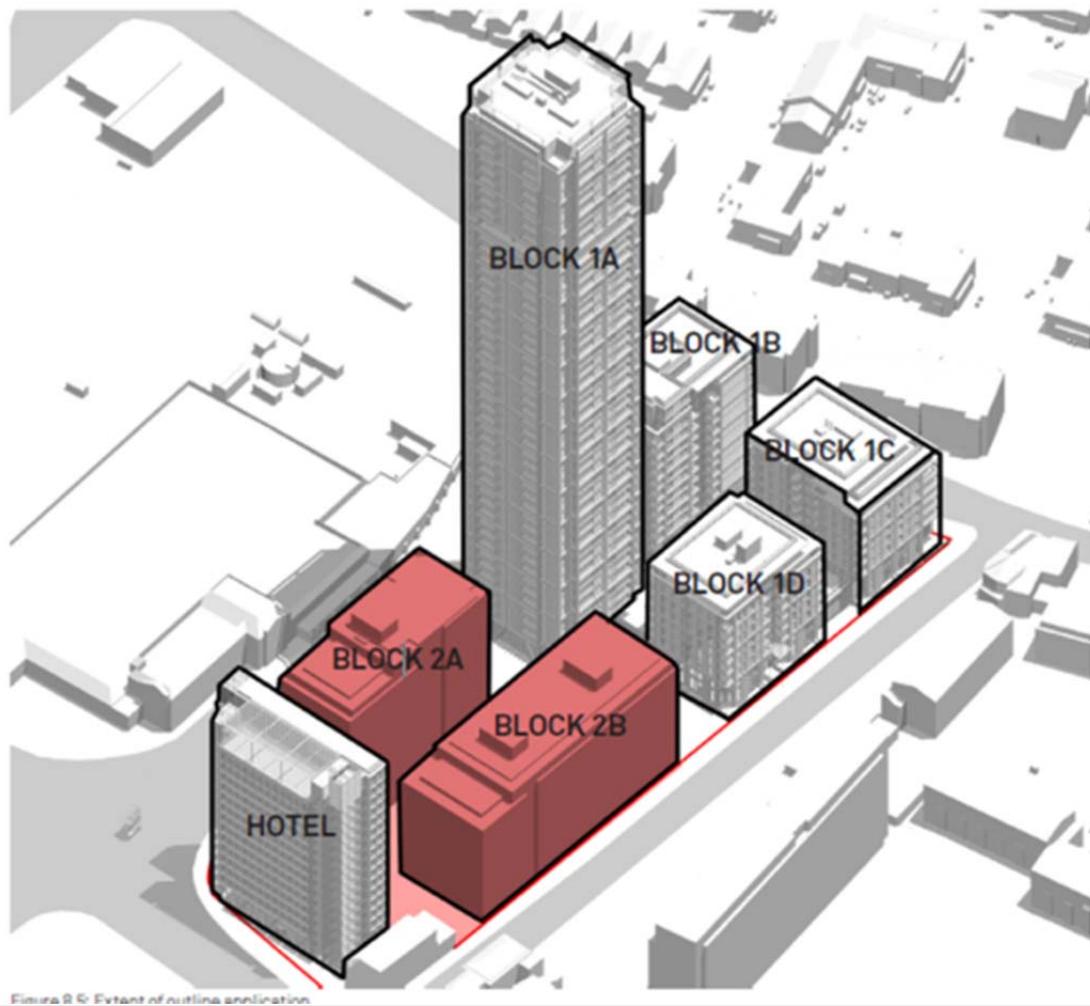


22. The proposal includes 75 adaptable/wheelchair units in total across both phases. 37 will be delivered during Phase 1 and 38 will be delivered during Phase 2.
23. Each unit is planned with external private amenity space in the form of balcony or external terraces.

Phase 1 - Full planning permission

24. The proposed Phase 1 development consists of a tower and 3 pavilion blocks linked by a single storey podium with 438 units with basement and servicing routes accessible from Rolls Road to the north of the site. In addition, a hotel is proposed fronting the Old Kent Road.

Image: Phase 1 and 2 blocks



Block 1A - Mixed use tower

25. Building 1A is a 48 storey tower to be located at the western side of the site fronting Humphrey Street and the new public realm within the site. Rising to a height of 161.25m AOD the tower would provide 344 dual aspect units, with typical floor layouts of eight units per floor, with higher floors above level 36 accommodating a mix of four to six units per floor. Access to the residential floors tower would be provided from Humphrey Street with servicing from the basement. Floor to ceiling heights would be a minimum of 2.6m for all units with private amenity space for each unit. This block would contain solely private units.
26. A flexible retail unit and market lobby is proposed for the ground floor with access provided from the Humphrey Street and new public realm route within the centre of site that links Rowcross Street to Humphrey Street. An internal communal amenity area at upper ground.

Block 1B – Mixed use

27. Building 1B at the corner of Humphrey Street and Rolls Road would be a 14 storey pavilion building rising to 49.45m AOD. In total 94 units are proposed within this building. The ground floor would consist of two flexible commercial units and the residential core accessible from Humphrey Street. Access to the communal

residential podium garden is via the upper ground floor, with individual private amenity space proposed for each unit. The upper two floors step back from the elevations. The typical floor layouts are eight units per core for floors 1 to 10, reducing to 6 and 2 units on the uppermost floors. A roof garden and playspace is also proposed.

28. All units within this building would be private and intermediate tenure.

Block 1C - Residential

29. Building 1C positioned at the corner of Rowcross Street and Rolls Road would be a 9 storey pavilion building rising to 33.73m AODm, and would deliver 52 units with individual private amenity space. The ground and first floors would consist of three maisonette residential units raised above pavement level to ensure good levels of privacy, the residential core for the upper floors and servicing route for the retail units located beneath the podium with access from Rolls Road and egress to Rowcross Street. Access to the communal residential podium garden is also via the upper ground floor. The eastern elevation of the building steps down to 7 storeys, around the height of the existing Astley House across Rowcross Street. The typical floor layouts are seven units per core, reducing to 6 and 4 units on the uppermost floors. A roof garden is proposed.

30. All units within this building would be social rented tenure.

Block 1D - Residential

31. Building 1D positioned on the western side of Rowcross Street and would be also second 9 storey pavilion building rising to 37.03m AOD, and would deliver 52 units. The ground and first floors would consist of four maisonette residential units raised above pavement level to ensure good levels of privacy, and the residential core for the upper floors. Access to the communal residential podium garden is also via the upper ground floor. The eastern elevation of the building steps down to 7 storeys, around the height of the existing Astley House across Rowcross Street. The typical floor layouts are seven units per core, reducing to 6 and 4 units on the uppermost floors. A roof garden and playspace is also proposed.

32. All units within this building would be social rent and intermediate tenure.

Podium

33. A single storey podium would link buildings Blocks 1A, 1B, 1C and 1 and consist of a large supermarket retail unit beneath the private communal garden at Upper Ground Floor that would be accessible to all residential units within the four blocks. Also at ground floor level to the north and west of the podium is the commercial servicing route and back of house functions including retail holding areas. No customer car parking is proposed for the retail units.

Hotel

34. The final building proposed for Phase 1 is a 16 storey hotel at 56.50m AOD. This would offer 195 rooms with ancillary active uses at ground floor and a top-floor restaurant/bar. It would provide an active frontage to the Old Kent Road and generate footfall and activity to that will promote vibrant mixed-use development on

the site in advance of Phase 2 being developed.

35. The hotel building would extend across the length of the Old Kent Road frontage, retaining a strong built edge. The depth of the building is slender in views along Old Kent Road, with the building line is set back from the edge of the existing pavement to provide a wider footway.

Table: Phase 1 Proposed development building heights

Block	No. of floors	Building height (m) AOD
1A - Tower	48	161.25
1B	14	49.45
1C	9	33.73
1D	9	37.032
Hotel	16	56.50

Table: Existing Phase 1 floorspace

Units	Use class	Floorspace (GIA)
Argos and Sports Direct	A1	2,099sqm
Total		2,099sqm

Table: Proposed Phase 1 floorspace

Use Class	Floorspace (GIA)
Retail Supermarket (Class A1)	910sqm
High Street commercial (Class A1-A3)	541sqm
Hotel (Class C1)	8117sqm
Total	9568 sqm

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

Table: Phase 1 Residential tenure

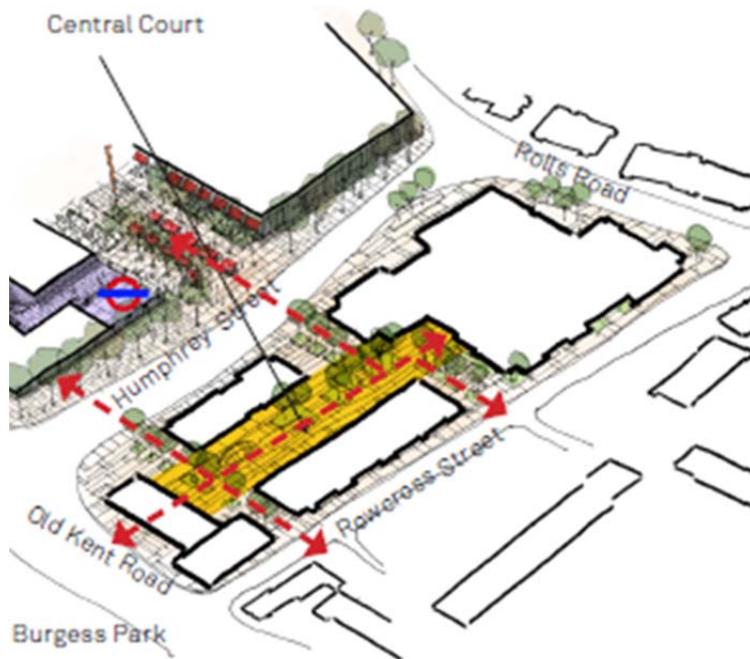
Block	Social	Intermediate	Private	Total
Block 1A	0	16	344	344
Block 1B	0	0	93	93
Block 1C	52	0	0	52
Block 1D	52	0	0	52
Total	104	16	437	542

Landscaping and open space

37. New hard and soft landscaped areas are proposed to provide public and private amenity spaces for the new and existing residential and business communities.

38. The proposed development would deliver a significant element of new civic public realm within the centre of the site that would include a central square and provide a new east/west link from Rowcross Street to Humphrey Street through the centre of the site. There would be no vehicle movement across the site.

Image: Central Square and pedestrian links



39. A residential podium garden and a series of roof gardens are also proposed. The public square would be fully accessible to the public. The roof top gardens on Blocks 1B, 1C and 1D, would be limited to residential access only.

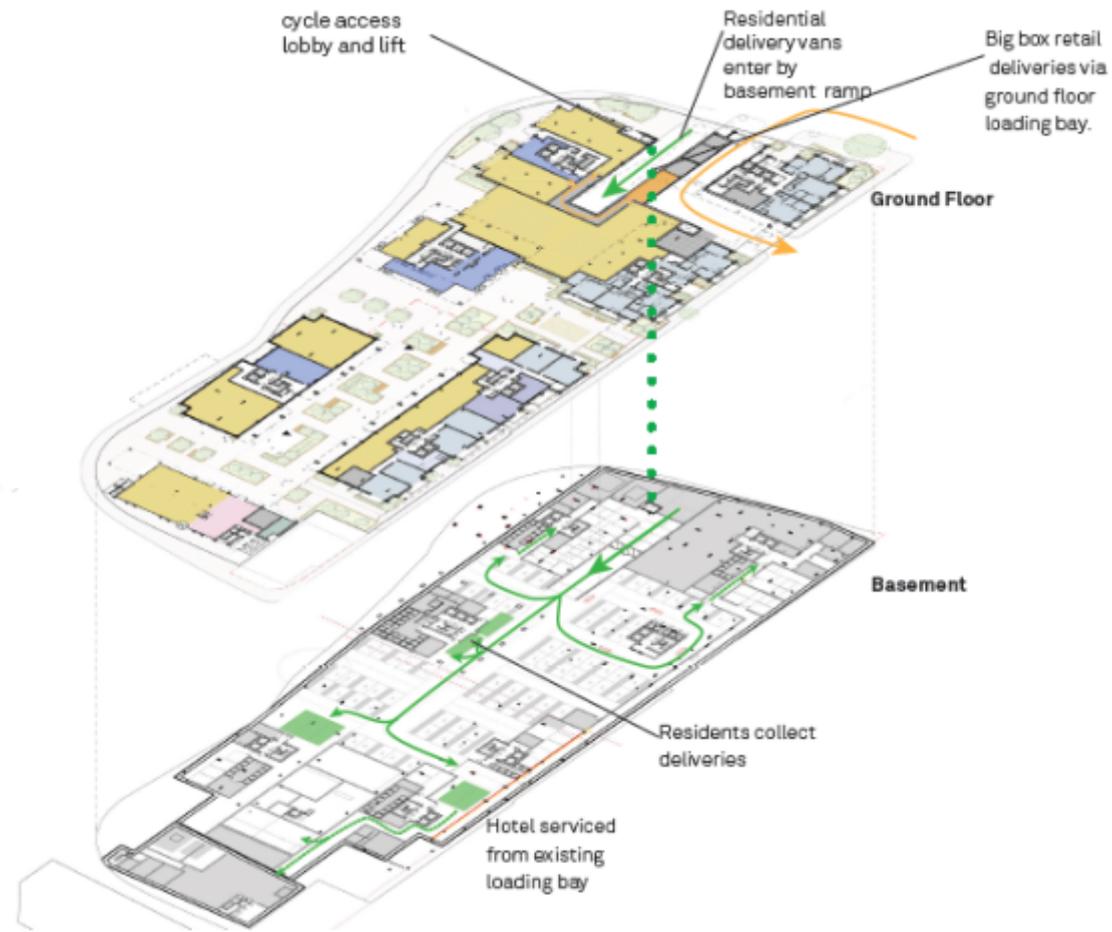
Image: Podium garden



Servicing, parking and access

40. A single basement provides servicing to the residential units above access to by a covered two way ramp from Rolls Road. The basement provides smaller delivery parking bays, electric disabled car parking bays, waste secure residential and commercial cycle parking and access to plant. Disabled car parking spaces would be provided at basement level. The proposed car parking spaces would be used to serve the accessible residential units. No further internal or external residential car parking is proposed. Street level parking would be limited to drop off/delivery, blue badge and car club parking spaces, potentially to Rowcross Street.
41. A ground floor retail servicing route for large delivery vehicles is located beneath the podium block with access from Rolls Road and egress to Rowcross Street. This would service Phase 1 retail units. Smaller flexible Phase 2 retail units would be serviced from the enlarged basement delivered in Phase.

Image: Phase 1 Basement



42. Temporary hotel servicing would be provided from the retained commercial car parking until Phase 2 is delivered where the servicing would take place from the basement. No guest car parking is proposed.
43. The proposed development has also been designed to promote the use of cycling. The development would provide 893 short and term cycle parking spaces at ground and basement level.
44. It is stated by the applicant that Phase 1 development would commence construction in 2019 and schedule to be open and operational in 2021/2022, notwithstanding matters arising from the planning and delivery of the Bakerloo Line Extension.

Phase 1 Scheme amendments

45. The following amendments were subject to further reconsultation:

Residential

Block 1A

- Relocation of the intermediate penthouse level from level 37 to level 45, and associated articulation of the top of the tower such that a taller inset 'apex' element than in the previous design would be created.

- Changes to the articulation of the frame, such that it would extend without interruption through the height of the tower; horizontal elements would be provided at six storey intervals rather than the previous three storey intervals; and the top of the frame would extend to a slightly greater height than previously (although no higher than the previous maximum height of the building).
- The introduction of red coloured soffits to balconies.

Block 1B

- Alteration in building massing to increase the size of the podium decking.
- Alteration in building layout, altering the unit mix

Block 1C

- Changes to the articulation of the frame, such that it would extend without interruption through the height of the tower; horizontal elements would be provided at six storey intervals rather than the previous three storey intervals; and the top of the frame would extend to a slightly greater height than previously (although no higher than the previous maximum height of the building).
- Introduction of brick materials.

Block 1D

- Alteration in building layout and tenure mix, increasing the ratio of dual aspect units.
- Introduction of brick materials.

Hotel Block

- Removal of diagonal cross braced elements at ground floor level.
- The introduction of coloured glazed brick to the hotel façade. From the west, a blue and green palette is proposed to address the hotel's relationship with Burgess Park and from the east; a warm palette is proposed to address the arrival to a new town centre proposed by the AAP on the Old Kent Road.
- The introduction of warm red tones on the hotel façade are characteristic of the historic public buildings on the Old Kent Road.

Retail

- The introduction of an additional 96 sqm of Class A1 retail floorspace in Phase 1.
- The introduction of an additional 64 sqm of Class A1/A2/A3 floorspace in Phase 1.

Public Realm

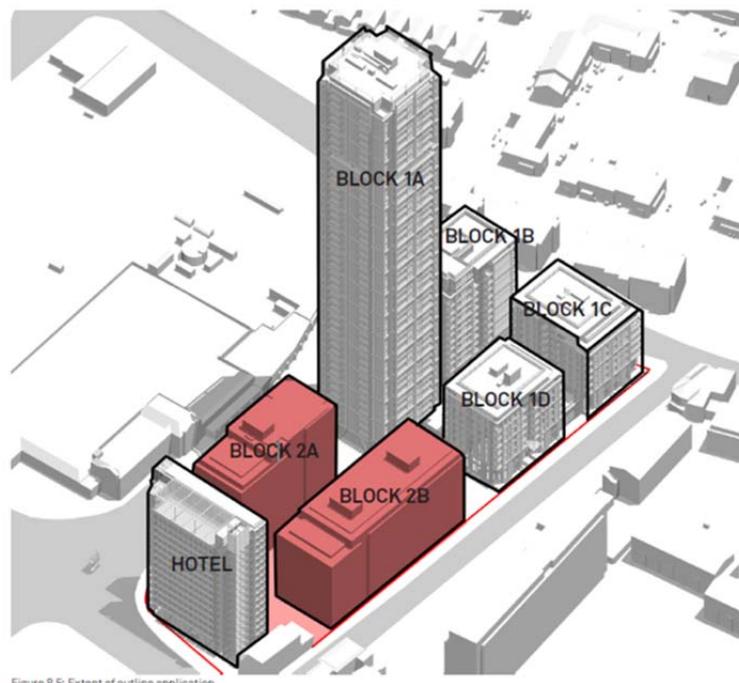
- Increase in podium decking area to 1,100 sqm.
- The introduction of a coloured feature wall within the public realm. Colour will be drawn from the elevations of the hotel and will form part of the detail of the public spaces and routes.
- Amendments to the proposed landscaping scheme.
- The introduction of a porous canopy on the southern side of the hotel block, with 3m high porous fins.
- The introduction of a line of 6m high pleached trees the site's eastern boundary.

- The introduction of a temporary 2m high wall between Phase 1 and the existing buildings.

Phase 2 – Outline planning permission

46. The outline development proposed for Phase 2 is formed of 2 individual mixed-use buildings, 2A and 2B, and a basement cinema, alongside further public realm and new route through the site.
47. The proposed Phase 2 development sits between both Phase 1 developments, Blocks 1A, 1B, 1C and 1D to the northern end of the site, and the hotel to the southern end.
48. Matters reserved for later Reserved Matters planning applications for these include residential layout and elevational design. The basement and ground floors of these buildings have been subject to detailed design and form part of this application.
49. The design code for Phase 2 reserved matters is set out in Chapter 11.3 of the Design and Access Statement. Parameters for the following criteria have been defined:
 - Maximum building heights
 - Footprint and building tops
 - General Appearance
 - Openings and Balconies
 - Base of buildings
 - Materials Palette

Image: Phase 2 Proposed site layout



Block 2A

50. Block 2A' comprises a 12-storey residential block of 45.80m AOD, with 84 residential units and flexible retail at ground floor fronting Humphrey Street to the west and a new central public square to the east. This block would contain private and Intermediate units.

Building 2B

51. Block 2B comprises a 9-storey residential block rising to 36.86m AOD, with 99 residential units and flexible retail at ground floor fronting a new central public square to the east. This block would be entirely residential to Rowcross Street. This block would contain Social Rented and Intermediate affordable units.

Cinema

52. A new two-screen cinema is proposed for the basement with access from a small entrance pavilion within the central square located between Blocks 2A and 2B.

Table: Phase 2 Proposed development building heights

Block	No. of floors	Building height (m) AOD
2A	12	45.80
2B	9	36.86
Cinema	Basement	n/a - Entrance pavilion height to be confirmed at reserved matters stage

Table: Existing Phase 1 floorspace

Unit	Use class	Floorspace (GIA)
Carpet Right and DFs	A1	1,873sqm
Total		1,873sqm

Table: Proposed Phase 2 floorspace

Use Class	Floorspace (GIA)
Retail flexible (Class A1-A3)	1,049sqm
Cinema (D2)	657sqm
Total	1,706sqm

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

Table: Phase 2 Residential tenure

Block	Social	Intermediate	Private	Total
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Block 2A	0	16	68	84
Block 2B	55	44	0	99
Total	55	60	68	183

Landscaping and open space

54. New hard and soft landscaped areas are again proposed to provide public and private amenity spaces for the new and existing residential and business communities.
55. The proposed development would deliver the final, yet significant areas of the proposed public central square and connect with the public realm delivered in Phase 1 to the north. A second pedestrian link from Humphrey Street to Rowcross Street is proposed to the northern elevation of the Phase 1 hotel that would also connect to the central square. The communal roof gardens of Blocks 2A and Block 2B would be for residents use only.

Servicing, parking and access

56. Servicing and parking for the residential, commercial and cinema uses would be delivered by an extended basement, with access from the two-way ramp on Rolls Road.
57. In terms of delivery, it is intended that Phase 2 would commence construction in May 2030, completing in April 2033.

Pre-application advice

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

Planning history of adjoining sites

59. The council has received a number of planning applications recently in the Old Kent Road Opportunity Area. These include the following.
60. A18/AP/0897 Ruby Triangle Site, Land bounded by Old Kent Road, Ruby Street and Sandgate Street
Application type: FULL
Full planning permission is sought for demolition of existing buildings and structures on the site, and redevelopment consisting of three buildings at maximum heights of 17 storeys (including mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (including mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,152 residential dwellings (Class C3), retail, business and community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation

of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works.

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

61. 17/AP/2773 Malt Street Regeneration Site, land bounded by Bianca Road, Latona Road, Haymerle Road, Frensham Street and Malt Street (referred to in the report as Malt Street)

Application Type: FULL

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

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

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

Decision: Yet to be determined

62. 17/AP/4596 13-14 Frensham Street, (Nyes Wharf)

Application Type: FULL

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

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

63. 18/AP/3284 596-608 Old Kent Road and Land at Livesey Place (referred to in the report as Civic Centre)

Application type: FULL

Mixed-use redevelopment comprising the demolition of all existing buildings and structures (listed mural to be removed and stored prior to demolition, and incorporated into proposed development); construction of three buildings arranged around a central plinth ranging in height from 10 to 38 storeys (maximum height +144.2m AOD) above single basement, ground and mezzanines floors, to provide a range of uses including 372 residential units (Use Class C3), place of worship (Use Class D1), retail (Use

Classes A1-A4), and office / light industrial (Use Classes B1(a)/B1(c)); means of access, public realm and landscaping works, parking and cycle storage provision, energy centre / plant and servicing areas, and associated ancillary works.

Decision: Yet to be determined

64. 17/AP/4612 49-53 Glengall Road

Application type: FULL

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

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

65. 18/AP/3246 Land at Cantium Retail Park 520 Old Kent Road SE1 5BA

Application type: FULL

Demolition of existing buildings and redevelopment of the site to provide a new basement level and buildings ranging from 3 to 48 storeys in height (max height 159.05m above ground level) comprising up to 1,113 residential units (Class C3), up to 5,659 sq.m of office floorspace (Class B1(a)), up to 2,228 sq. m of retail floorspace (Class A1), up to 2,336 sq. m of flexible space including use within Classes A1, A3, B1(a), B1(b), D1, D2 and / or Sui Generis (Theatre) within Block B and up to 596 sq. m of flexible space within Classes A1, A2 and / or A3 within Block C together with associated access, car parking, landscaping and infrastructure works.

Decision: Resolution to grant, subject to a legal agreement and referral to the Mayor of London (5 Sept 2019).

66. 18/AP/1431 MUSLIM ASSOCIATION OF NIGERIA, 365 OLD KENT ROAD, LONDON, SE1 5JH

Application type: FULL

Demolition of existing building and the erection of a 6 storey building (plus basement) containing an Islamic Cultural Centre for religious, educational, community and leisure use, including 1 service parking space and retail uses on ground floor

Decision: Resolution to grant, subject to a legal agreement.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Principle of the proposed development in terms of land use;
- Environmental impact assessment;
- Affordable housing;
- Design, layout, landscaping, heritage assets and tall buildings including views;
- Impact on trees;

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

Legal context

68. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007.
69. There are also specific statutory duties in respect of the public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

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

Planning Policy Designations

- 71.
- The Old Kent Road Opportunity Area
 - The Urban Density Zone
 - The Bermondsey Archaeological Priority Area
 - The Air Quality Management Area
 - The site is allocated within the draft Old Kent Road Area Action Plan (OKR AAP) as forming part of proposal site OKR 10.

- Public transport accessibility level of 3 to 4 on a scale of 1-6 where 1 is the lowest level and 6 represents the highest.
- The London View Management Framework views likely to be impacted upon by the proposed development are 23A.1 from the Serpentine, 6A.1 from Blackheath Point, 2A.1 from Parliament Hill and 3A.1 from Kenwood.

72. There are no statutory listed buildings on the application site. The closest listed buildings are Grade II listed:

- Former Fire Station;
- 29 and 31 Cobourg Road;
- 47 - 63 (odd) Cobourg Road;
- New Peckham mosque (former church of St Mark);
- Lord Nelson public house;
- 16 – 64 (even) Trafalgar Avenue;
- 25 – 43 Trafalgar Avenue;
- 1 – 35 (odd) Glengall Road;
- 24-38 (even) Glengall Road;
- 1-9 Glengall Terrace; and
- Phoenix Primary School (formerly Evelyn Lowe School)

73. The application site is not located within or adjacent to a conservation area. There are however, a number of conservation areas in the immediate vicinity of the site, to the south on the other side of the Old Kent Road: the Coburg Road Conservation Area; the Trafalgar Avenue Conservation Area; and the Glengall Road Conservation Area. The Thorburn Square Conservation Area, the Liverpool Grove Conservation Area, the Pages Walk Conservation Area, the Bermondsey Street Conservation Area and the Peckham Hill Street Conservation Area are all within 1km of the application site, meaning that their settings could be impacted upon by the proposed development

74. The site sits above the preferred and indicative route of the running tunnels of the Bakerloo Line Extension that would run parallel to the Old Kent Road beneath the southern end of the site. The site has the potential to be the location for Old Kent Road 1 station, but it is not the current preferred location.

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

National Planning Policy Framework (the Framework)

76. National planning policy is set out in the revised National Planning Policy Framework ('the NPPF'), published 2019. The NPPF focuses on a presumption in favour of sustainable development, of which there are three strands; economic, social and environmental. The core planning principles include, amongst others, the requirement to 'drive and support development'.

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

in this report.

- Section 2 - Achieving sustainable development
- Section 5 - Delivering a sufficient supply of homes
- Section 6 - Building a strong, competitive economy
- Section 7 - Ensuring the vitality of town centres
- Section 8 - Promoting healthy and safe communities
- Section 9 - Promoting sustainable transport
- Section 11 - Making effective use of land
- Section 12 - Achieving well-designed places
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- Section 15 - Conserving and enhancing the natural environment
- Section 16 - Conserving and enhancing the historic environment

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

The London Plan 2016

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

- Policy 3.3 Increasing housing supply
- Policy 3.5 Quality and design of housing developments
- Policy 3.6 Children and young people's play and informal recreation facilities
- Policy 3.8 Housing choice
- Policy 3.9 Mixed and balanced communities
- Policy 3.10 Definition of affordable housing
- Policy 3.11 Affordable housing targets
- Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- Policy 3.13 Affordable housing thresholds
- Policy 4.3 Mixed use development and offices
- Policy 4.5 London's visitor infrastructure
- Policy 5.7 Renewable energy
- Policy 5.8 Innovative energy technologies
- Policy 5.11 Green roofs and development site environs
- Policy 5.12 Flood risk management
- Policy 5.13 Sustainable drainage
- Policy 5.21 Contaminated land
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.13 Parking
- Policy 7.2 An inclusive environment
- Policy 7.3 Designing out crime
- Policy 7.4 Local character
- Policy 7.6 Architecture
- Policy 7.8 Heritage assets and archaeology
- Policy 7.21 Trees and woodlands
- Policy 8.2 Planning obligations
- Policy 8.3 Community infrastructure levy

80. The London Plan 2016 identifies the Old Kent Road as an Opportunity Area with “significant potential for residential – led development along the Old Kent Road corridor” and identified an indicative employment capacity of 1,000 and a minimum of 2,500 new homes. Opportunity areas are described in the London Plan 2016 as London’s major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.
81. Policy 2.13 in the London Plan 2016 sets out the strategic policy for the development and intensification of opportunity areas. Annex 1 includes an indicative capacity for Old Kent Road of 2,500 homes and 1,000 jobs and supports the development of a planning framework to realise the area’s full growth potential. It goes on to state that the employment and minimum homes figures should be explored further and refined in a planning framework for the area and through a review of the Strategic Industrial Location and capacity to accommodate a phased rationalisation of its functions in the opportunity area or a provision elsewhere.

Core Strategy 2011

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

Strategic policy 1 - Sustainable development
Strategic policy 2 - Sustainable transport
Strategic policy 3 - Shopping, leisure and entertainment
Strategic policy 4 - Places for learning, enjoyment and healthy lifestyles
Strategic policy 5 - Providing new homes
Strategic policy 6 - Homes for people on different incomes
Strategic policy 7 - Family homes
Strategic policy 9 - Student homes
Strategic policy 10 - Jobs and businesses
Strategic policy 11 - Open spaces and wildlife
Strategic policy 12 - Design and conservation
Strategic policy 13 - High environmental standards
Strategic policy 14 - Implementation and delivery

Southwark Plan 2007 (July) - saved policies

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

1.1 - Access to employment opportunities
1.7 - Development within town and local centres
1.11 - Arts, culture and tourism uses
1.12 - Hotels
2.1 - Enhancement of Community Facilities
2.2 - Provision of New Community Facilities

- 2.5 - Planning obligations
- 3.1 - Environmental effects
- 3.2 - Protection of amenity
- 3.3 - Sustainability assessment
- 3.4 - Energy efficiency
- 3.6 - Air quality
- 3.7 - Waste reduction
- 3.9 - Water
- 3.11 - Efficient use of land
- 3.12 - Quality in design
- 3.13 - Urban design
- 3.14 - Designing out crime
- 3.15 - Conservation of the Historic Environment
- 3.18 – Setting of Listed Buildings, Conservation Areas and World Heritage Sites
- 3.19 – Archaeology
- 3.20 – Tall Buildings
- 3.22 – Important Local Views
- 3.28 - Biodiversity
- 4.2 - Quality of residential accommodation
- 4.3 - Mix of dwellings
- 4.4 - Affordable housing
- 4.5 - Wheelchair affordable housing
- 5.2 - Transport impacts
- 5.3 - Walking and cycling
- 5.6 - Car parking
- 5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents (SPDs)

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

Greater London Authority Supplementary Guidance

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

Emerging policy

Draft New London Plan

- 86. 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. Further suggested changes to the Plan have been proposed by the Mayor and published in response to the EIP Panel of Inspector's matters at the examination sessions. The EIP will continue until May 2019 and until the London Plan reaches formal adoption it can only be attributed limited weight. The draft New London Plan identified the Old Kent Road as having a minimum capacity for housing of 12,000 and a jobs target of 5,000.

Old Kent Road Area Action Plan (OKR AAP)

87. The council is preparing an Area Action Plan/Opportunity Area Planning Framework for Old Kent Road (AAP/OAPF) which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. Consultation has been underway for 3 years, with a first draft published in 2016. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2017 and concluded consultation on 21st March 2018. As the document is still in draft form, it can only be attributed very limited weight.
88. Whilst acknowledging this very limited weight, members are advised that the draft OKR AAP places the application site within the proposed Action Area Core, and within proposal site OKR4 which covers the area of the Tesco site and Southernwood retail site. Requirements for this allocation site include requiring existing retail floorspace to be replaced and frontages along Old Kent Road activated through provision of retail (A Class), business (B Class) or community uses (D Class). Also relevant to this specific site are the requirements to provide new public realm.

New Southwark Plan (NSP)

89. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 is being consulted on until 17 May 2019. It is anticipated that the plan will be adopted in late 2019 following an Examination in public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

Principle of development in terms of land use

90. The National Planning Policy Framework offers a number of key principles that emphasise a focus on driving and supporting sustainable economic development to facilitate the delivery of new homes, office and commercial business units, infrastructure and prosperous centres. The application site is located on a site that is earmarked to be designated as a town centre. It is also within the Old Kent Road Opportunity Area. In locations such as these, the London Plan and Southwark Plan policies strive for higher density, high quality mixed use developments which assist in addressing the need for new homes and ranges of employment opportunities.

91. The site is also identified as falling within proposal site OKR4 within the draft OKR AAP. The draft site allocation states that redevelopment on this site must:
- Replace existing retail floorspace (A use class), including a new supermarket; and
 - Provide leisure facilities (D use class); and
 - Provide office space (B1a use class), consistent with the building and land use types shown; and
 - Provide housing; and
 - Potentially provide a tube station; and
 - Provide a new urban square visible from Old Kent Road; and
 - Provide new pedestrian routes into the urban square at the centre of the site; and
 - Remove the Dunton Road, Mandela Way and Humphrey Street gyratory to improve routes and provide a green and pleasant environment for people walking and cycling; and
 - Improve pedestrian crossing of the Old Kent Road; and
 - Provide on-site servicing.
92. The AAP states that the indicative capacity for OKR4 which also includes the Tesco site is 1,240 homes and 680 jobs. There are approximately 165 jobs currently within OKR4.
93. The existing retail warehouses and car parking are outdated and do not maximise the development potential for a Town Centre location.
94. The site does not include any existing employment (Class B) uses and is not identified as a 'Strategic' or 'Preferred Industrial Location'.

Assessment of main town centre uses

95. The NPPF, London Plan and Strategic Policy 3 of the Core Strategy, all require applications for "town centre" uses outside a defined centre to demonstrate a sequential approach to site selection and that there are no unacceptable impacts to any defined town centres.
96. The NPPF (2018) defines Main Town Centre Uses as: "Retail development (including warehouse clubs and factory outlet centres), leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."
97. The site is not currently within a designated town centre however, it falls within the boundary of one of the two Old Kent Road 'district centres' the council are proposing within the draft New Southwark Plan and draft OKR AAP.
98. The proposal includes the provision of up to 11,788 sq.m. (GIA) of town centre uses as set out in the table below.

Table: Proposed Use Classes

Use Class	Floorspace GIA (sqm)
Retail supermarket (Use Class A1)	940
Flexible commercial (Use Classes A1-A3)	1,590
Hotel (Use Class C1)	8,117
Cinema (D2)	657
Total	11,788

99. The objective of the two new town centres is to create a more cohesive town centre that better meets the needs of existing and new residents and workers in the local area. The new district town centre that the site would form part would include retail, leisure, entertainment and recreation facilities in a significantly more attractive and accessible environment.
100. It follows that the site would form part of the defined town centre once the draft OKR AAP is adopted and the uses would help to support and contribute to the vitality and viability of that new centre.
101. The NPPF states that when assessing applications for retail, leisure and office development outside of town centres, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold, or if there is no locally set threshold, the default threshold is 2,500 sq.m. Southwark has no local threshold. London Plan Policy 4.7 and draft London Plan policy SD7 also requires an impact assessment. The impact assessment should test the impact of the proposal on existing, committed and planned public and private investment in centres in the catchment area of the proposal; and the impact on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years ahead.
102. Strategic Policy 3 of the Southwark Core Strategy relates specifically to shopping, leisure and entertainment and aims to maintain Southwark's network of successful designated town centres. As part of this, the policy identifies a hierarchy of town and local centres, reflecting their size and role in the borough. In the adopted Core Strategy, the Old Kent Road is not identified as one of these designated town centres, despite the significant retail offer that it provides. The policy then goes on to identify the tests set out in national planning policy and the London Plan for new shopping and leisure space which are proposed outside designated town and local centres.
103. Southwark Plan Saved Policy 1.7 relates to development within town centres, and states that most new development for town centre uses should be accommodated within existing town centres and local centres. Policy 1.8 (Location of retail outside town centres) was not found to be in conformity with the NPPF and was accordingly not saved when the plan was revised in 2013.
104. The Southwark Retail Study was published in 2015 to provide a robust and credible evidence base to inform the council's work on the New Southwark Plan. This identified that Old Kent Road is the dominant destination for comparison shopping in the borough, and that as it is not currently a designated town centre it is vulnerable. It identifies that the area has been designated as an Opportunity Area and that there is a potential for a new town and/or local centres.

105. Acknowledging its limited weight, it is worth noting that emerging Policy P30, Town and Local Centres of the draft NSP proposes the Old Kent Road as two district centres. It also states that town centre uses will be permitted in town centres where:
- The scale and nature is appropriate to the role and catchment of the centre; and
 - A Use Classes are retained or replaced by an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and
 - The development would not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the character of the area; and
 - The development provides an active use at ground floor in locations with high footfall; and
 - Large schemes for town centre uses that are 1,000 sqm or more provide public toilets, public drinking fountains and public seating.
106. In terms of the allocation sites identified in the draft NSP, the application site is contained within the boundary of NSP58.
107. The NSP states that development here should provide new homes, retail, community uses, employment uses as well as public open space and improved links to Burgess Park. The site may also provide a hotel and has the potential to host a new underground station as part of the Bakerloo Line Extension.
108. Again, acknowledging its very limited weight, draft OKR AAP Policy AAP 7, Town Centres, Leisure and Entertainment, identifies the site as falling in a district centre and identifies the uses that would be appropriate, including retail, community, leisure, cultural and offices above shops. Draft policy AAP6, Business and Workspace – The Bow Tie, requires an innovative mix of uses including light industrial, offices, manufacturing, distribution and creative workspaces.
109. It is clear therefore that emerging policy and the existing evidence base for the Old Kent Opportunity Road area support mixed use development and the designation of the Old Kent Road as a high street and town centre. Nonetheless, and in recognition of the limited weight of this emerging policy, the applicant has carried out a sequential test and retail impact assessment of the proposed development.
110. The applicants' sequential test demonstrates that the proposed scheme is in the best location to realise the delivery of a key strategic regeneration site within the opportunity area, and would sufficiently serve and benefit the local community and intended customers. This approach complies with the London Plan, the Draft OKR AAP, and New Southwark Plan.

This is because of the following factors:

- The proposed development is based on the application site being located within Old Kent Road Opportunity Area which is identified as a preferable location for future growth, residential intensification and new town centre uses. The proposal, adjacent to a proposed Bakerloo Line Extension underground station, would provide a broader mix of town centre uses than the uses currently offered, which would assist in achieving a 'District Town Centre'

designation within the London hierarchy of centres with Southwark and in accordance with the Draft London Plan, Draft OKR AAP, and emerging New Southwark Plan.

- The suitability, availability, and viability of sites should be considered, with particular regard to “the nature of the need that is to be addressed” when development proposals are assessed. In this respect, it is considered unsuitable to consider the proposed development in another location as it would be contrary to the strategic and local regeneration priorities for the borough, and it would not be serve the purpose it was designed to achieve.
- The proposed location of this mixed-use scheme aligns with development strategy of the draft OKR AAP and also emerging New Southwark Plan which seeks to allocate the site within a District Town Centre which, supported by the conclusions of the Retail Study (2015), is considered to be a suitable, viable, and available location for town centre uses over the relevant plan periods. The Council's approach to designate a new centre complies with the London Plan, which states that it is appropriate to do so, “particularly in opportunity areas identified for significant levels of mixed use development including town centre uses such as retail or leisure.”
- The proposed scheme aligns with the draft OKR AAP's vision to redevelop lower density retail sites to create new hubs around proposed BLE stations, providing a new focal point and critical mass of facilities and broader mix of town centre uses. It also conforms to the aspirations of site allocation OKR4 to, “transform this car dominated retail area to make it a vibrant hub on Old Kent Road”.
- Furthermore, the proposed development would not have any impact on existing, committed or planned investment in any defined centres. Conversely, the proposal would facilitate significant private sector investment would deliver physical and economic regeneration of the application site.

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

112. The demolition of the two existing retail sheds proposal would result in the loss of 3972sqm. of existing retail floorspace. 2530sqm would be reprovided consisting of 940sqm of retail supermarket (A1) and 1590sqm of flexible retail floorspace (A1-A3). This would still represent a net loss of 1442sqm retail floorspace. However, the overall quantum of commercial or employment generating floorspace proposed would be 11,788sqm including 8,117sqm for a hotel use (C1) and cinema 1,141sqm (D2), resulting in the delivery of mix of town centre uses that create a robust and sustainable town centre offer in comparison to the existing offer on site.

113. The existing retail units with extensive surface car parking represents an inefficient use of this out of town centre brownfield site and its loss does not raise any strategic concerns.

114. So, whilst the existing land use is not replicated, the flexibility of different Use Classes in this scheme enhances the development from a town centre perspective. As the new

floorspace would provide a mix of retail, hotel and cinema, this combines to reinforce the role of Old Kent Road as a town centre and significantly increases the intensity and number of employment opportunities available. Therefore the land uses of this development are supported.

Independent retail

115. Draft NSP Policy 28 and London Plan policy 4.9 Local Shops state that development must incorporate well designed and flexible units suitable for small and independent businesses. It has been agreed with the applicant that 10% of the flexible retail space (156sqm) would be secured for smaller companies who currently have no more than three retail outlets, so as to ensure they would be recognisably independent, with a marketing strategy to attract these smaller independent companies. This would ensure that the development would offer a different kind of retail/commercial use.

Re-instatement of frontage to the Old Kent Road

116. The proposed layout of the site would re-establish a traditional “high street” frontage along Old Kent Road as well as increasing the depth of the high street offer along Humphrey Street, in accordance with the draft OKR AAP aspirations. The ground floor of the proposed hotel has been designed to have active frontages to the corridor and to the central square behind, with visual links through the reception and lobby.
117. Additional “High Street” commercial floorspace would be located along Humphrey Street at the bases of Block 1A, Block 1B, Block 2A as well as the entrance to the retail supermarket space. The proposed central square would benefit from “High Street” frontages at the bases of Blocks 2A and 2B in conjunction with the cinema entrance. This series of spaces would deliver a range of active high street frontages that would deliver a true town centre experience.

Hotel

118. Saved policy 1.12 of the Southwark Plan states that hotels will be encouraged in areas with high public transport accessibility, but that they will not be permitted where they would result in an over dominance of visitor accommodation in the locality. Strategic Policy 10 - Jobs and businesses of the Core Strategy advises that hotels would be allowed in town centres, strategic cultural areas and places with good accessibility to public transport, providing that there is no harm to local character.
119. The London Plan (policy 4.5) aims to provide a net increase of 40,000 hotel bedrooms by 2031 and advises boroughs to focus strategically important new visitor provision within opportunity areas and within the Central Activities Zone (CAZ). The application site is located within the Old Kent Road Opportunity Area; it has a good public transport accessibility level of 4 that will rise to 6b on once the Bakerloo Line Extension is delivered. The location therefore does meet the requirement for high public transport accessibility.
120. Notwithstanding that a hotel on this site may be appropriately located, the requirement for the proposal to not result in an over dominance of visitor accommodation needs to be considered. There are a number of existing hotels including These businesses, identified in NJB’s Corporate Hotel Schedule, include two Eurotravellers (194 Old Kent Road and 18 Amelia Street), Restup London (172 New Kent Road) and Safestay (144

Walworth Road). which are located within proximity to the application site. However it is not considered an over-concentration and would not detract from the vitality of the area or reduce the opportunity for a range of other services to be provided. The hotel would enhance the offer, providing footfall and additional spending power within the town centre.

121. The Central Activities Zone area has seen a strong growth in hotels and, whilst this growth helps meet a demand, it is important that further provision is delivered outside of this area.
122. The GLA's Hotel Demand Study (2006) indicated that approximately 2,500 additional hotel rooms would be needed in the borough over the period 2007 to 2026. Given the number of new hotels built, and those that have consent, it is likely that this target will be reached. A more recent GLA report 'Projections of demand and supply for visitor accommodation in London to 2050' (2017), which provides part of the evidence base to the draft London Plan, sets a higher target of 58,140 net additional rooms across London by 2041. It suggests a target for Southwark of 1,795 net additional rooms in the period 2015 to 2041. It also notes that Southwark currently provides 4% of the total visitor accommodation for London, the 7th highest borough total.
123. The site is considered to be well suited for hotel use given its good accessibility to existing and proposed public transport within a new district town centre and as such it is reasonable to expect to see hotel accommodation provided in this location. The number of hotel developments, both built and in the development pipeline, has increased significantly in the last decade and these are concentrated in the northern part of the borough.
124. Given that within the wider area there is not an over-dominance of hotels in the and taking account of the weight of support London Plan Policy 4.5 (London's visitor infrastructure) gives to hotel use in Opportunity Areas, and the importance of tourism to London's economy, the proposed hotel is considered to be an acceptable land use in principle.

Cinema

125. The scheme includes the provision of 1,141sqm of D2 space as a two-screen cinema that would occupy floorspace at basement level beneath the central square between Blocks 2A and 2B. This would be delivered within phase 2 of the development.
126. Saved Policy 1.11 of the Southwark Plan states that planning permission for new cultural facilities would be granted where they meet the following criteria:
 - a) Where the character of an area within a Strategic Cultural Area is not unacceptably compromised; and
 - b) Outside the Strategic Cultural Area, where the activity does not have a significant detrimental effect on the environment or local amenity, and has good public transport accessibility; and
 - c) All new visitor attractions will be expected to provide and implement a visitor management strategy to mitigate local impact on amenity.
127. The site is considered appropriate and acceptable for a cinema use. The main entrance is located within the public square, with plenty of circulation space to enable

visitors to arrive safely. Further, the draft OKR AAP and NSP allocations support this cultural use, alongside London Plan policies 4.6 and 4.7.

128. The cinema is welcomed and is considered as a positive benefit of the proposals, attracting the existing community as well as the new residents and workers.

Business relocation and retention

129. In respect of the OKR4 allocation, the policy explicitly states that redevelopment of the area overall must replace the existing retail floorspace with active frontages along the Old Kent Road.
130. It would not be possible to re-provide retail floorspace at the scale of the existing offer with associated car parking on this site and meet the wider policy objectives to deliver new homes, jobs and public spaces. However neighbouring sites on OKR4 may be able to increase their retail provision which should enable the policy to be delivered over the entire OKR4 designation.
131. The proposed development would retain a large format retail use in Phase 1, designed to meet the future requirements of other potential operators at the application site, as well as introducing new , smaller commercial premises which could include Argos. The smaller commercial premises would include a range of new retail, service and leisure uses and would activate frontages on Old Kent Road and Humphrey Street and new public square. These premises would be suitable for a range of national, regional and independent operators.
132. The loss of Argos and Sports Direct in Phase 1 from the site would have some impact but there are alternative facilities that can meet the requirements of the residential community. The nearest alternative Argos stores are located on Walworth Road and Peckham, with alternative Sports Direct located on Walworth Road, Peckham, and Canada Water.
133. Delivery of Phase 2 would entail the loss of the DFS and Carpetright stores commencing in the mid 2020s. The nearest alternative DFS store in south London is located in Croydon. An alternative Carpetright store is located at 651 Ruby St towards the southern end of the Old Kent Road. It should be noted that this alternative store is likely to come forward for development in the near future as pre-application discussions have commenced.
134. Overall, the proposed development would significantly increase the level and mix of town centre uses at the application site. It would be a catalyst for the transition of the Old Kent Road from a fragmented, car dominated environment to a more cohesive and traditional 'high street' form which would support the emerging allocation of this area as a district centre.

Job Creation

135. The proposed development would contribute to local employment during both the 'Demolition and Construction' and 'Completed' phases. In the construction phase, it is estimated that there would be 152 full time equivalent positions over a Phase 1 and Phase 2 construction period.

136. It is estimated that the proposed development would generate between 161 FTE positions which is an increase over the existing 54 no of jobs (FTE). The breakdown of the 161 FTE jobs is:
- 118 Retail jobs
 - 39 Hotel jobs
 - 4 Cinema jobs
137. An estimated 317 FTE jobs per year (over four years) will also be created through construction of Phase 1 with an estimated 120 FTE jobs per year (over three years) for Phase 2.
138. There is a net gain of up to 544 jobs which is a significant positive aspect of the scheme.
139. In addition to the increase in the number of jobs proposed, the applicant has also agreed accept an obligation in the S106 to ensure employees in the proposed development, as well as during construction, are paid the London Living Wage.

Provision of housing, including affordable housing

140. The provision of up to 724 new residential units of which 25.25% by habitable rooms are social rented and 10.36% by habitable rooms are Intermediate, would assist in achieving housing targets set out within the draft OKR AAP, draft New Southwark Plan and draft New London Plan. There is a pressing need for housing in the borough. The adopted London Plan (2016) requires the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. Strategic Policy 5 of the Core Strategy requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. This is echoed by emerging policy in the draft new London Plan, NSP and draft OKR AAP. The proposal would make a sizeable contribution to the borough's housing stock and combined with a policy compliant affordable housing offer; this is considered to represent a significant positive aspect of the scheme.

Provision of a new public realm

141. In line with the requirements of the draft OKR AAP, the development would deliver a significant contribution to the new public realm within proposal site OKR4 by creating a meaningful town centre layout and civic offer. The provision of the proposed central square and adjoining areas of landscaped public realm would be a significant improvement over the existing tarmacked site and would be the first enabling step for the future delivery of a comprehensive public realm offer across this new town centre location with later phases on the adjoining Tesco site and the potential future removal of the Humphrey Street gyratory. In order to ensure consistency and safety within the proposed public realm, the landscape proposals for this development need to be carefully coordinated with those of adjoining sites where feasible, and also with the council and Transport for London. A s278 highways agreement would be agreed to enable this.

Image: Landscape plan



Prematurity

142. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance “arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

- (a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
- (b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

143. Refusal of planning permission on grounds of prematurity will seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.”
144. The most up to date development plan pertinent to the Old Kent Road area is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing led growth. The OKR AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the New London Plan aspirations for industrial land and employment are addressed. This scheme is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London plan and the direction of travel of the draft New Southwark Plan and the 2016 and 2017 draft AAPs and the 2018 draft New London Plan. It is not therefore considered too be premature.

Conclusion on land use

145. There are major regeneration benefits of the scheme including the provision of new public realm, the new active frontages along the Old Kent Road and Humphrey Street, residential frontages to Rowcross Street and Rolls Road, a 195 bed hotel, a cinema returning to Old Kent Road, job creation, the provision of good quality, flexible retail space, dedicated large format retail space, a sizeable contribution to the borough’s housing stock and a policy compliant level of affordable housing. For these reasons, officers consider that the principle of the proposed development in land use terms should be supported. In relation to town centre uses, it is considered that whilst the proposed development would introduce main town centre uses outside a currently designated town centre, the proposals would comply with the tests set out in the NPPF and emerging policy and that this would not be to the detriment of other designated centres.

Environmental impact assessment

146. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The proposed development falls within Schedule 2, Category 10(b) ‘Urban Development Project’ of the EIA Regulations and constitutes EIA development having regard to its potential for likely significant environmental effects.
147. Prior to the submission of the planning application, the applicant requested ‘Scoping Opinions’ under Regulation 13 of the EIA Regulations to ascertain what information the Local Planning Authority considered an Environmental Statement (ES) should include (ref: 18/AP/1913).
148. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has first taken the ‘environmental information’ into consideration. The ‘environmental information’ means the ES, including any further information, any

representations made by consultation bodies, and any other person, about the environmental effects of the development.

149. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. It details the results of the EIA and provides a detailed verification of the potential beneficial and adverse environmental impacts in relation to the proposed development, including the following areas of impact::

- Heritage, Townscape & Visual Impact Assessment;
- Daylight, Sunlight and Overshadowing;
- Transport;
- Microclimate-Air Quality;
- Microclimate - Wind;
- Ground Conditions, Hydrogeology, and Contamination;
- Flood Risk & Water Resources;
- Noise & Vibration;
- Socio-Economic Effects;
- Archaeology; and
- Climate Effects.Socio-economics
- Archaeology
- Air quality
- Noise and vibration
- Wind microclimate
- Daylight, sunlight and overshadowing
- Cumulative effects
- Townscape, Heritage and Visual

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

Alternatives

151. The EIA Regulations require an ES to include an outline of the main alternatives considered by the Applicant, indicating the main reasons for the choice made, taking into account the environmental effects. The applicant has considered the following alternatives:

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

152. The “do nothing” alternative would mean the site left in its current underutilised condition resulting in no delivery of housing or employment opportunities, no improvement in local connectivity or permeability, no improvement in public realm or open space and no improvement in biodiversity and sustainability.

153. Alternative sites were not considered as the applicant is the owner of the site and sites owned by third parties were not given consideration. Further, the site is specifically allocated in the draft OKR AAP as a proposal site for redevelopment which would contribute to meeting the boroughs housing needs and employment contribution.
154. In terms of alternative designs and design evolution, various layout arrangements for the tall buildings were explored. Their relationship with each other was looked at as well as the developing massing of proposals for Tesco. The façade and materiality options were considered during the design evolution process. Overall, it is considered that the alternatives have been appropriately explored.

Cumulative impact assessment

155. The submitted ES includes an assessment of the proposal as well as relevant “committed schemes” as well as the development envisaged by the draft OKR AAP. The applicant has used a virtual model (to assist with matters such as views, daylight, sunlight and overshadowing) and a physical model (to analyse the effects of wind microclimate) for the site allocations in the AAP to ensure that due regard is had to land adjoining the application site and within the wider locality.
156. The applicant has also worked collaboratively with adjoining land owners to ensure the development of separate sites within the emerging OKR4 allocation are cohesive. It has ensured that public areas, access and land uses are aligned to maximise permeability and the quality of the future environment.
157. The cumulative impact of assessing the impact of the proposal, together with committed schemes and the draft OKR AAP masterplan can be found in relevant sections of the report.

Conclusions of the Environmental Statement

158. The ES notes the significant beneficial impacts of which include the provision of 724 new dwellings in Southwark and the provision of up to 544 jobs. The conclusions of other matters of the ES, such as daylight, sunlight, wind and townscape impacts are discussed later in the report, in the relevant sections.

Affordable housing

159. The proposed development would provide 35.52% affordable housing with an overall tenure split 25.18% social rented and 10.34% intermediate housing. In total, 148 new social rented homes and 71 shared ownership intermediate homes would be provided.
160. The Southwark Plan saved policy 4.4 requires at least 35% of all new housing as affordable housing. Of that 35%, there is a requirement for 50% social housing and 50% intermediate housing in the Old Kent Road Action Area. The adopted London Plan 2017 sets a strategic requirement of 60% social housing and 40% intermediate housing. The emerging New Southwark Plan sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% intermediate housing to be provided. As such, the proposed development is in accordance with the emerging New Southwark Plan.
161. The requirement for social housing set out in the New Southwark Plan is higher than

the London Plan and the saved Southwark Plan policy given the acute need for social housing in Southwark. Approximately 57% of the borough's total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute affordable housing need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions. Overcrowding is strongly related to poor physical and mental health and can strain family relationships. Children in overcrowded homes often achieve poorly at school and suffer disturbed sleep. Social rented housing is vital to social regeneration as it allows residents who cannot afford suitable market housing to remain close to their families, friends and employment. For this reason emerging Policy P1 of the New Southwark Plan requires a minimum 25% of homes to be provided as social rented housing which the proposed development complies with.

162. In total, 2110 habitable rooms would be provided in the development. The development would provide a total of affordable habitable rooms which would equate to an overall provision of 35.52%. The level of provision would achieve the minimum target of 35% and is therefore fully policy compliant and a positive aspect of the scheme.
163. With regard to tenure split, out of the 752 affordable habitable rooms, 533 would be social rented (25.18%) and 219 would be intermediate shared ownership (10.34%).

Table Affordable housing

Tenure	Units		Hab rooms	
	No.	%	No.	%
Total	724		2117	
Private	505	69.75%	1365	64.48%
Social rent	148	20.44%	533	25.18%
Intermediate	71	9.80%	219	10.34%

164. The affordable housing proposed would be provided in the following phases and blocks:

Phase	Block	Social	Intermediate
Phase 1	Block 1A	0	0
Phase 1	Block 1B	0	0
Phase 1	Block 1C:	52	0
Phase 1	Block 1D:	52	0
Phase 2	Block 2A	0	16
Phase 2	Block 2B	55	44
	Total	148	71

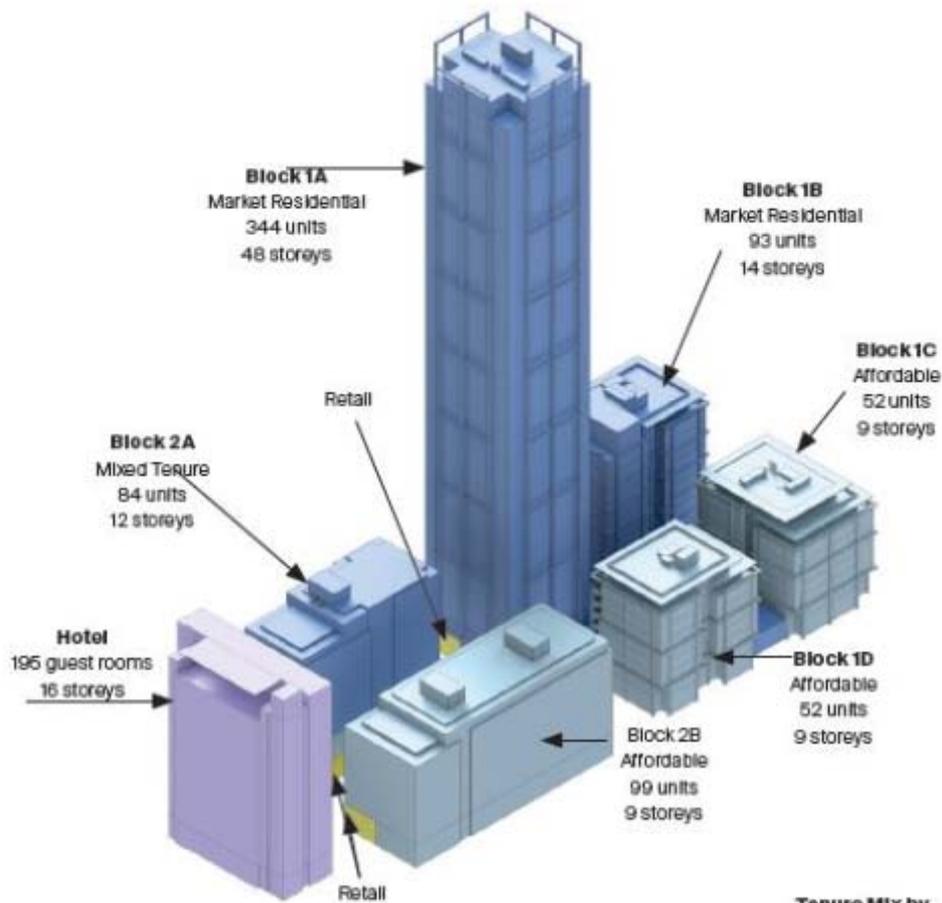
Phase 1 would deliver 70% of the social rent component of the affordable housing.

The affordable housing units mix is:

Tenure	Unit mix	Unit numbers
Social rent	Studio	0
Social rent	1 bed	116

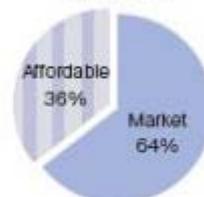
Social rent	2 bed	44
Social rent	3 bed	46
Intermediate	Studio	0
Intermediate	1 bed	36
Intermediate	2 bed	28
Intermediate	3 bed	7

Image: Tenure locations with the scheme



	Market	Affordable Intermediate	Affordable Social Rent	Total
Studio	25	0	0	25
1-Bed	184	36	58	278
2-Bed	250	28	44	322
3-Bed	46	7	46	99
Total	505	71	148	724

Tenure Mix by Hab rooms



Affordable Mix by Hab rooms



165. A section 106 agreement is recommended to secure the delivery of these units, including a clause preventing more than 50% of the private units from being occupied until the affordable units have been completed. In line with the Mayor's Affordable Housing and Viability SPG, an early review mechanism would be secured by the Section 106 agreement, which would come into effect if the development does not substantially commence within 24 months. The review would determine whether the viability of the development has improved during that time, and accordingly whether it could deliver any more affordable housing. The review would be an upwards only review with the 36% guaranteed.
166. A contribution of £9,529.20 (a charge of £132.35 per unit) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the legal agreement.
167. In conclusion, the level of affordable housing is considered fully policy compliant and is a positive aspect of the proposals.

Development Viability

168. Southwark's Development Viability SPD requires a financial viability appraisal to be submitted for all planning applications which trigger a requirement to provide affordable housing. The financial viability appraisal should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements.
169. This application is therefore accompanied by viability report, which was reviewed by independent consultants on behalf of the council.
170. The applicant's appraisal generates a profit on GDV of 2.24% against a blended target margin of 18.84% (reflecting 20% on the private housing, 6% on the affordable housing, 15% on the hotel and cinema, and 17.5% on the retail floorspace). On the basis of this outcome, the applicant concludes that the 35% affordable housing (70% social rent and 30% intermediate, the latter being in provided in line with the Council's affordability criteria) offered by the Applicant is the maximum viable provision.
171. Our consultant has the submitted appraisal and the supporting material and identify inputs where amendments are necessary so that they are consistent with the evidence available. As a result of these changes, the viability of the scheme has improved to generate a blended profit margin of 16.37%. This remains marginally lower than the target margin of 18.84% and on the basis of this result, it is considered that the Applicant's offer of 35% affordable housing is the maximum reasonable.

Grant funding

172. The applicant has undertaken some analysis to consider whether it would be viable to increase the quantum of affordable housing to 40%, from 35.52%, if grant funding were to be available. In order to fully explore the option, Gerald Eve, discussed the scheme with three Registered Providers from Southwark's preferred partner list. All three Providers confirmed that the £28,000 per unit grant from the GLA is generally not

sufficient to plug the tenure value gap in higher value areas.

173. Therefore assuming that the grant was applied to all units, there would a significant negative impact on the viability of the scheme as the profit level would fall by £4.45m to produces a 1.07% profit on cost. This is set against a backdrop of already low profitability levels.
174. Concern has also been raised that the Mayors funding programme ends in March 2021. In order to qualify for grant the developer or RP must have made a Start on Site. Under the Mayors definition of Start on Site- a main building contract must be in place, a main contractor in possession of the site and foundation/ piling must have commenced. Basement excavation alone is not enough to trigger Start on Site.
175. Given the applicants need not only to secure Vacant Possession; but also undertake further detailed technical design that would include foundation and basement design that will need the agreement of TfL,, contractor procurement, and basement excavation the timescales are unlikely to fall within the criteria for this funding round. As yet any funding beyond 2021 has not been made public.
176. Officers accept that it is not currently financially viable to move to 40% affordable housing with grant funding on the Southernwood Site. However, as at the Cantium Retail Park, Officers propose to include a clause in the the s106 requiring the developer to review this position prior to the implementation of the scheme.

Design, layout and impact on townscape views and heritage assets

Design issues

177. Strategic Policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to “achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.” Saved Policy 3.12 ‘Quality in design’ of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. Saved Policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, character and townscape, local and strategic views and resultant streetscape. Policy 7.7 of the London Plan (2016), ‘Location and Design of Tall and Large Buildings’ and Saved Policy 3.20 of the Southwark Plan set out design requirements for tall buildings, all of which are discussed in further detail in the following paragraphs.
178. The emerging design policy in the New Southwark Plan includes P12, Design Quality and P14 Tall Buildings. P12 sates that development must provide, amongst other things, high standards of design with appropriate fabric, function and composition. P 14 sets out a series of tests for tall buildings (defined as significantly taller than surrounding buildings or their context). It also states that the highest tall buildings will be located in areas where there is the greatest opportunity for regeneration, including opportunity Areas, such as the Old Kent Road.
179. Given the different length of leases on the existing retail units and the interface with

the future Bakerloo Line station the proposed development would be phased. It is proposed that Phase 1 would deliver a hotel on Old Kent Road, and the tower and 3 pavilion blocks over the podium at the north of the site. The middle area of the site would be delivered under Phase 2 as the central retail square anticipates the changing context of the draft Old Kent Road masterplan and new Bakerloo Line station. As a result, Phase 1 designs are submitted and discussed here in detail, whereas Phase 2 is in outline only. The only matters reserved however, are internal layout and external appearance. The position of the buildings and their height, scale and massing are fixed and can therefore be addressed in this report with certainty. There is however a design code to offer comfort that the quality of design will be appropriately high.

Image: Site Layout – Phase 1 and 2



180. The proposed site layout divides the site into three urban blocks by introducing two new east-west pedestrian links running parallel with the Old Kent Road. Between the two pedestrian links, a 'central court' is proposed, intended as a green, active heart to

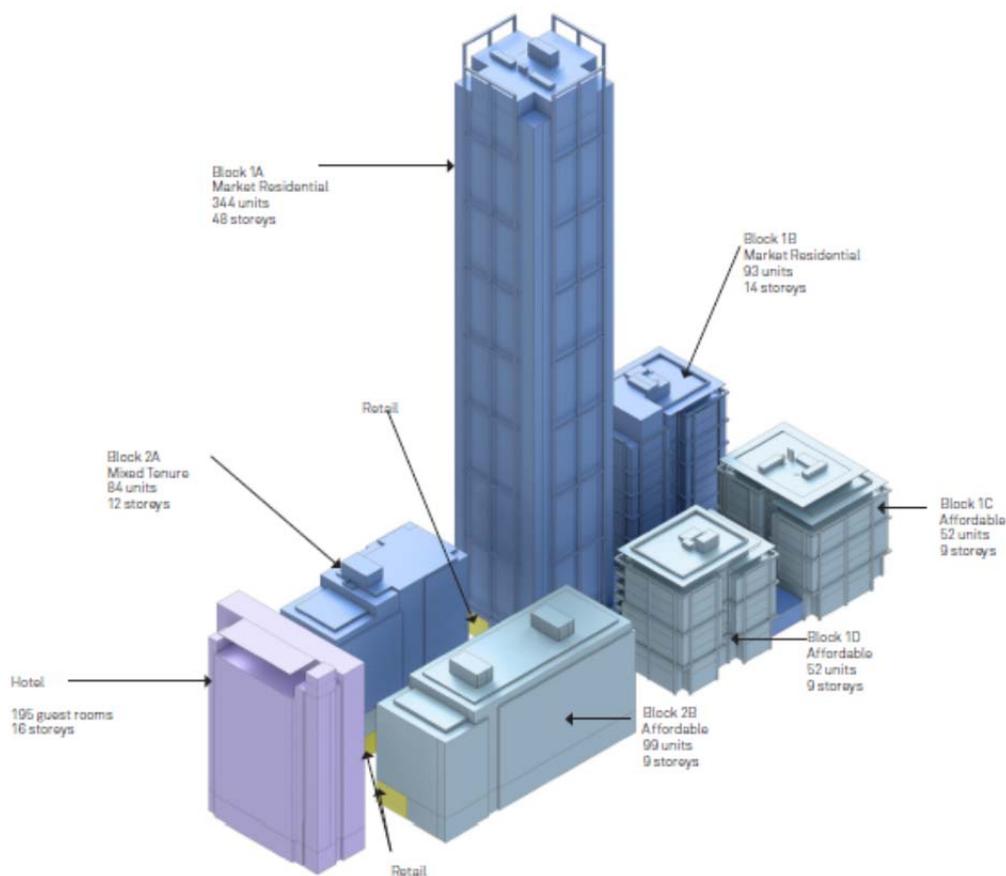
the site away from the heavily trafficked street frontages. The block fronting onto the Old Kent Road itself would form a new hotel of 16 storeys in height (including double height ground floor lobby). Behind this, facing onto Humphrey Street and Rowcross Street would be two linear buildings, framing the central court between them. Behind that, enclosed by Rolls Road, would be a podium block with a residential garden on top of the podium and larger retail units within it. On top of the podium, would be four individually defined pavilion blocks. This arrangement would allow more light into the central court and garden spaces on top of the podium. It would also improve daylight levels to neighbours, create a larger number of dual aspect units and allow the omission of north facing units. The tallest tower would rise up from the podium to a maximum height of 48 storeys.

181. The perimeter form of the proposed development would create a new public space at the centre of the site, away from the heavily trafficked street frontages. This new space connects the two east – west routes to further enhance permeability and ground floor activation. The proposals would deliver 4150m² of new accessible public spaces and routes. The new pedestrian routes running from Rowcross Street to Humphrey Street will serve a large number of commuters from the residential neighbourhoods to the future Bakerloo Line Station as a more pedestrian friendly environment away from Old Kent Road itself and the civic square proposed by the draft Old Kent Road AAP on the Tesco Site. It would also result in enhanced and attractive environments to encourage walking and cycling.
182. The existing frontages facing onto every street surrounding this site are currently very inactive, dominated by surface level car parking for the large retail sheds on the site. This is because the existing site creates a gap in the street frontage of Old Kent Road, which was historically lined with terraced buildings and shops. This unwelcoming and hostile condition would be vastly improved with the introduction of leisure, retail and restaurant uses fronting onto Humphrey Street and Old Kent Road, and new residential dwellings fronting onto Rowcross Street and Rolls Road. The new buildings would also be set back from the existing boundary to allow more generous pavements.
183. The ground floor layout would be outward-looking, with active frontages along the existing streets and the new open spaces proposed within the development. The open, double height hotel lobby would provide visual and physical connection between Burgess Park, Old Kent Road and the new central court at the heart of the Southernwood site. The hotel lobby would provide active ancillary uses and thus form part of a mix of leisure, restaurant and retail space animating Old Kent Road. It would also provide direct public access to the proposed rooftop bar/ restaurant.



184. Locating the hotel on the Old Kent Road frontage would create a buffer for the residential uses from the noise and pollution created by the busy road. It would also offer the hotel good visibility and open views to Burgess Park.
185. A range of retail units would activate the Humphrey Street frontage and the central court. A larger retail unit would occupy the northern podium. The variety of different sized retail units proposed would allow for a range of facilities catering for the needs of the local community and therefore ensuring vibrancy and animation. There would be a glazed pavilion within the central court that would provide access to a cinema at lower ground floor level. This 'anchor' use would attract footfall to the site and contribute to evening activity, as well as a vibrant daytime atmosphere.
186. The quieter, residential character of Rolls Road and Rowcross Street to the north and the east of the site would be respected, whilst still providing active frontages in these locations. This would be achieved by having the proposed residential uses come down to ground floor level. This would include residential maisonettes at the lower levels on Rowcross Street and Rolls Road, set behind a shallow defensible space and raised above pavement level to ensure good levels of privacy. A green edge to the defensible space would soften the street scene.
187. Ground floor servicing and ramped access to the basement parking would be discreetly detailed with access from Rolls Road and egress to Rowcross Street.
188. In addition to the new open spaces, enhanced public realm and active frontages, the proposed site layout would also represent substantially increased connectivity and permeability for the area, particularly through the introduction of the two new east-west link across the site. The delivery of at least one east- west link was a key requirement of the draft Old Kent Road AAP in relation to this site. The positions of the proposed links respond well to the proposed location of the new Bakerloo Line station and the potential new civic square that the draft Old Kent Road AAP requires in the neighbouring site. The site layout has been developed with full and careful consideration of other emerging development proposals on neighbouring sites

Height, Scale and Massing



189. The proposed massing strategy includes one very tall building of 48 storeys in height, and a number of other buildings that would be defined as tall under Southwark Planning Policy. The latter includes a 16 storey hotel building (with double height ground floor) fronting onto the Old Kent Road, a twelve storey linear block fronting onto Humphrey Street (Phase 2 development) and a 14 storey pavilion building at the corner of Humphrey Street and Rolls Road. The rest of the site would consist of buildings of around ground plus eight storeys, arranged in a perimeter layout, intended to create well-balanced residential streets. Following negotiations with Officers, the blocks along the eastern edge of the site were reduced in height to preserve neighbouring amenity. In this location, the building heights would step down to seven storeys, roughly the same height as the existing Astley House on the other side of Rowcross Street. Together with Astley House, these new buildings would define a regular perimeter to the existing green space on Rowcross Street, strengthening its identity as an urban garden square with great potential. The result is a balanced approach to height, scale and massing with the taller buildings confined to the less sensitive western edge of the site.
190. The heights of the two tallest buildings in particular would mark a step change in the scale of the area, particularly the 48 storey tower. The massing strategy is however, broadly in line with the emerging policy set out in the draft Old Kent Road AAP (acknowledging its very limited weight), and accords with The London Plan (2016) and the Southwark Core Strategy and Local Plan. The tall buildings have been arranged to

allow for as much space between them as possible, ensuring that they would not appear to coalesce when viewed from a distance. This also ensures that good levels of sunlight and daylight would reach the public realm and communal amenity spaces. The relative heights and the way in which they would be distributed across the site would result in a well articulated composition defining the new public realm and serving an important landmark role identifying the proposed Bakerloo Line Station.

191. The 48 storey tower would have a landmark presence. Its slender form would be visible from all points of the compass, and it would act as a marker for the new public space within the site, the new Bakerloo Line Station in the neighbouring site and the new town centre. It would however, also be drawn away from the site's residential neighbours across Rolls Road and Rowcross Street, thereby preserving their amenity and outlook.
192. The scale of the hotel building would provide an appropriate response to long views from Burgess Park and a well articulated marker in long views along the Old Kent Road itself. The depth of the hotel building has been kept very narrow in order to appear slender in views along Old Kent Road. The building line has also been set back from the edge of the existing pavement to provide a wider footway on this heavily trafficked route.



View from Old Kent Road looking east - the revised proposals in the context of the draft APP

193. The massing strategy is largely in line with the Building Height Strategy ('Stations and Crossings') proposed in the draft Old Kent Road AAP. The draft AAP identifies the potential for tall buildings at the new Bakerloo Line station sites, to "mark their city wide significance and optimise the use of land in the most accessible locations". The Stations and Crossings Strategy within the draft AAP is also informed by London View Management Framework (LVMF) and local protected views. The northern part of the application site is outside both sets of protected viewing corridors. The southern part of

the site however, is visible in the foreground of the Southwark view from Nunhead Cemetery to St Paul's Cathedral. This has therefore informed a guideline height limit of 16 storeys ('Tier 3') in this location. The proposed hotel building would be 16 storeys in height (including a double height ground floor lobby), and therefore broadly in compliance with this guidance. As discussed in more detail below, the impact of the hotel on the protected view has been assessed and is not considered harmful by Officers.

194. The northern part of the Southernwood site, where the 48 storey tower under consideration here is proposed, is the only allocated site in the northern section of the Old Kent Road that sits outside defined viewing corridors from the LVMF and locally protected views. As identified in the draft Old Kent Road AAP, it is therefore the only opportunity to provide a landmark tower to mark the presence of the new Bakerloo Line Station and maximise the development potential presented by the future public transport connectivity.
195. The design of the tall buildings would be exemplary, with careful consideration of their impact on the skyline. They would all have clear vertical emphasis; well defined bases, middles and tops; and well considered fenestration and detailing. The two tallest buildings, the tower and the hotel, would also have unique and well articulated tops that would create a distinctive silhouette on the skyline.
196. As the proposed buildings, particularly the hotel and the tower, would be substantially taller than those in their existing surroundings, they would be defined as tall buildings in the adopted London Plan (2016). Policy 7.7 of the 2016 London Plan, 'Location and Design of Tall and Large Buildings', states that tall buildings should be limited to sites in the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport.' Furthermore, London Plan Policy 2.13 requires development in Opportunity Areas to optimise residential and non residential output densities, meet or exceed minimum housing and employment guidelines and support wider regeneration objectives. Annex 1 of the 2016 London Plan sets out the specific requirements for the Old Kent Road Opportunity Area, identifying it as having significant potential for residential- led redevelopment. As such, it is considered that the Old Kent Road Opportunity Area is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. The proposed development is considered to achieve both, whilst also meeting the other requirements of London Plan Policy 7.7, which are as follows:
 - Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;
 - Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
 - Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
 - Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;
 - Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;
 - Have ground floor activities that provide a positive relationship to the

surrounding streets;

- Contribute to improving the permeability of the site and wider area, where possible;
- Incorporate publicly accessible areas on the upper floors, where appropriate;
- Make a significant contribution to local regeneration;
- Not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference; and
- Not impact on local or strategic views adversely.

197. This policy also states that the impact of tall buildings proposed in sensitive locations, including the settings of conservation areas and listed buildings should be given particular consideration. The nearest Conservation Area to the Southernwood site is the Cobourg Road Conservation Area, just on the other side of Old Kent Road. The proposed development can therefore be reasonably considered to be within the setting of this heritage asset. Given the heights of the buildings proposed, they would also be visible from a number of other, more distant sensitive locations. This is discussed in more detail below, where the submitted Townscape, Visual and Heritage Impact Assessment (TVHIA) is considered in detail. The following paragraphs take each of the other requirements of London Plan Policy 7.7 in turn

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

199. The proposed tall buildings would relate well to their surroundings, particularly at street level, with active frontages, increased connectivity and permeability and a new public open space. The ground floor of the hotel would contribute well to the reintroduction of a high street character along the Old Kent Road. The urban grain of the area would be enhanced. The sensitively detailed architectural design of the tower, which is discussed in further detail below, would respond to the existing local townscape, whilst introducing a new high quality aesthetic.

200. The proposed tower in particular, would improve the legibility of the area by signifying the location of the new Bakerloo Line station and the heart of the proposed town centre. Furthermore, as a result of the new public realm, hotel, retail and sunken cinema proposed on the site, it is likely that this area would become a focus for leisure activity. As such, it would become a point of civic significance, as well as an important location geographically in the structure of the city. The design proposed would enhance the skyline and image of London with the tallest building forming a focal point with a strong vertical articulation, a well articulated top and well defined rhythm and order.

201. The proposals demonstrate the highest standards of architectural design and incorporate the highest quality materials. The elevational strategy and material palettes are discussed in more detail below. In order to secure this design quality, planning conditions requiring detailed drawings, material samples and full scale mock ups are recommended. It is also recommended that a clause be included in the

Section 106 to secure the architecture firm who designed the scheme to date to deliver the detailed design of the scheme (unless otherwise agreed in writing). It is also clear from the submitted energy and sustainability strategies that the proposals would incorporate high quality sustainable design and the draft CEMP demonstrates commitment to excellent construction practices.

202. The positive nature of the ground floor activities, their relationship to the surrounding streets and the vastly increased permeability proposed has already been discussed above. These aspects of the proposals represent significant public benefits. The proposed development would incorporate a publicly accessible restaurant at the top of the hotel building. Although this is not the tallest building proposed, it would offer some of the best views across Burgess Park. It should be noted that the London Plan (2016) only requires publicly accessible areas on the upper floors “where appropriate”, so this is considered to be in compliance. A number of roof top gardens for residents of the scheme, including the communal garden on top of the large podium, would also be incorporated, giving a soft, green layer of articulation to the appearance of the buildings.
203. The contribution that the scheme would make to local regeneration would be very significant. As has already been identified throughout this report, this would include the provision of significant contribution to the borough’s housing stock, including affordable housing; a significant increase in jobs and new employment spaces; the delivery of a new cinema and the creation of a new piece of public realm.
204. The impact of the proposed development on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference is all assessed in the submitted ES and presented elsewhere in this report. In each case it is concluded that there would be no significant adverse impacts.
205. Finally, there would be no unjustifiably harmful impact on local or strategic views, as discussed in more detail below. It should be noted however, that there would be a small number of sensitive locations from which this needs a carefully balanced decision.
206. As the most recently adopted Development Plan, and the only document adopted after the Old Kent Road was designated as an Opportunity Area with significant potential for residential-led redevelopment, it is considered that these London Plan (2016) policies in relation to tall buildings are more relevant than those in Southwark Plan Saved Policy 3.20 dating from 2007. Nevertheless, the proposed development has also been assessed against the requirements of this saved policy. Saved Policy 3.20 requires any building over 30 metres tall to ensure that it:
 - Makes a positive contribution to the landscape; and
 - Is located at a point of landmark significance; and
 - Is of the highest architectural standard; and
 - Relates well to its surroundings, particularly at street level; and
 - Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
207. The proposed development would make a very positive contribution to the landscape through the creation of a new piece of public realm and enhancements to the Old Kent Road itself. The other surrounding streets would also be widened and enhanced as a

result of these proposals.

208. The proposed tall buildings are at a point of landmark significance as identified in the draft Old Kent Road AAP. As identified above, this significance is generated by the confluence of the new high street, the proposed Bakerloo Line station and Burgess Park. The new central court, hotel and cinema use would also make a contribution to the landmark significance of the proposed development. The scale of the tall buildings would relate well to their settings, particularly the open space of Burgess Park.
209. In conclusion on height, scale and massing, the proposed buildings would be broadly consistent with the draft Old Kent Road AAP. The architecture would be of a high quality. The buildings would have a clear sense of order, with well articulated forms and elevations of a regular and ordered quality. The use of projecting frames and inset balconies would provide depth and articulation to the facades. They would also contribute positively to the London skyline, with distinctive and well resolved tops to the tower and hotel buildings.

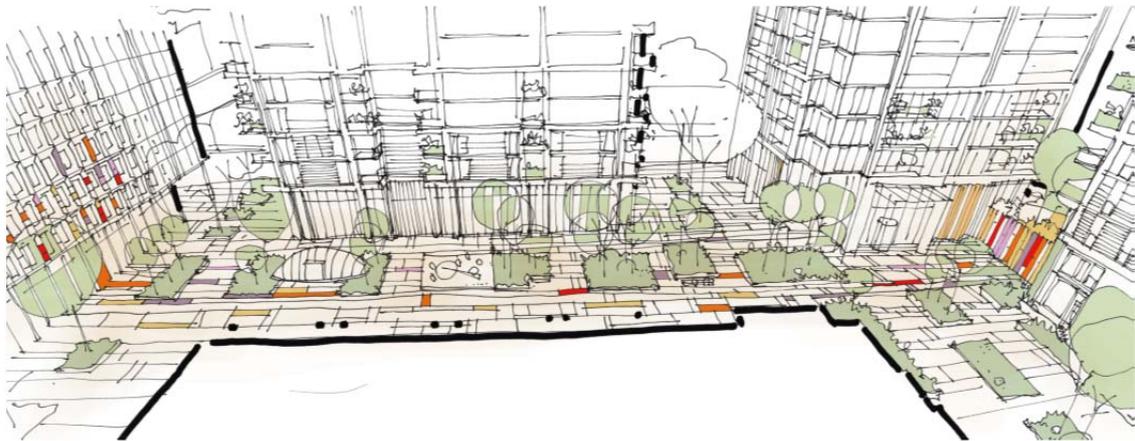
Architectural Design and Materiality

210. Across the scheme, a hierarchy of materials is proposed with heavier, more robust materials in the bases of the buildings and lighter and finer materials on the upper levels. The bases of the buildings would integrate pre-cast Glass Reinforced Concrete (GRC) and masonry elements, including brick. The main facades of the mid-rise buildings would set masonry infill panels within a GRC frame and the tower would be detailed in white and gun metal enamelled metal. The hotel would be expressed through a deliberately different architectural language. The hotel would adopt a different approach again, in order to distinguish it as a new destination on the Old Kent Road. It would use glazed bricks to deliver vibrant colours and have a more playful and unique architecture, inspired by the flamboyance of local pubs such as the Thomas a'Becket and the now lost World Turned Upside Down. It would however retain enough similarity with the other buildings proposed to ensure the creation of a strong sense of place and identity. The proposed detailed design and use of materiality would introduce variety within the overall order of the buildings, which would otherwise be relatively simple in their order and form. The detailed design would also introduce depth and layering, and ensure that balconies are incorporated into the overall composition, rather than feeling like 'add-ons'.
211. The tower would be square in plan, articulated by projecting bays on each facade that would accentuate its slenderness. The bays would be delineated by an expressed white super-frame, which would also define the balconies and extend beyond the top of the building to create a well defined silhouette at the apex. The language of white framing and detailing is a characteristic of many buildings along the Old Kent Road like the Thomas a'Becket and Dun Cow pubs, Wells Furniture Store and the Old Fire Station. Through negotiation with Officers, the architects have explored further contrasts between the white super-frame and the darker material palette for the main body of the building. The revised proposals would also introduce a red rust colour to the soffit of the balconies to complement the white frame and darker grey metals, and further reference the tonal varieties already found in the area. The balconies in the mid rise buildings would also share this red rust colour soffit detail. The facade of the tower would have a higher ratio of glass than the heavier, masonry mid rise blocks to take best advantage of the open aspects and expansive views. The solid-to-void ratio would also balance thermal performance with daylight and outlook and give the structure an architectural lightness.

212. Following negotiation with Officers, the design of the tower was revised to simplify its articulation and enrich its detail. For example, an inset penthouse floor previously-proposed about two thirds of the way up the tower has been taken out, as it was considered to compromise the elegance of the tower by breaking its verticality. The penthouse units were relocated to the top of the tower, resulting in a more generously proportioned apex. The proportions of the expressed super-frame were also enlarged to further emphasise the tower's verticality, stretching from a three storey module to a 6 storey module.
213. The verticality and transparency of the tower would contrast with the more horizontally proportioned mid rise pavilion blocks. The material palette of the mid rise buildings would be weightier, more robust and warmer in tone than the lightweight metal cladding proposed for the tower. It would be based on traditional materials that are characteristic of the area - masonry, metalwork and glass. Following negotiation with Officers, brick is now proposed as one of the main building materials for the infill at ground and first floor. However, these traditional materials would be used in a contemporary manner that would reflect the building's modern construction, rather than seeking to emulate historic solid masonry construction. This approach is consistent with the guidance in the draft Old Kent Road AAP, which suggests "using brick or stone as the main building materials, with details highlighted in metal".
214. The elevations of the mid rise blocks would be of a uniformly high quality and would be tenure blind. They would create a legible and robust edge to the streets and spaces which surround them and their external appearance would reflect their internal organisation. They would have a lower proportion of glazing when compared with the tower or hotel, which would convey a sense of weight and solidity. The mid rise buildings would however share a common language with the tower, through the white frames proposed around the bays of the facades, which would also add layering and shadow to the elevations. The frames would also integrate the metal balconies into the overall composition of the façades. Further commonality with the tower would also be achieved through the consistent use of an underlying 1.1m facade module.
215. The mid rise buildings would have a clear tripartite order to their facades, but there would also be an underlying vertical rhythm established by the scale of the maisonettes and use of framing elements. The two-storey brick base would establish a robust plinth that would define the extent of the ground floor maisonettes. The main bodies of the buildings would introduce greater depth and layering to the facade. The buildings' corners would open up to provide generous balconies. The top floors would be set back to preserve neighbouring amenity and maximise daylight to neighbours and to the public realm and garden spaces. The set-back floors would be expressed as roofs through the use of lighter metallic materials. The elevations to the courtyard gardens would be finished in a paler palette to maximise reflected daylight within these spaces.
216. The design of the hotel is intended to celebrate the building's function and openness, in much the same way as the historic pubs of the Old Kent Road did, designed to stand out amongst the generally consistent Victorian and Georgian streetscapes. Hotel buildings tend to have repetitive regular facades as a result of their use. The design of the hotel proposed here is intended to respond to this and embrace the opportunities it presents. On the Old Kent Road frontage, the hotel modules would be expressed through glazed bays with integral window seats to create depth and articulation to the façade. The central portion of the facade would be the most solid element of the

composition, providing privacy to the hotel rooms. The cores would be more openly expressed, to articulate the corners of the building and emphasise the public connection between the ground floor retail and the publicly accessible roof space restaurant. Following discussions with Officers, and in order to address some of the concerns raised by the Southwark Design Review Panel, a unique colour scheme has been incorporated into the design of the hotel using glazed brick. The intention is that this will respond to the vibrant colours that can be found already in the local area and act as an aid to navigation when approaching the building along the Old Kent Road. From the west, a blue/green palette would be visible in response to the building's relationship with Burgess Park, but when approaching from the east a warm palette of red tones is proposed to signify arrival in a new town centre. Warm red tones are also characteristic of the historic public buildings on the Old Kent Road. The circulation areas and public spaces within the hotel would be open and glazed, expressing their more public function and providing views through the building.

217. Following the introduction of colour into the hotel design, the architects now also proposed to introduce an element of colour through the public realm. A coloured feature wall would also form a backdrop to the views from the north-south link when approaching from Old Kent Road.



218. The hotel building would provide a strong built edge to Old Kent Road, continuing the active street frontage and providing visual connectivity to the new proposed public space at the heart of the development. Following negotiation, the base of the hotel has been substantially enhanced by the removal of previously proposed cross braced elements and the simplification of the elevational detail. The focus is now on permeability through the lobby to the central court, and the architecture no longer presents a visual barrier to this.
219. The top of the hotel would be defined by a bold over sailing brise soleil structure, which would draw the eye up the building and bring attention to the publicly accessible restaurant proposed at this level. It would also create a distinctive rooftop silhouette on the Old Kent Road, contributing positively to the skyline, especially when viewed from Burgess Park.
220. As set out above, the middle two buildings proposed on the site - the linear blocks that would sit behind the hotel, fronting onto Rowcross Street and Humphrey Street and defining the Central Court are submitted only in outline, with their internal layout and external appearance reserved for future determination. The submission is however supported by a Design Code that establishes clear parameters for their design and

ensures that they will be designed in a manner that complements the buildings applied for in detail, and matches them in architectural quality. This includes restrictions relating to:

- Footprint and top of building;
- General appearance;
- Openings and balconies;
- Base of Building; and
- Material Palette

221. Overall, the quality of design is considered to be exceptional and appropriate for the Old Kent Road Opportunity Area. The quality of materials and architectural detailing would be assured by planning conditions requiring detailed drawings, samples of all facing materials and 1:1 scale mock ups of agreed parts of the facades. The Section 106 Agreement would also include a clause requiring the current architects (Fred Pilbrow and Partners) to be retained to complete the detailed design and construction phases of the project unless otherwise agreed in writing.

Landscaping

222. In line with the requirements of the draft Old Kent Road AAP, the development would deliver a high quality landscape setting that would accommodate significant increases in footfall following the opening of the new Bakerloo Line Station.

223. The proposed landscape would consist of two distinctive, but clearly related concepts: A new urban grain, expanding into the site from Old Kent Road and the future underground station to the west. This would consist of two new east-west links, joined together by a publicly accessible Central Square. They would be publicly accessible at all times, as secured through the Section 106 Agreement. The character of these spaces would be based on a strong orthogonal geometry and colour, relating well to the proposed architecture and knitting the site into its wider context; and A communal residential garden, reflecting the quieter, residential context to the north and east of the site. The garden character would largely be defined by the communal amenity space on top of the podium, but would also permeate through the site providing a green setting to the buildings and an echo of Burgess Park to the south. The communal garden on top of the podium would be accessible to all residents of the new development, regardless of tenure. This too would be secured through the Section 106 Agreement.

224. The design has also sought to increase biodiversity and would incorporate a range of tree species and sizes and create new habitats. The proposed planting would incorporate native and wildlife friendly species. The planting palette would be diverse and species would be selected that are best suited to the conditions of this environment. To complement the vegetation, habitat for invertebrates, birds and bats would be incorporated into the landscape and structures throughout the scheme. It is recommended that this should be controlled by condition.

225. A new Central Court is proposed at the heart of the development. It has been designed with a focus on leisure and relaxation. It would essentially be a linear space, and would be animated with a series of large planted islands, seating platforms, retail spill-out spaces and local play areas. The glazed cinema entrance pavilion would sit at the southern end of the space and would be framed by raised planters. This would

draw activity into the new public realm. A small open plaza at the base of the tower would book-end the Central Court and draw the eye up to the podium garden. The spaces and routes to the east of the site, connecting into Rowcross Street would be softer, with larger areas of planting, more integrated seating and a play area for residents.

226. The entrance plaza at the base of the hotel would offer outdoor seating and retail spill-out opportunities. It would also provide a transition between the active Humphrey Street and the smaller scale residential gardens to the east.
227. The communal garden on top of the podium would provide a significant green space for future residents of the development to use. The gardens would be organised as a series of outdoor 'rooms' which would accommodate a diverse range of spaces and functions. The podium garden would include planting; a mounded central lawn; equipped play and informal play (suitable for 0-11year olds); informal seating and gathering areas; and direct access to core and internal communal amenity space. The podium edges would be defined by hedge planting to mitigate wind effects and to improve comfort. An informal outdoor gathering space is also proposed to overlook the Central Court.
228. Following negotiation with Officers, the size of the podium garden was increased in order to maximise the area available to all residents and ensure podium level apartments would have sufficient defensible space. All residential units have a defensible space between their building line and the garden, designed into the landscape provision.
229. It is proposed that other available roof space would be used for biosolar roofs (biodiverse green roofs with integrated solar photovoltaic panels) and intensive (accessible) green roofs for community benefit. Biodiverse green roofs would accommodate natural plant succession, encourage biodiversity and provide habitat for wildlife. In addition to these ecological benefits, the integration of solar energy generation into roof build up would help to achieve sustainability targets and further diversify ecological conditions.
230. The accessible green roofs would be designed as a series of private communal gardens accommodating a diverse range of spaces and functions. They would be defined by raised planting islands which would provide enclosure and intimacy. Equipped and informal doorstep play areas would be integrated into the designs where possible to encourage social interaction between residents. A condition to secure detailed design of all landscaped areas is recommended.
231. The development proposes the removal of 15 existing trees from the site, largely as a result of the proximity of the existing buildings and basements to their root zones. Their loss would be compensated within the proposed development and the biodiversity of the site would be enhanced through their replacement with new trees planted at a variety of sizes (including some mature and semi-mature). Three trees would be retained. This would be controlled by condition and secured through a Section 278 Agreement.
232. The public realm and streetscape would be fully accessible. Any gradients would be in line with building regulations. The hard landscape material palette would consist of a simple range of natural materials which would be robust and complementary to the industrial heritage of the area. Overall, the landscape proposals are considered high

quality and appropriate for the development of this part of the Old Kent Road. Details of the design, materials and planting proposed would be required by condition.

233. Discussions are ongoing between the developer and the Astley Cooper TRA about potential enhancements to the neighbouring green space on Rowcross Street between the development and Astley House. These will be secured through the S106 agreement. They offer the opportunity to ensure the development directly benefits the existing community.

Design Review Panel:

234. The proposals were presented to the Southwark Design Review Panel on the 11 September 2018. The Panel supported the strategy for height across the site and acknowledged the way it had been arranged in relation to its immediate context. They also expressed their confidence in the designer's ability to deliver a high quality design on this site. Each of their comments is discussed in detail in the following paragraphs.
235. When they considered the layout of the site the Panel felt the east-west connections across the site were successful and responded well to local desire lines. However, they felt that the north-south connections, especially across the Old Kent Road, were less well developed. They felt that the description of the space within the site as a 'street' was not successful as it would be blocked at either end. They felt that further consideration of the role and function of the space at the centre of the site, being at the intersection of these two main local routes/desire lines, has the potential to unlock this issue. In order for the central space to be a successful destination locally it should be apparent from a number of local approaches especially from Burgess Park to the south. The views from Albany Road and from the lake in the park should be tested to ensure that the north-south space at the centre of the site is apparent in the design and massing of the scheme. The Panel challenged the designers to explore this north-south link further, to consider adjustments along the southern edge – facing onto the Old Kent Road, and also potentially to open up the route into the central space in the approach from the south.
236. Officer Response: The designers have fully addressed all of these comments. Connections across the Old Kent Road will be designed in detail through discussions with TfL, and delivered as part of a Section 278 Agreement. The space within the site is no longer thought of as a street, but has been developed in detail as a Central Court. A great deal of further thought has gone into the role and function of this space, as described elsewhere in this report. The design of the ground floor of the hotel has been substantially revised to address concerns about the visibility and accessibility of the Central Court. The active, double height through-lobby is now considered to be one of the most successful elements of the design of this scheme and would create a vibrant and unique connection between Burgess Park, Old Kent Road and the new Central Court. Views from Albany Road and the lake in the park have been assessed in the TVHIA, which is discussed in detail below.
237. The Panel noted that BRE sunlight/daylight studies of the public space had not been presented to them and wanted to understand how sunny and daylit the space within the development would actually feel. They noted that the assessments would help to give the Panel the confidence they need that the proposals are adequate and the public spaces will be generous, attractive and pleasant to use. The Panel felt that the relatively tall (8-10 storeys) perimeter blocks, when considered together with the narrow gaps between them and the modest proportions of the central space (16m at

its narrowest) raised concern about the nature and quality of this principal element of the scheme. Linked to this, the Panel also questioned the sunlight/daylight reaching the residential units around this space, especially those located in the narrow gaps between blocks. They advised that a study of the sunlight levels in the public spaces on the site including the podium garden, as well as those in the residential units would help to better understand the quality of design of this proposal and should be presented to the council going forward and may require a reduction in the massing of the perimeter blocks.

238. Officer Response: A full Daylight and Sunlight assessment has been submitted in support of this application. The results of this assessment show that the Central Court would benefit from good solar aspect and the raised residential garden would receive good exposure to sunlight. The sunniest part of the central court would also be the most sheltered part, which would be of great benefit to the external seating for the cafés proposed on the western side of the square. As described above, through negotiation with Officers, the heights of the perimeter blocks on the eastern edge of the site has been reduced, ensuring better light levels in both the new public realm and surrounding residential properties.
239. In terms of architectural expression, the Panel expressed their confidence in the designer's ability to deliver a high quality design on this site. They wanted to ensure that the quality of the design is embedded in any planning application and also reflected the character of the Old Kent Road. When they considered the architecture of the tower and the mid-rise buildings they agreed that the proposal held some promise to deliver an elegant high quality design. In contrast they felt the hotel building required further development and should respond more directly to the scale and character of its setting on the Old Kent Road. The way each building reaches the ground is a key consideration throughout this proposal. They also considered this to be important for the tower (which will be the focus of a number of approaches and will also form a key focal point from another potential new square on the Tesco site). They advised that the hotel should respond more deliberately to the main approaches from the south and open up views and access to the central space around it.
240. Officer Response: As described above, the design of the ground floor of the hotel has been significantly enhanced in response to concerns raised by the DTP. It is now proposed as an open and inviting through lobby that would create a unique connection between Old Kent Road and the public realm proposed on the site. The design of the upper levels of the hotel has also been reconsidered, with a particular focus on the DRP's concern that it should respond more directly to the character of its setting. A study of the vibrancy of the area was conducted, and this resulted in the proposal to use glass bricks on the hotel façade to create a vibrant and dynamic frontage, that when viewed from one direction would complement the green tones of Burgess Park, and from the other, the red tones of the existing civic and public buildings of the Old Kent Road. The design of the hotel is now considered one of the most successful elements of this scheme, with great potential to create a unique identity and sense of place at this very important urban intersection. The idea of using colour to respond better to place has also been carried through the rest of the design, including the soffits of the tower and mid rise buildings and the public realm itself. The way in which the tower reaches the ground is also considered particularly successful, with a double height glazed lobby grounding it in the central court, and pulling it away from the podium so it is read as a unique urban element set in generous public realm.
241. Finally, the Panel felt the masterplan for the site appeared overly rigid and orthogonal

resulting in a scheme that lacked something in its sense of place. They encouraged the designers to look more carefully at the edges of their site including the main 'threshold' spaces and entrances into the site and asked the designers to consider how these could perhaps respond more deliberately to its non-orthogonal shape and entrance arrangements. They felt that the quality of the design will rely on how it responds to all its street frontages including Humphrey Street, Rowcross Street and Rolls Road and that the arrangement could be freed up a little to help ease the rigour of the design and in that way respond to the more varied character of the Old Kent Road area. Such adjustments could also help to make the masterplan more site specific and with a stronger sense of 'place' that could then also follow through into the elevational approaches. The design appears to be in the 'anywhere in London' style of architecture especially in respect of the tower and the surrounding mid-rise blocks which form quite a consistent piece, and then the hotel which takes a quite different approach. They asked the designers to look more closely at the character of the Old Kent Road area and to try to respond to the special characteristics of the area through design development.

242. Officer Response: In response to these concerns, the masterplan layout and elevational finishes have been revised. In addition to revisions described above, other changes have included:
243. Increasing the quantum of area on the raised residential garden, by having the podium follow the site boundary rather than the geometry of the blocks;;
Adjusting the massing to the south eastern and north western corners of the podium to increase separation distances and provide further increases to the residential garden area; and
Using brick on the building elevations facing Rowcross Street and Rolls Road in response to local context.
244. The Panel did not request a second review of the scheme.

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

245. London Plan (2016) Policy 7.4, Local Character, states that development proposals should respond to their context, including buildings, open spaces, street patterns and the historic environment and Policy 7.8, Heritage Assets and Archaeology, seeks to record, maintain and protect London's heritage assets in order to utilise their potential within the community. It states that development should conserve the significance of any heritage asset it affects. Southwark Core Strategy Strategic Policy 12, Design and Conservation, states that development should ensure that the significance of built heritage assets is conserved. Saved Policy 3.15, Conservation of the Historic Environment of the Southwark Plan (2007) states that development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance and Policy 3.18, Setting of Listed Buildings, Conservation Areas and World Heritage Sites states that the immediate or wider settings of designated heritage assets must be preserved. The NPPF (2019) requires Local Authorities to consider the impact of a proposed development on the significance of a designated heritage asset. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should be categorised as either substantial or less than substantial. Substantial harm should only be permitted in exceptional circumstances. Less than substantial harm should be weighed against the public benefits of the proposal.

246. The application site does not sit in a conservation area and it contains no listed buildings. There are however, a number of conservation areas in the immediate vicinity of the site, to the south on the other side of the Old Kent Road: the Cobourg Road Conservation Area; the Trafalgar Avenue Conservation Area; and the Glengall Road Conservation Area. The Thorburn Square Conservation Area, the Liverpool Grove Conservation Area, the Pages Walk Conservation Area, the Bermondsey Street Conservation Area and the Peckham Hill Street Conservation Area are all within 1km of the application site, meaning that their settings could be impacted upon by the proposed development.

Conservation Area	Distance from site
Glengall Road Conservation Area	Approximately 324m south-east
Trafalgar Avenue Conservation Area	Approximately 144m south-east
Cobourg Road Conservation Area	Approximately 34m south-east
Thorburn Conservation Area	Approximately 187m north-east
Liverpool Grove Conservation Area	Approximately 750m west
Pages Walk Conservation Area	Approximately 700m north-west
Bermondsey Street Conservation Area	Approximately 600m north-west
Peckham Hill Street Conservation Area	Approximately 883m south-east

247. Also within the area surrounding the application site are a number of Grade II listed buildings and structures, including the following:

- Former Fire Station;
- 29 and 31 Cobourg Road;
- 47 - 63 (odd) Cobourg Road;
- New Peckham mosque (former church of St Mark);
- Lord Nelson public house;
- 16 – 64 (even) Trafalgar Avenue;
- 25 – 43 Trafalgar Avenue;
- 1 – 35 (odd) Glengall Road;
- 24-38 (even) Glengall Road;
- 1-9 Glengall Terrace; and
- Phoenix Primary School (formerly Evelyn Lowe School)

248. It is however, important to note that the existing buildings and structures on the application site share no historical relationship with these listed buildings and are not considered to contribute positively to their setting.

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

Property	Description
Numerous properties fronting onto the northern part of Old Kent Road	Building or Feature of Townscape Merit
Thomas a'Becket Public House (320-322 Old Kent Road)	Building of Architectural or Historic Interest

No. 388 (a-c) Old Kent Road	Building or Feature of Townscape Merit
Nos. 2-14 Trafalgar Avenue	Building or Feature of Townscape Merit
Nos. 1- 27 and 33 Cobourg Road	Building of Architectural or Historic Interest
Nos. 358 – 384 Old Kent Road	Building or Feature of Townscape Merit
Church, Cobourg Road/Oakley Place	Building or Feature of Townscape Merit

250. Volume 2 of the submitted ES considers the impact of the proposals on the built heritage of the surrounding area. It concludes that although the proposed development would not have any direct impacts on the fabric of any designated or undesignated heritage assets, the heights of the buildings would result in considerable change in the townscape of the area and would therefore impact on their settings. The impact of this is discussed in greater detail in response to the submitted Townscape, Visual and Heritage Impact Assessment (TVHIA) below.
251. On balance, officers consider that the replacement of the poor quality townscape that currently occupies the application site would enhance the settings of the surrounding heritage assets through the high quality detailed design and material palette proposed and the introduction of new routes and public spaces within the site.

Townscape, Visual and Heritage Impact Assessment (TVHIA)

252. The submitted Townscape, Visual and Heritage Impact Assessment (TVHIA) reports on the impact of the proposed development on 37 views. The views were selected in consultation with Officers in order to ensure the most sensitive views were tested, and include protected views from the London View Management Framework and locally protected views.

London View Management Framework (LVMF) Views

253. London Plan (2016) Policy 7.11, London View Management Framework, and Policy 7.12, Implementing the London View Management Framework, relate to the identified strategic views in London. They state that development should not harm these views, and where possible should make a positive contribution to the characteristics and composition of strategic views. Supplementary Planning Guidance on the LVMF was published in March 2012.
254. The LVMF views likely to be impacted upon by the proposed development are 23A.1 from the Serpentine, 6A.1 from Blackheath Point, 2A.1 from Parliament Hill and 3A.1 from Kenwood.
255. In their Stage 1 response, the GLA noted that the tower would be outside the viewing corridors from the Serpentine and Kenwood House, as well as the locally protected views from Nunhead Cemetery. They requested verified views of protected vista extensions for LVMF 3A.1 and 23A.1. The impact on these views is set out below.

LVMF 23A.1 Bridge over the Serpentine

256. This view is from LVMF viewing location 23A.1 on the bridge over the Serpentine. It is within the Royal Parks Conservation Area. In respect of the protected vista, the LVMF states that development “should not undermine the relationship between the predominantly parkland landscape composition in the foreground and the landmark

buildings at the focus of the view in the middle ground (including the Palace of Westminster and Westminster Abbey). New buildings in the background of the view must be subordinate to the World Heritage Site. Buildings that exceed the threshold plane of the Wider Setting Consultation Area in the background should preserve or enhance the viewer's ability to recognise and appreciate the Palace of Westminster." The view is of high sensitivity.

257. In the initial submission, the verified views from this location showed a temporary sculpture in the lake, which obscured the location of the proposed development. A revised assessment was submitted without the sculpture. This shows that a small part of the top of the tower would technically be visible in this view between the existing tall building cluster at Elephant and Castle. It would however, be heavily screened by trees, and given the distance from the viewing point, be barely perceptible to the naked eye. It would also appear well to the side of the Palace of Westminster, and at a lower apparent height than the Victoria Tower. The viewer's ability to recognise and appreciate the Palace of Westminster would be preserved. No cumulative schemes would be visible. As such, there would be no harm to this strategic view.
258. The submission of the revised view without the floating sculpture addresses the concern that Historic England raised about this view.

LVMF View 3A.1 from Kenwood

259. This view is from LVMF viewing location 3A.1, at the viewing gazebo at Kenwood House, set within an estate bordering Hampstead Heath. The foreground of the view is occupied by open parkland, with a band of mature trees providing a sense of containment beyond. Central London, and particularly the tall buildings of the City, is visible beyond to the left of centre in the view. St Paul's Cathedral is visible to the right of the Shard. The vista towards St Paul's is protected. The view is of high sensitivity.
260. The proposed tower would be visible in the distance, towards the centre of the image, but well to the side of St. Paul's Cathedral. It would be perceived as part of an extensive panorama, at a similar or lower apparent height to that of other tall buildings within the same part of the view. Considered cumulatively, a number of other Old Kent Road schemes would appear in the same part of the view at a similar or greater apparent height, also all read as part of the layered panorama. There would be no harm to this strategic view.

LVMF View 6A.1 from Blackheath Point

261. This view is from LVMF viewing location 6A.1, at Blackheath Point. The view is a panorama towards the City of London. The LVMF guidance here is concerned primarily with St Paul's Cathedral, which is partially visible to the right hand side. The proposed development, particularly the tower, would be visible in the distance on the left side of the view, well to the side of St. Paul's Cathedral. It would appear as part of the extensive panorama and would contribute to the existing layered townscape. Considered cumulatively, a number of other schemes would also be visible, consolidating the layered townscape effect within the view. There would be no harm to this strategic view.

LVMF View 2A.1 from Parliament Hill

262. This view is from LVMF viewing location 2A.1 at the summit of Parliament Hill. The view crosses a wide span of London. The foreground is occupied by the open space of Hampstead Heath. The tall buildings of central London appear in the distance, including the City of London cluster. The vista to St Paul's Cathedral in the centre of the view is protected. The view is of high sensitivity. The proposed tower would be visible in the distance, towards the centre of the view, but well to the side of St. Paul's Cathedral. It would be seen as part of an extensive panorama, at a similar or lower apparent height to other tall buildings within broadly the same part of the view, such as Guy's Hospital and the Blackfriars Tower. Considered cumulatively, a number of other schemes would be visible in the same part of the view, at a similar or greater apparent height, also all read as part of the layered cityscape. There would be no harm to this strategic view.

Tower of London Viewpoint 4

263. This view is identified as Viewpoint 4 in the Tower of London's Local Setting Study. The Tower of London is a World Heritage Site, a Grade I listed building, and falls within The Tower Conservation Area (Tower Hamlets). The view is from an elevated position, on the Inner Curtain Wall (south) of the Tower of London, looking south. Beyond the wall of the Tower in the immediate foreground is the River Thames and riverside walkway. Tower Bridge (Grade I listed) is a dominant feature to the south-east. The southern side of the riverbank is densely developed, including with substantial modern developments at One Tower Bridge and around City Hall.
264. The top of the proposed tower would be visible in the background of the view. It would be a relatively small addition to the view, seen in the context of other relatively modern development to the south of the river. It would not impact on the silhouette of Tower Bridge, the dominance of which would remain unaffected. Considered cumulatively, the Ruby Triangle scheme would also be visible to the east, as would the Tower Bridge Business Complex (obscured by foliage in summer). Both would be of a similar apparent height to the development under consideration here, but neither would undermine the dominance of Tower Bridge. There would be no harm to this view.

Borough Protected Views

265. Although of limited weight, the draft New Southwark Plan Policy P19, 'Borough Views', states that development must positively enhance the borough views which have been identified. The borough views potentially impacted on by the proposed development are the London Panorama of St Paul's Cathedral from One Tree Hill and the linear view of St Paul's Cathedral from Nunhead Cemetery. The draft policy states in both cases that development must "maintain the view of St. Paul's Cathedral from the viewpoint place", "not exceed the threshold height of the view's Landmark Viewing Corridor", and "not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St. Paul's Cathedral and its setting". It also states that a canyon effect of the view of St. Paul's Cathedral must be avoided.

View 4 One Tree Hill

266. This Borough View is from on One Tree Hill in Honor Oak Park, looking towards central London. The view is framed by trees. St. Paul's Cathedral is visible to the east of the Shard (on the left side of the image). Its profile is almost entirely uninterrupted

by development in its foreground. The towers in the City of London appear further west (right). The view is of high sensitivity.

267. The proposed tower would be visible in the distance, towards the centre of the view, but well to the side of St. Paul's Cathedral. It would appear as part of an extensive panorama and would contribute to a layered townscape. As St Paul's Cathedral would remain clearly visible set well to the left of the proposed development, there would be no harm to the significance of this view. Considered cumulatively, a number of other schemes would be visible in the same part of the view. They would consolidate the layered townscape effect and have no impact on the perception of St Paul's. There would therefore be no harm to this protected local view.

View A2 Nunhead Cemetery

268. This Borough View is located in Nunhead Cemetery, within the Nunhead Cemetery Conservation Area. The view is towards St. Paul's Cathedral, with Highgate West Hill beyond it in the distance. The view is framed by trees, specifically maintained to ensure the view is visible. The view is of high sensitivity.
269. Historic England raised concerns regarding the relationship of the proposed hotel to St Paul's Cathedral in this view. They considered that it would obscure much of the middle ground and therefore reduce the viewer's ability to appreciate the Cathedral's landmark status. A formal response was issued by the Southernwood planning team to Historic England acknowledging the importance of this designated local view. In this, they set out that the proposals would be almost entirely seen in front of the existing Guy's Cancer Centre, which has a considerable apparent height in the view. Furthermore, the brise soleil proposed at the top of the hotel would remain below the balustrade level of St. Paul's Cathedral and would be barely visible at this distance due to the lightweight nature of the structure. As a result, the proposals would not interfere with the ability to recognise and appreciate St. Paul's Cathedral and accordingly, it is not considered that there would be any harm to the character of the focus of the view. In the cumulative view, Polymex House on Glengall Road would almost entirely obscure the proposed hotel.
270. It is worth noting that a proposed change to the New Southwark Plan would bring the height threshold in this view down from 52.1m AOD to 45m AOD. This has been considered in the amended TVHIA , and it is demonstrated that this would be of very minimal consequence to the impact of the proposed development and its relationship to St. Paul's Cathedral in this view. The main parts of the hotel block would be below the 45m AOD threshold, with only the brise soleil appearing above it. As mentioned above, the brise soleil would be barely visible at this distance and would remain below the balustrade level of St Paul's.



Telegraph Hill

271. This Borough View is from the top of Telegraph Hill looking towards central London. It is designated as an important local view by the London Borough of Lewisham. In foreground of the view is a grassy park, and terrace of houses. On the horizon, a number of landmark views can be identified. The proposed development would not be visible in this view.

Local Views

272. In addition to the strategic views protected by planning policy, the submitted TVHIA sets out the impact on a number of views within the immediate vicinity of the site. On the whole, in local views the proposed development would result in a high quality and well-proportioned addition to the skyline. It would have a relatively simple yet distinctive form, and a readily identifiable top. The impact on each local view is summarised below.

View 01 - Old Kent Road/Trafalgar Avenue, Looking Northwest

273. This view is from the Old Kent Road, at the corner with Trafalgar Avenue, looking north-west in the direction of the site. It is immediately adjacent to the Trafalgar Avenue Conservation Area. The foreground of the view is occupied by the road junction. The Grade II listed Lord Nelson Public House appears on the southern side of the road, within the Trafalgar Avenue Conservation Area. The view is therefore of some limited heritage significance. The mixture of buildings of different scales, styles and ages is typical of Old Kent Road, and the view lacks any strong sense of coherence and character.
274. The proposed development would appear in the middle ground of the view, to the

north of the Old Kent Road, clearly distinct from the historic development to the south. The tower would be visible behind Astley House, appearing as a singular tall element in the view. It would be well proportioned, slender and vertically articulated. The way in which the frame over sails the final floors of the buildings would provide it with a recognisable top on the skyline. The hotel would also be visible fronting onto the Old Kent Road. From this view point the warm red tones would be visible, signifying the new town centre in this location. As the development would be visually distinct from the designated heritage assets, it is not considered that there would be any harm to this view. Indeed, thanks to the new definition of the street edges and high quality townscape, the impacts of the development would be beneficial.

275. There would be no cumulative harm to this view.

View 02 - Old Kent Road/Oakley Place, Looking Northwest

276. This view is from the corner of Old Kent Road and Oakley Place, looking north-west in the direction of the site. The view point is within the Cobourg Road Conservation Area. It is therefore of some limited heritage significance. It does however lack definition, coherence or character.

277. The proposed hotel building would be visible to the north of the Old Kent Road. The tower would also appear further north on the Site. It would appear well proportioned and slender. The Phase 2 buildings would also be visible. Whilst representing a step change in scale, the proposed development would have a positive impact on the view, and therefore the setting of the designated heritage assets, by improving the general townscape quality and providing a coherent, high quality architectural language. The hotel would also offer definition and animation to the Old Kent Road, where the frontage is currently inactive and hostile. The proposed development would therefore not harm the view or the setting of the heritage assets.

278. There would be no cumulative harm to this view.

View 03 - Albany Road, Looking Northeast

279. This view is from Albany Road, looking north in the direction of the site. Burgess Park lies on the eastern side of the road, and mature trees within the park form a dense canopy of foliage. A school playground lies on the western side of the road in the foreground of the view. The draft locally listed public house at Nos. 320-322 Old Kent Road (the Thomas a'Beckett) is visible to some extent, in the distance, on the corner with Old Kent Road. It is however not considered that the view is of any particular heritage significance. Thanks to the presence of the park and tree foliage however, it is a very attractive view of some sensitivity to change.

280. The proposed development would appear in the middle distance, distinct from the draft locally listed historic pub and behind the tree foliage of the park in the foreground. The proposed tower and hotel would be prominent in the view as layered elements of a high quality new development. The tower would appear slender and well portioned, and both buildings would have a good sense of rhythm and order. From this view point, the green tones of the hotel would be visible, which would compliment the foliage of the park in the foreground. The distinctive top of the hotel building would form a feature in the view, marking the presence of the roof top café/restaurant. Thanks to the high quality design, the proposed development would not harm the view

or the setting of the undesignated heritage assets.

- 281. No cumulative development would be visible.
- 282. The DRP requested assessment of a view from Albany Road.

View 04 - Old Kent Road, between Mina Street and Kinglake Street

- 283. This view is from the southern side of Old Kent Road, at a point between Mina Road and Kinglake Street. The Old Kent Road dominates the foreground of the view. There are draft locally listed 19th century buildings with ground floor retail units on the south side of the road, but they are obscured from view to a significant extent by a street tree. The Tesco supermarket site lies on the northern side of the road, with car parking dominating its setting. As such, the view has a fragmented, poorly defined character and is of no heritage significance or sensitivity.
- 284. The proposed development would be visible in in the middle distance. It would form a coherent new development, and create a more attractive focus in the view than the current supermarket car park (although this would of course remain). As such, the impact would be beneficial. The tower would be visible as a singular and well-proportioned tall building marking the new public realm and potential new tube station. The clearly defined top of the tower would create an attractive silhouette on the skyline. The hotel would be visible on the northern side of Old Kent Road, helping to define and animate it.
- 285. In the cumulative view, part of the Ruby Triangle scheme would be visible in the distance, some way behind the development under consideration here. The Malt Street scheme would also be partially visible through trees. A small part of 365 Old Kent Road would also be visible to the east of the Site. To the limited extent that these schemes would be visible, they would appear together with the proposed development as new layers within the townscape, marking this major area of regeneration. There would not be any cumulative harm to this view.

View 05 - Mandela Way/Dunton Road, Looking Southeast

- 286. This view is from the corner of Mandela Way/ Dunton Road, looking south-east in the direction of the site. Beyond the road junction, the Tesco supermarket occupies most of the view. The view lacks definition and animation. It is of no heritage significance or sensitivity to change.
- 287. The proposed development would appear beyond the Tesco site, in the middle distance. The tower would appear as a well proportioned, singular tall building. Pavilion blocks would be visible behind it at a much lower scale. The Phase 2 buildings would also be visible and would contribute to a coherent overall development. The hotel would appear at the southern edge of the site in the background. Given the poor quality townscape of the view as existing, the proposed development would have a beneficial impact.
- 288. In the cumulative view, the Ruby Triangle scheme would be visible in the distance and, together with the proposed development, would appear as part of a layered townscape marking this major area of regeneration.

View 06 - Rolls Road, Opposite Cooper's Road

289. This view is from the northern side of Rolls Road, near the junction with Cooper's Road, looking west towards the site. Street trees along Rolls Road dominate much of the view. Post-war apartment blocks can be seen on the southern side of the road, obscured by trees. A wall runs along the northern side of the road. The view has no strong compositional qualities or character and is not sensitive to change.
290. The proposed development would appear beyond the post-war apartment blocks, in the middle distance. In summer, it would be partially obscured by tree foliage. The tower would appear as a well proportioned tall building with a distinctive top. The mid rise buildings would be more visible in winter with reduced tree cover. Overall, the proposed development would appear as a coherent, high quality development that would be beneficial to the view.
291. There would be no cumulative harm.

View 07 - Lynton Road, Corner of Chaucer Drive

292. This view is from the northern side of Lynton Road, looking south along Chaucer Drive in the direction of the site. It is dominated by late 20th Century housing estates and is of no heritage significance or sensitivity to change. The towers of the Avondale Estate are visible in the background of the view.
293. The proposed development would appear beyond the 20th Century housing, in the middle ground of the view. The tower would appear as a well proportioned, slender building. The mid rise blocks would also be visible. There would be no harm to this view.
294. In the cumulative view, a very small part of the Malt Street scheme would be visible in the distance, with no meaningful visual relationship with the Proposed Development. There would be no cumulative harm.

View 08 - Willow Walk/Dunton Road, Looking Southeast

295. This view is from Dunton Road, near the junction with Willow Walk. The western side of the road is relatively open, with a high wall. The eastern side of the road is occupied largely by two-to-three storey 19th century buildings in the foreground, with street trees obscuring views (particularly in summer) and more modern apartment buildings further south. Although these buildings aren't listed or in a conservation area, they are attractive. The wider view does not contribute positively to their setting however. The view is therefore of low sensitivity to change.
296. The tower would appear behind one of the 19th Century buildings as a clearly distinct, well-proportioned, singular tall building of high architectural quality, making the location of the new tube station. It would have a clearly defined top and distinctive silhouette on the skyline. Given the low sensitivity of this view to change, it is not considered that the impact would be harmful.
297. There would be no cumulative harm.

View 09 - Marcia Road, Looking Southeast

298. This view is from the western end of Marcia Road, looking east in the direction of the site. Modern three storey buildings line the southern side of the road, while a three-storey, facsimile of 19th century terrace lines the northern side that are copies of the original buildings built in the 2000s. Street trees screen views to a large extent, particularly in summer. The view has a strong sense of coherence thanks to the regular building line and rhythm of the terraced houses. Although they are not designated heritage assets, they are attractive and the view is therefore of some sensitivity to change.
299. The proposed development would be visible in the middle distance, more so in winter than in summer as a result of tree foliage. The tower would appear in the middle distance, behind the coherent roof line of the terraced houses. It would however be clearly distinct, well-proportioned and slender with a distinctive top. Given the fact that the existing buildings are not designated or undesignated heritage assets, it is not considered that the impact on the view would be harmful.
300. There would be no cumulative harm.

View 10 - East Street/Old Kent Road, Looking East

301. This view is from the Old Kent Road, at the junction with East Street, looking east in the direction of the site. A three storey brick building occupies the corner to East Street, on the right side of this view. Beyond Old Kent Road, a modern brick block lines the northern side of the street. The view is of no heritage significance or sensitivity to change.
302. The proposed tower would be visible in the middle distance, beyond the relatively modern buildings. It would appear as a well proportioned, singular tall building, with an identifiable top on the skyline. Given the lack of sensitivity to change, there would be no harm to this view.
303. There would be no cumulative harm.

View 11 - Surrey Square Park, Looking Southeast

304. This panoramic view is from Surrey Square Park, looking north-east in the direction of the site. The grassed area of the park lends the foreground of the view an open quality.
305. Trees around the edge of the park screen views beyond to some extent. Beyond the park, is a handsome five storey red brick apartment block that provides a good degree of enclosure to the view. It is not however a heritage asset. As such, although this is a relatively attractive green view, it is not of any heritage significance and is of low sensitivity to change.
306. The tower would be visible beyond the red brick apartment block, to the far left of the view. It would appear as a well proportioned tall building, clearly distinct from the buildings and open space in the foreground. There would be no harm to this view.
307. No cumulative schemes would be visible.

View 12 - Burgess Park, Near Old Kent Road

308. This view is from Burgess Park, near its entrance on the southern side of Old Kent Road. The grassed areas of the park and routes through it dominate the foreground, with trees providing some screening of views beyond (more sun in summer than winter). Given the importance of Burgess Park, the view is considered to have some sensitivity to change.
309. The proposed development would be very visible in the middle ground of the view. It would appear at a considerably greater apparent scale than the existing buildings on the site, but would clearly lie beyond and distinct from the park itself. Given the quality of design proposed, it is not considered that the impact on this view would be harmful, although given the dominance it would have over the park in the foreground, a carefully balanced judgement is needed.
310. There would be no cumulative harm.



View 13 - Burgess Park, Adjacent to the lake

311. This view is from Burgess Park, adjacent to the lake, looking north in the direction of the site. The lake occupies much of the foreground of the view. Trees around the lake and further in the distance provide a high degree of enclosure to the view, as does the school building to its east. The school building is in the Cobourg Road Conservation Area and is a draft locally listed building. The view is therefore of medium heritage significance and sensitivity to change.
312. The proposed development would appear in the middle distance, beyond a dense tree canopy (particularly relevant in summer), and clearly distinct from the park and school building in the foreground. The hotel building and the tower would be visible, with the

tower appearing as a well-proportioned tall building of high architectural quality. Given the distance of the proposed development from the school building, and its role as a landmark to identify the new tube station, it is not considered that it would result in harm to this view.

313. There would be no cumulative harm.

314. The DRP requested assessment of a view from the lake in Burgess Park.



View 14 - Burgess Park, Multi-route crossing

315. This view is from Burgess Park, at the meeting point of multiple routes that cross it, looking north in the direction of the Site. The routes and the open space of the park occupy much of the foreground of the view, giving it an open quality. Individual trees in the middle ground, and more consolidated groupings of trees in the distance, screen views to some extent. The tall buildings of the Avondale Estate and the Bermondsey Works tower are visible in the distance. There are no heritage assets in or impacted upon by this view, but given the importance of Burgess Park, it is still considered sensitive to change.

316. The proposed development would appear in the middle distance, beyond the dense tree canopy (in summer), and clearly distinct from the park in the foreground of the view. It would be perceived as sitting at the end of the route out of the park, thus emphasising its landmark role on the skyline. In this capacity, its impact would be beneficial in terms of legibility and wayfinding. It is not considered that it would be harmful.

317. In the cumulative view, the Ruby Triangle and Malt Street schemes would appear further south and west of the development under consideration here. Given their distance from the viewing point, and the screening effect of the trees in the foreground

(particularly in summer), they would have a much lesser impact on the view, and there would be no visual coalescence. As such, there would be no cumulative harm.



View 15 - Cobourg Road, Looking North

318. This view is from the western side of Cobourg Road, looking north in the direction of the site. It is immediately adjacent to the Cobourg Road Conservation Area and looks towards buildings within it. Some of these buildings are Grade II listed. Trees screen views to a large extent, particularly in summer, although the Shard is visible in the distance to the far left of the image. The view is of medium heritage significance and sensitivity to change.
319. The proposed development would appear in the middle distance. It would be partially screened by tree foliage, but would be more visible in winter when the leaves are not on the trees. The hotel would be partially visible at the southern edge of the Site, indicating the location of Old Kent Road. The top of the hotel building would be light and distinctive. The tower would be visible behind the hotel, at the centre of the view. As in other views it would be perceived as a well proportioned tall building of high architectural quality, with an identifiable termination on the skyline. It would also help to mark the location of proposed public space within the site and the new Bakerloo Line station. It would however also represent an incongruous modern insertion into this otherwise uninterrupted historic view (other than the distant Shard). The obvious contrast with the lower scale historic buildings in the view would result in a harmful impact. As defined by the NPPF, this harm would be less than substantial and it would be outweighed by the wider regeneration benefits of the proposals. On balance therefore, whilst it is considered that there would be an adverse effect in this view, it would not represent a reason to withhold planning permission.
320. There would be no cumulative harm.

321. Historic England identified this as a view in which the 48 storey tower would have a major visual impact that would cause harm to the view. Whilst they identify that this harm would be less than substantial harm in NPPF terms, they raise concern about the cumulative impact on a range of heritage designations. As described above, Officers agree with Historic England's assessment that the impact on this view would result in less than substantial harm, but conclude that this would be outweighed by the wider regeneration benefits of the proposals. Officers do not consider that there would be cumulative harm in this case.



View 16 - Oakley Road, Corner of Nile Terrace

322. This view is from Oakley Place, at the entrance to Burgess Park and the Cobourg Road Nature Area, looking north in the direction of the site. It is immediately adjacent to the Cobourg Road Conservation Area and looks towards buildings within it. The western side of Oakley Place is lined by a terrace of draft locally listed 19th century houses in stock brick, which are of a consistent appearance. A draft locally listed church building sits north of the terrace, just south of the junction with Old Kent Road. A square lies on the eastern side of the road, and trees within it screen views beyond (particularly in summer). The view is of medium heritage significance and subsequently sensitive to change.
323. The proposed development would appear beyond the buildings and open space on Oakley Place. It would be partially screened by tree foliage (less so in winter). The hotel would appear at the southern edge of the Site, indicating the location of Old Kent Road. The tower would be visible behind the hotel, and would become the focus of the view. As above, it would be perceived as a well-proportioned tall building of high architectural quality and it would help to mark the location of proposed public space and tube station, but it would also represent an incongruous insertion into this sensitive view. Once again, the impact would therefore be harmful as a result of the visual contrast with the lower scale historic buildings, which as existing form a

coherent and relatively self contained composition. As defined by the NPPF, this harm would be less than substantial and it would be outweighed by the wider regeneration benefits of the proposals. On balance, therefore whilst it is considered that there would be an adverse effect in this view, it would not represent a reason to withhold planning permission.

324. There would be no cumulative harm.



View 17 - Trafalgar Avenue, Intersection with Waite Street

325. This view is from Trafalgar Avenue, looking north in the direction of the site. The viewpoint is outside the Trafalgar Avenue Conservation Area, but looking towards buildings within it. An open space forming part of the wider Burgess Park is visible on the eastern side of the road, in the foreground of the view. Mature trees within the park and further along Trafalgar Avenue obscure views to a significant extent (particularly in summer). The post-war Astley House is also visible. The view is considered to be of some heritage significance and therefore some sensitivity to change.

326. The proposed development would appear in the middle distance. It would be heavily screened by tree foliage in summer, but considerably less so in winter. The hotel would be partially visible in winter, indicating the location of the Old Kent Road. The tower would appear behind the hotel, although it would be largely obscured from sight in summer. In winter, it would appear as a well proportioned tall building of high architectural quality with a readily identifiable termination on the skyline. It would mark the proposed public space and tube station, but it would also represent an obvious and incongruent contrast with the lower scale historic buildings in the view (primarily in winter). It would therefore have a harmful impact. This harm however, would be less than substantial and would be outweighed by the wider regeneration benefits of the proposals. On balance, therefore while it is considered that there would be an adverse effect in this view, this would not represent a reason to withhold planning permission.

327. No cumulative schemes would be visible in this view.
328. Historic England identified this as a view in which the 48 storey tower would have a major visual impact that would cause harm to the view. Whilst they identify that this harm would be less than substantial harm in NPPF terms, they raise concern about the cumulative impact on a range of designations. As described above, Officers agree with Historic England's assessment that the impact on this view would result in less than substantial harm, but conclude that this would be outweighed by the wider regeneration benefits of the proposals. Officers do not consider that there would be cumulative harm in this case.



View 18 - Glengall Road, Looking Northwest

329. This view is from Glengall Road looking north in the direction of the site. The viewpoint is located within the Glengall Road Conservation Area. The end of a draft locally listed 19th century terrace of three storey brick buildings appears in the foreground of the view, on the western side of the road, with a Grade II listed two storey brick building occupying the corner with Glengall Terrace. Trees obscure the visibility of the housing further along the street which would be more visible in the winter months. The view is of medium heritage significance and is therefore sensitive to change.
330. The upper section of the tower would be visible in summer, and more of the lower parts of the building would be seen in winter. It would appear in the middle distance as a well-proportioned tall building of high architectural quality and landmark importance. It would however, also represent an incongruous addition to the view, in obvious contrast with the lower scale historic buildings. Although it would be clearly distinct from the heritage assets, it would result in some harm the view. This harm would however, be less than substantial and would be outweighed by the wider regeneration benefits of the proposals. On balance, therefore while it is considered that there would

be an adverse effect in this view, it would not represent a reason to withhold planning permission.

331. There would be no cumulative schemes visible in this view.

332. Historic England identified this as a view in which the 48 storey tower would have a major visual impact that would cause harm to the view. Whilst they identify that this harm would be less than substantial harm in NPPF terms, they raise concern about the cumulative impact on a range of designations. As described above, Officers agree with Historic England's assessment that the impact on this view would result in less than substantial harm, but conclude that this would be outweighed by the wider regeneration benefits of the proposals. Officers do not consider that there would be cumulative harm in this case.



View 19 - Old Kent Road/Olmar Street, Looking Northwest

333. This view is from Old Kent Road, at the junction with Olmar Street, looking north-west in the direction of the site. The road junction occupies much of the foreground of the view, with a low scale fast food restaurant unit, and brick office/light industrial buildings seen beyond. The northern side of the road is occupied by residential buildings of various ages, styles and scales. The view lacks a coherent character and is not of heritage significance or sensitive to change.

334. The proposed tower would appear in the middle distance. It would be partially screened by tree foliage (less so in winter). The hotel would be partially visible. The tower would be well proportioned and slender, with a distinctive top and would fulfil a useful wayfinding purpose. As such, the impact on the view would be beneficial.

335. No cumulative schemes would be visible.

View 20 - Peckham Hill Street/Commercial Way, Looking Northwest

336. This view is from Peckham Hill Street, at the junction with Commercial Way, looking north in the direction of the site. While the viewpoint is located outside the Peckham Hill Street Conservation Area, the western side of the street (left in the image) lies within it. Beyond the road junction, the western side of the street is largely occupied by historic terraces (with some modern infill) and has a coherent quality, with a consistent scale and building line. The terrace of four stock brick houses immediately north of the road junction is Grade II listed. The eastern side of the street is largely occupied by low scale post-war housing. The view is of medium heritage significance and therefore sensitive to change.
337. The proposed development would appear at some distance, beyond the post war housing. It would be visually distinct from the Conservation Area and listed buildings. It would also be heavily screened from view by tree foliage in summer. Although the view is sensitive to change, given the position of the proposed development relative to the heritage asserts and its distance from the viewing point, the impact would not be harmful.
338. There would be no cumulative harm.

View 21 - St. James's Road, Looking Down Rolls Road

339. This view is from St. James's Road, at the junction with Rolls Road looking west in the direction of the site. It features an assortment of disparate buildings including the Grade II listed Phoenix Primary school (formerly Eveline Lowe School). The heritage significance of this listed building lies with its internal layout rather than its external appearance however, so it is not considered that this view is of any particular heritage significance or sensitivity to change. Overall, the view has an incoherent character.
340. The proposed tower would be visible in the middle distance, at a very similar apparent height to a tower within the Avondale Estate. It would however, be readily distinguishable from the existing tower, due to its contrasting architectural expression. As such, there would be no harm to this view.
341. The Bermondsey Service Station scheme would appear in the foreground of this view at a considerably greater apparent scale than the Proposed Development. Given the low sensitivity of the view to change, there would not be any cumulative harm.

View 22 - Ilderton Road, Near South Bermondsey Station

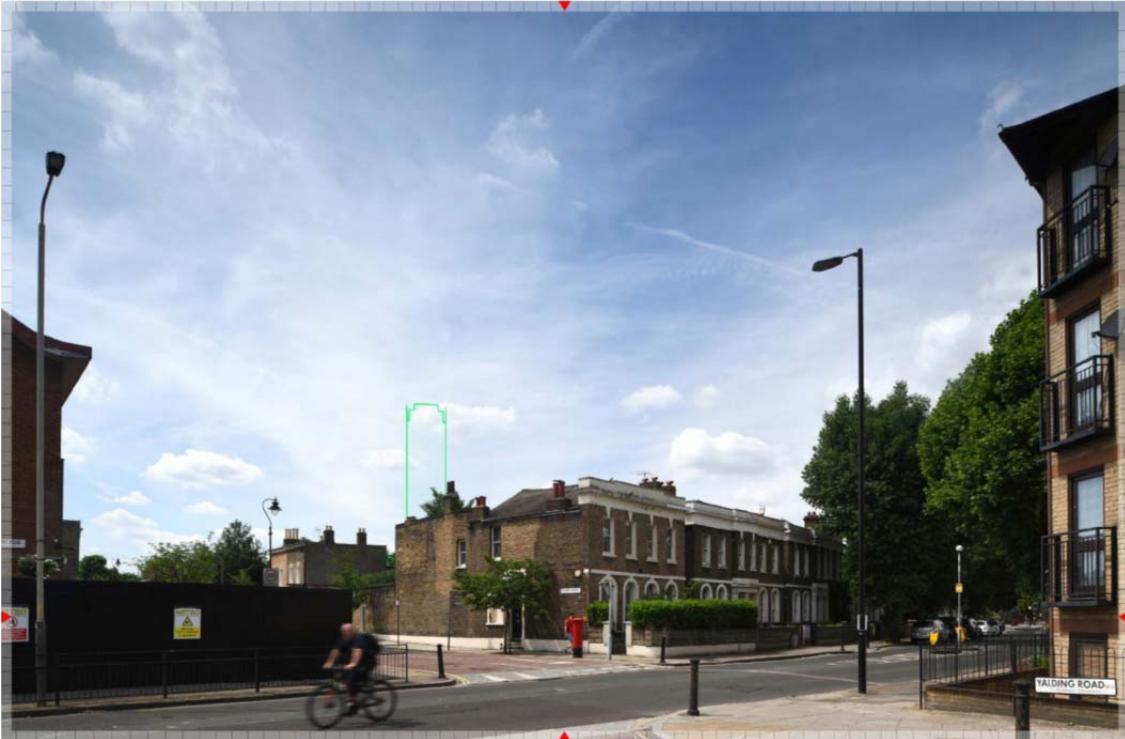
342. This view is from the southern side of Ilderton Road, near the entrance to South Bermondsey Station, looking west in the direction of the site. The northern side of the road is lined by terraced development with ground floor retail units. Housing blocks built in relatively recent decades are visible further into the middle distance. It is not of any heritage significance or sensitivity to change.
343. The proposed tower would be visible in the distance, partially obscured by tree foliage in summer. It would clearly lie in the distance, and would form a minor point of visual interest. There would be no harm to the view.
344. No cumulative schemes would be visible.

View 23 - Thorburn Square, Looking West

345. This view is from Thorburn Square, looking southwest in the direction of the site. The viewpoint is located in the Thorburn Square Conservation Area, but as the square is surrounded by continuous three storey post-war housing of no particular visual quality, it is only considered to be of limited heritage significance of sensitivity to change.
346. Given this, although the top of Block 1A would appear in the middle distance, behind the post-war blocks around Thorburn Square, it is not considered that there would be any harmful impact on this view.
347. No cumulative schemes would be visible.

View 24 - Southwark Park Road, Opposite Reverdy Road

348. This view is from the northern side of Southwark Park Road, at the junction of Yalding Road and opposite Reverdy Road, looking south in the direction of the site. A four storey, relatively modern apartment block lies on the corner with Yalding Road, framing the right edge of the view. Historic terraced properties of a relatively consistent scale and with a consistent building line are evident on the southern side of Southwark Park Road and heading south along Reverdy Road. These fall within the Thorburn Square Conservation Area.
349. Conservation Area. The view is therefore of medium heritage significance and sensitivity to change.
350. The proposed tower would be visible in the middle distance beyond the flank walls of terraced brick housing in the Conservation Area. Despite the high quality design and landmark qualities of the new tower, it would still represent an incongruous addition to this sensitive view and would therefore have a harmful impact. The harm would however be less than substantial and outweighed by the wider regeneration benefits of the proposal. On balance therefore, this harm would not represent a reason to withhold planning permission.
351. No cumulative schemes would be visible.
352. Historic England identified this as a view in which the 48 storey tower would have a major visual impact that would cause harm to the view. Whilst they identify that this harm would be less than substantial harm in NPPF terms, they raise concern about the cumulative impact on a range of designations. As described above, Officers agree with Historic England's assessment that the impact on this view would result in less than substantial harm to a range of designations, but conclude that this would be outweighed by the wider regeneration benefits of the proposals. Officers do not consider that there would be cumulative harm in this case.



View 25 - Rodney Road, Intersection with Catesby Street

353. This view is from Rodney Road, looking south-east in the direction of the site. The Roman Catholic Church of the English Martyrs and the Presbytery to the Church, both Grade II listed, appear on the southern side of the road. The view is therefore of medium heritage significance and sensitivity to change.
354. The proposed development would not be visible in summer view. In winter, it would be visible only to a small extent, largely obscured by a tree, and seen in the distance beyond post-war housing blocks. It would not impact upon the listed buildings and would cause no harm to this view.
355. No cumulative schemes would be visible.

View 26 - Mandela Way, Near TNT London City Depot

356. This view is from Mandela Way, looking south-east in the direction of the site. In the summer, street trees screen views of warehouses and light industrial buildings to a significant extent, although some are visible together with a car park. The view is not of heritage significance or sensitive to change.
357. The proposed development would appear beyond the warehouses along Mandela Way, in the middle ground of the view. It would be heavily screened from view by tree foliage, particularly in summer. Given the low sensitivity of the view and the wayfinding and legibility advantages of the proposed tower, the impact would be beneficial.
358. There would be no cumulative harm.

View 27 - Guinness Square, Towards Page's Walk

359. This view is from Guinness Square looking east, in the direction of the site. Guinness Square is a post-war housing estate arranged around a car park in the foreground of the view. In the middle distance, a terrace of two storey houses within the Page's Walk Conservation Area is visible. These are consistent in scale and appearance, and appear as a distinct townscape element beyond the estate. This is however, not the optimum place from which to appreciate these houses, so the view is considered to be of limited heritage significance and limited sensitivity to change.
360. The proposed tower would be visible in the distance over the distinctive roofline of the Pages Walk houses. As described above however, there are better vantage points from which to appreciate these houses, so on balance, the impact on this view would not result in any harm.
361. A number of cumulative schemes would be visible in the view, over the roof of the Pages Walk houses. In theory, they could be considered to add to the potential harm to this view but, as described above, as there are better places from which to appreciate the heritage significance of these houses, the on balance assessment made above remains pertinent. As such, and on balance, there would be no cumulative harm.
362. Historic England identified this as a view in which the 48 storey tower would have a major visual impact that would cause harm to the view. Whilst they identify that this harm would be less than substantial harm in NPPF terms, they raise concern about the cumulative impact on a range of designations. As described above, Officers do not agree with Historic England's assessment that the impact on this view would result in less than substantial harm, given the setting of the view point.



View 28 - Page's Walk/Willow Walk, Looking Southeast

363. This view is from Willow Walk, opposite the junction with Page's Walk, looking south-

east in the direction of the site. The corner of Page's Walk and Willow Walk is occupied by the two storey element of a former stables building at Nos. 1 to 8 Willow Walk. It is in brick and has a long single storey range extending south along Page's Walk. A single storey brick warehouses lies on the northern side of Willow Walk. The buildings at Nos. 1 to 8 Willow Walk lie within the Page's Walk Conservation Area. The view is of medium heritage significance and sensitivity to change.

364. The proposed tower would be visible in the background of the view (more so in winter than summer as a result of tree foliage). It would be perceived as lying in the distance, distinct from the brick warehouse buildings in the foreground. It would not break the roof line of any of the historic buildings. As such, it is not considered that the impact on the view would be harmful.
365. In the cumulative view, the London Square Bermondsey scheme would appear to the north of Willow Walk, at a substantially greater apparent scale than the existing buildings to its south and the development under consideration here. Other schemes, such as Malt Street and Cantium would also be visible, but not to the degree that they would be considered to cause cumulative harm.

View 29 - Bermondsey Street/Decima Street, Looking Southeast

366. This view is from the junction of Bermondsey Street and Decima Street, looking south-east in the direction of the site. It is located within the Bermondsey Street Conservation Area and therefore of some heritage significance and sensitivity to change. The proposed development would not be at all visible however, so there would be no harm. No cumulative schemes would be visible either.

View 30 - Bricklayers Arms Roundabout, Great Dover Street

367. This view is from the Bricklayer's Arms roundabout, on the north-western side, looking east in the direction of the Site. It is of low visual quality and not sensitive to change.
368. The upper part of the proposed tower would be visible in the distance, but given the low sensitivity of the view, no harm would be caused. The landmark qualities of the proposed building would be beneficial.
369. No cumulative schemes would be visible.

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

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

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
LVMF Views	No harm identified
Tower of London Views	No harm identified
Local Views	No harm identified
Glengall Road Conservation Area	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Trafalgar Avenue Conservation Area	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Cobourg Road Conservation Area	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Thorburn Conservation Area	No harm identified
Liverpool Grove Conservation Area	No harm identified
Pages Walk Conservation Area	No harm identified by LBS Officers, but less than substantial harm identified to setting by HE.
Bermondsey Street Conservation Area	No harm identified
Peckham Hill Street Conservation Area	No harm identified
Listed Buildings	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Draft Locally listed buildings/ undesignated assets identified in the draft Old Kent Road AAP	Some less than significant harm identified to setting, outweighed by the wider regeneration benefits of the proposals.

372. In their consultation response on the scheme, Historic England raised the concern that, whilst the impact on each heritage asset is considered less than substantial in NPPF terms, the cumulative impact of the development on the wide range of designations in the vicinity is of concern. As set out in the report above, Officers agree that there would be adverse impacts on some sensitive views from heritage assets, including Conservation Areas and their settings, and the settings of Listed Buildings. Historic England also consider that there would be harm to the locally protected view from Nunhead Cemetery. Whilst Officers do not agree with the Nunhead Cemetery assessment, it is however also acknowledged that, given there would be an adverse impact on a range of heritage assets, cumulative harm in this sense should also be assessed. In doing so, it is important to note that the views assessed in the TVHIA were identified for the likelihood of the proposed development being visible, rather than necessarily being the most important or sensitive views impacting upon the relevant Conservation Areas. There would be many points in these Conservation Areas from which the proposed development would not be visible at all.

373. It is also worth noting that, whilst it important to preserve the settings of designated and undesignated heritage assets, the settings themselves are not designated. The importance of the settings, and therefore the degree of protection they should be

offered, depends on the contribution they make to the significance of the heritage assets themselves. On balance, it is considered that the significance of the heritage assets under consideration is not unjustifiably undermined by the ability to see beyond them to clearly distinct, large-scale modern development. In many of the heritage assets under consideration, their context is already varied and densely developed. Indeed, as identified above, the improved townscape offered by the development under consideration would be beneficial to the settings of the heritage assets.

374. As such, whilst it is concluded that there would be some adverse, and therefore harmful impacts to the settings of some of the heritage assets surrounding the proposed development, even when considered cumulatively (in the sense set out above), this harm would be less than substantial and far outweighed the wider regeneration benefits of the proposals. As such, it is considered to accord with the NPPF (2019).
375. Historic England also raised concerns about the consideration of this application in the absence of an adopted strategy for the area, which they consider to conflict with their tall building guidance and Paragraph 185 of the NPPF. Throughout the assessment of the tall buildings proposed set out in this report, the very limited weight of the draft Old Kent Road Area Action Plan has been acknowledged. It is nonetheless considered important in guiding a vision for the Opportunity Area, and therefore of some relevance to determining applications here. It is also worth noting that, whilst the OKR AAP is still in draft, the Old Kent Road Opportunity Area was formally identified in the Further Alterations to the London Plan in 2015, which have been incorporated into the current London Plan (2016). In addition, the adopted Southwark Core Strategy (2011) identifies Old Kent Road as an action area setting out that the area will be subject to substantial regeneration.
376. Whilst limited weight has been given to emerging policy, full weight has been given to adopted policies, including the NPPF (2019), London Plan (2016) and Southwark Plan (2007) and Core Strategy (2012). As can be seen from the assessment contained within this report, the proposals are considered to be in compliance with these adopted policies, although in some cases relating to impacts on heritage assets, on balance judgements are needed.
377. In conclusion, the proposed development would have a significant impact on many of the views assessed, becoming a highly visible feature in the surrounding townscape. However, in the majority of cases, the impact is not considered to be harmful. Indeed in many views it is considered beneficial. The quality of design would be high, with a good composition of buildings, strong vertical emphasis and characterful tops creating new interest on the skyline.
378. There is however six views where either Southwark Officers or Historic England (or both in the majority of cases) consider that there would be some less than substantial harm to townscape and heritage significance. Neither Southwark Officers nor Historic England considers that this harm would be 'substantial', as defined by the NPPF. Southwark Officers do not consider that the degree of harm would warrant refusal of this planning application, as that harm would be outweighed by the other substantial regeneration benefits of this proposal.

Trees

379. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
380. The submitted arboricultural impact assessment proposes the removal of fifteen trees on the site, including one to the Old Kent Road corridor. A further four trees were found to be in such a poor condition with limited life expectancy that they have been classified as Category U (British Standard BS5837: 2012 Trees in Relation to Design, Demolition and Construction – Recommendations) and recommended for removal irrespective of the proposed development.
381. Three trees (T8, T9 and T16) will be retained and integrated into the development. Sufficient space and adequate protection measures have been set out to ensure that these retained trees are not damaged during the pre-construction and construction phase and to enable their successful development post-construction.
382. The tree strategy submitted in the Design and Access Statement proposes the delivery of new trees across the enhanced public realm that would equate to a net gain in tree canopy cover when compared to the existing. This is a positive biodiversity benefit of the proposals.
383. To further mitigate the loss of existing trees, a large number of the replacements would be planted at semi mature sizes, details of which can be reserved by condition. Tree planting on the upper level podium gardens would be planted in consideration of size, and blocking sunlight.

Housing mix

384. Strategic Policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% 2+ bedroom units and 20% 3+ bedroom units. No more than 5% studio units can be provided and these can only be for private housing. The draft OKR AAP and NSP policies also include the same mix requirements. The proposed overall housing mix and affordable housing mix is detailed below.

	Market units	Affordable – Intermediate units	Affordable - Social Rent units	Total units
Studio	18	0	0	18
1-Bed	184	36	58	227
2-Bed	266	28	44	338
3-Bed	38	7	46	91
Total	505	71	148	724

385. Table: Overall housing mix

Unit size	No. of units	% Units
Studio	18	2%
1 bed	277	38%

2 bed	338	47%
3 bed	91	13%
Total	724	100%

386. Table: Affordable housing mix

Unit size	No. of units	% Units
Studio	0	0%
1 bed	140	43%
2 bed	122	33%
3 bed	98	24%
Total	219	100%

387. At 2%, the number of studio flats is well within the 5% limit and so is acceptable. 60% of units would have two or more bedrooms and this meets the 60% target. Overall, just 14% of the units would have three or more bedrooms, which is below the 20% requirement. For the affordable housing however, 57% of the units would have two or more bedrooms and 24% would have three bedrooms or more. So whilst there is a slight shortfall in two and three bedroom units overall, the percentage of three bedroom units in the affordable housing mix would be fully compliant. The housing mix is therefore found to be acceptable.

Wheelchair housing

388. Saved policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users and London plan policy 3.8 requires 90% of new housing to meet Building regulations M4(2) “accessible and adaptable” and 10% to meet Building Regulations M4 (3) “wheelchair user dwellings”. This is reiterated in emerging policy in the draft OKR AAP and the NSP.

389. 75 wheelchair units (10.3%) would be provided to meet the M4 (3) standard, and secured by the legal agreement. 37 will be delivered during Phase 1 and 38 will be delivered during Phase 2. The units would be provided in the social, intermediate and private tenures in a range of unit sizes. The social rented and intermediate units would be required to be fully fitted for first occupation, with private units being adaptable. 90% of the units would achieve the M4 (2) standard, meeting the 90% target. The only units that would not meet the M4 (2) standard are the 7 maisonettes in Phase 1 where step free access would not be possible unless a stair lift was fitted.

Quality of accommodation

390. Saved Policy 4.2 of the Southwark Plan states that development should achieve good quality living conditions and include high standards of accessibility, privacy and outlook, natural light, ventilation, space, safety and security and protection from pollution. This policy is further reinforced by the Residential design Standards SPD 2011 (including 2015 Technical Update).

391. All of the proposed dwellings have been designed to a high standard to ensure appropriate living accommodation for residents.

Unit size

392. 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.

393. The following table sets out the minimum flat size requirements as set out in the Residential Design Standards 2011, and also the flat sizes that would be achieved:

Unit Type	SPD (sqm)	Size Range (sqm)
Studio	36	37
1 Bed (flat)	50	50-53
2 Bed (flat)	61-66	70-80
3 Bed (flat)	74-85	96-125

394. The flat sizes meet and in most cases significantly exceed the standards as set out in the SPD. Space has been allocated for storage and all kitchens enjoy natural light and ventilation. The bathrooms are primarily mechanically ventilated and artificially lit, but this is not unusual for a relatively dense flatted scheme.

395. Every unit meets the minimum floorspace standard or exceeds it as follows:

396. In addition, all of the three bedroom affordable units include the following:
separate kitchens and dining rooms;
provision for washing machines to be locate in hall cupboards instead of the kitchen;
general storage to be accessed off the dwellings circulation space and not off bedrooms;
storage cupboards no deeper than 1m for ease of use; and
private amenity space located off the living area.

397. Overall, it is therefore considered that the flat sizes and layouts accord with policy, and would provide for a very good standard of accommodation.

Dual aspect

398. The percentage of dual aspect would be acceptable at 50%. It should be noted that Phase 1 delivers 53%, while the outline phase 2 delivers 40% as a result of the long plan form. Whilst the single aspect flats would have a sole frontage to public highways, public realm or the podium, this would be mitigated by deep balcony reveals that would allow light to additional habitable rooms.

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

Internal daylight

400. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using

the Average Daylight Factor (ADF). ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.

401. The submitted daylight report demonstrates that the internal daylight provision within the development is “very good”. Across all the buildings, 88% of the habitable rooms will enjoy an Average Daylight Factor above that recommended by the BRE guidelines. This is considered a good level of compliance for a scheme of this size and density.



Overlooking within the scheme

402. 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.
403. The internal distances across the podium block range from 7m to 11m. While it is acknowledged that the internal distance across the communal podium does not meet this guidance, the layout and orientation of the pavilion blocks have been carefully organised to minimise overlooking and overshadowing between blocks in terms of internal layout, the location of habitable rooms such as bedrooms, and the offsetting of

windows and balconies. Furthermore, the majority of podium facing units are dual aspect to allow a variety of external views. These are positive features of the scheme.

404. It is therefore considered that the overlooking distances within the scheme are acceptable, when taking into account the mitigating factors of the design.

Amenity space

405. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10 sqm per child bed space (covering a range of age groups). In addition, emerging policy 10 of the AAP states that each dwelling should make a contribution of 5sqm towards open space.

406. In terms of the overall amount of amenity space required, the following would therefore need to be provided:

Private amenity space. For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD; and for units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;

Communal amenity space. 50sqm communal amenity space per block as required by the SPD; and

Children's play space. 10sqm of children's play space for every child space in the development as required by the London Plan.

Public open space. 5sqm of public open space per dwelling as required by the OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private amenity space

407. This comprises private balcony and terrace space which is for the use of the home associated with that balcony, terrace or garden

408. A positive aspect of the scheme is that all units have been provided private amenity space in the form of a balcony, garden or terrace Provision in four of the blocks meets or exceeds the required standard, while Blocks 1A and 1B have a slight underprovision. However, there are some instances where the one, two and three bed units do not provide the full 10sqm and therefore this shortfall must be provided elsewhere as communal amenity space. The table below sets out the proposed private amenity space in each block.

409. Table: Private amenity space by Block

Block	Units	Required private amenity space sqm	Proposed sqm	Private amenity space shortfall sqm
Block 1A	344	3440	2914	526
Block 1B	93	930	750	180

Block 1C	52	520	584	-64
Block 1D	52	520	553	-33
Block 2A	84	840	841	-1
Block 2B	99	990	1022	-32
Total	724	7240sqm	6664sqm	706sqm

410. Overprovision in blocks 1C, 1D, 2A and 2B does not count against shortfall, as residents in blocks 1A and 1B would not be able to use these private spaces.

Communal amenity space

411. This comprises amenity space which is accessible to flats within the development so is a shared space, but which isn't accessible to the general public.

Where the full recommended provision of 10sqm of private amenity space per residential unit has not been provided, the shortfall must be added to the communal requirement. In addition, the SPD requires 50sqm per block, of which six blocks are proposed (total 600sqm). The total amount of communal amenity space that would be required is therefore 600sqm.

412. In total, 1399sqm of external community amenity space would be provided across the site, which meets the required amount of space. This would be podium gardens and the roofs of the residential blocks. 493sqm of further amenity space would be provided within internal communal 'rooms'.

Public open space

413. This space is fully open to the public. Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open space per dwelling. This would amount to 3620sqm based on the 724 units proposed. In total, 4035sqm of public open space would be provided across the ground floor of the proposed development and includes the new central square and adjoining civic spaces. This offer is consistent with the draft policy.

414. Table: Public open spaces

Public open space	Proposed Area	Required Area (sqm)	Excess
Phase 1	2,099	/	/
Phase 2	1,936	/	/
Total	4,035sqm	3620sqm	415sqm

Children's play space

415. This space can be in both the communal areas and also in the publically accessible open space. In this instance it is split between the two.

416. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG, the development would be expected to contribute 1940sqm of children's play space, based on the requirement for 10sqm for every child (total 194 children). The child yield calculation is as set out in the following table.

Table: Child yield calculation

417.

Age group	Number of children
Under 5	97
5 to 11	60
12+	37
Total	195

418. In total, 1,125sqm of children's playspace would be provided in the development, as detailed in the table below. The level of provision falls below the required provision of 1,940sqm by 815sqm and is accordingly a financial contribution of £123,065 (815sqm x £151.00) is required to overcome the underprovision.

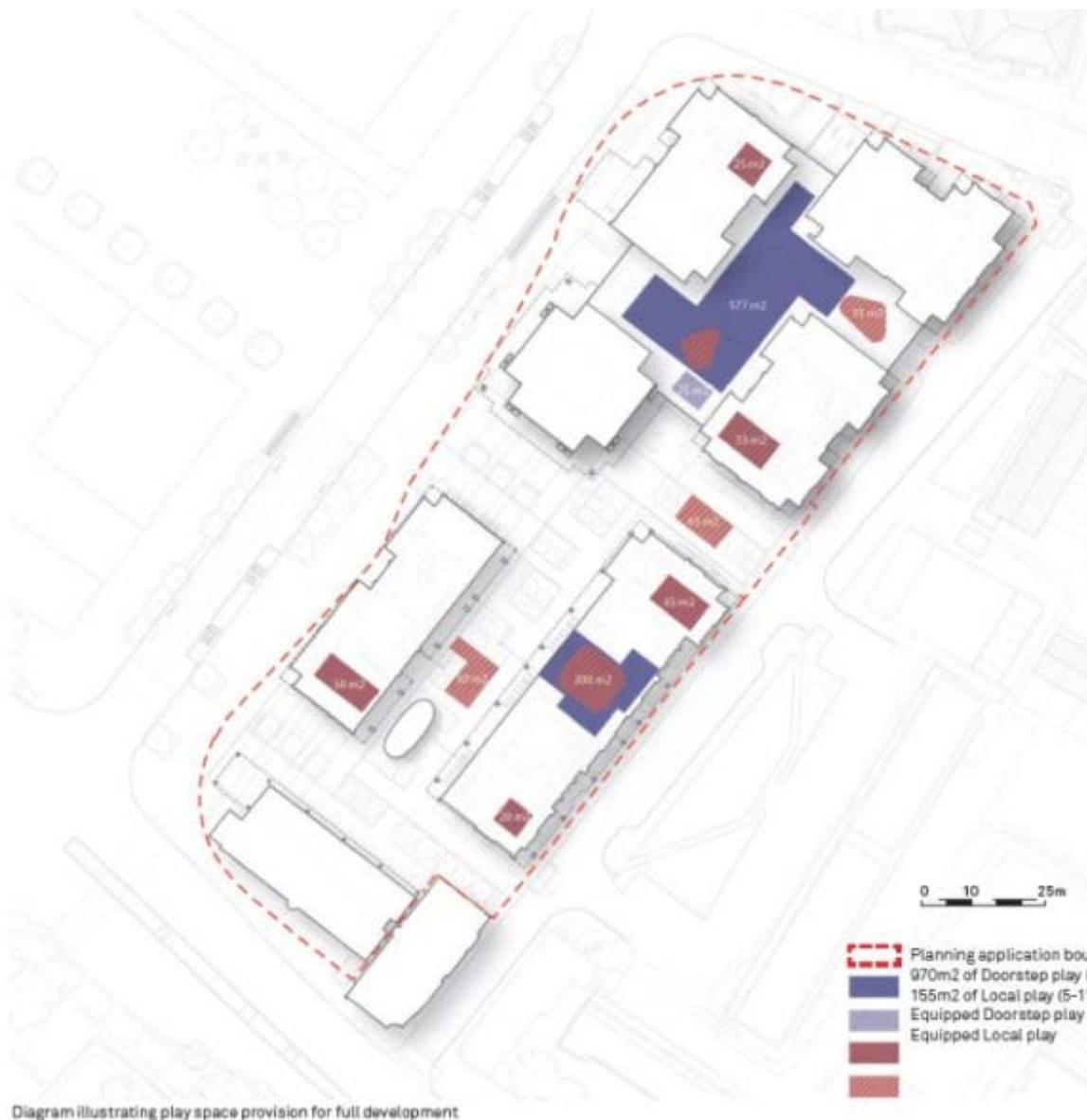
419. Discussions with developer, leisure services and neighbouring TRAs will determine what this money will be spent on locally. Given the proximity of the scheme to Burgess Park its likely that would primarily provide play provision for older children.

Table: Children's playspace

420.

Age group	Area required	Area provided	Shortfall
Dedicated under 5's	970sqm	970sqm	0sqm
Dedicated 5-11's	600sqm	155sqm	455sqm
Dedicated 12+	369sqm	0sqm	369sqm
Total	1949sqm	1125sqm	815sqm

421. Designated equipped play space for all ages would be provided and play features would be fully integrated into the landscape design to provide an attractive and versatile public realm. As well as incorporating play space within the Phase 1 podium courtyard and roof gardens of Blocks 1B and 1D in Phase 1 and Blocks 2A and 2B would also include some provision. In addition, informal play opportunities would be incorporated throughout the public realm in the form of playful furniture such as the benches found on the Southbank and open spaces for active play.



422. Further design details of the proposed play space within the scheme will be secured by condition.

Overshadowing

423. An overshadowing analysis has been carried out of all public and communal and outdoor areas within the site. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least 50% of the area should receive at least two hours of sunlight on 21 March.

424. The overshadowing results show that the proposed communal amenity spaces will enjoy slightly less sunlight than that suggested by the BRE guidelines as they will not quite receive 2 hours of sun on ground to over 50% of their area on 21 March. However, in the summer months, which is considered the time of the year when these amenity spaces are more likely to be used, good levels of sunlight are likely to be enjoyed. With careful design and the use of appropriate materials/planting it is considered that these amenity spaces can be pleasant place to use. Overall, it is

considered that the scheme delivers a very good level of sunlight amenity for the public and communal spaces.

Secured by design

425. The applicant met with officers of the Metropolitan Police, to review the design of the scheme and allow for appropriate security measures to be suitably incorporated into the development. The applicant has proposed that all shared spaces between the hotel and residential components, including back of house areas will be clearly signposted and monitored by CCTV.
426. The Metropolitan Police, in their consultation response to the application stated that the proposed development is on track to achieve Secured By Design accreditation. It is therefore appropriate to attach a 'Secured by Design' condition for the whole development.

Units per core

427. Standard 12 of the Mayor's Housing Design SPG requires that each core should be accessible to generally no more than eight units on each floor or less. The proposal has been designed to minimise corridor lengths. 63% of units are planned with less than 8 units per core.

Conclusion on quality of accommodation

428. To conclude, officers are satisfied that the quality of residential accommodation proposed would be high and would justify the high density of the scheme. The units would be provided with bulk storage which is a positive aspect of the design and the majority of the units would exceed the minimum requirement for floor sizes.

The percentage of dual aspect units across Phase 1 and 2 would be acceptable at 50%, with Phase 1 at 53%. Whilst there would be some single aspect flats, these units would benefit from easterly or westerly outlooks and returns to balconies and would provide very good quality accommodation overall.

429. The accommodation would achieve very good internal daylight levels including good privacy and outlook and a very good provision of outdoor amenity space and children's play space, as well as the other major regeneration benefits of the scheme. All flats would have private amenity space provided.

Density

430. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site is located within the Urban Density Zone, a density range of 200 to 700 habitable rooms per hectare would be sought. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.

431. The development as a whole would have a density of 2522 habitable rooms per hectare (hrh), calculated in accordance with the Residential Design Standards SPD 2011. This has been worked out on the basis of the total non residential floorspace of 11,788sqm GIA, 2119 residential habitable rooms and a site area of 1.01ha.

432. Since the maximum upper limit of 700 hrh would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then it's considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission. This is considered in the following table and paragraphs.

433.

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	Each apartment has been designed to provide at least the minimum built in storage required: 1 sqm for a Studio 1.5 sqm for a 1Bed 2 sqm for a 2Bed 2.5 sqm for a 3Bed
Exceed minimum privacy distances	<p>The layouts have been carefully organised to minimise overlooking and overshadowing between blocks.</p> <p>The 21m back to back distances have not been achieved. Nonetheless the layouts of the units have been arranged to avoid living rooms facing living rooms and to provide good outlook within the internal courtyard</p> <p>The elevational treatment further refines views to and from internal rooms providing privacy when facing neighbouring buildings and more openings to long views between buildings.</p> <p>In addition to this, adjustments to Block 1B massing have been made to increase the separation distance to block 1A. The internal partitions of Block 1C and 1D have been amended to provide dual aspect units towards the internal garden, leaving the smaller single aspect units with views towards the street.</p>
Good sunlight and daylight standards	<p>Daylight sunlight assessments have been undertaken to the proposed habitable rooms within Phase 1 of the Proposed Development. In addition, sun on ground studies have been undertaken to the proposed amenity spaces.</p> <p>The results show that a good level of compliance</p>

	<p>against the BRE guidelines Average Daylight Factor target criteria is expected. Approximately 88% of all habitable rooms will enjoy good levels of daylight for an urban area by receiving an Average Daylight Factor above that recommended by the BRE guidelines.</p> <p>The overshadowing results show that the proposed amenity spaces will enjoy slightly less sunlight than that suggested by the BRE guidelines as they will not quite receive 2 hours of sun on ground to over 50% of their area on 21 March. However, in the summer months, which is considered the time of the year when these amenity spaces are more likely to be used, good levels of sunlight are likely to be enjoyed</p>
Exceed minimum ceiling heights of 2.30 metres	The minimum floor to ceiling height across the development is 2.5m.
Exceed amenity space standards (both private and communal)	Overall both private and communal amenity spaces are met, as the small private amenity shortfall is reprovided as communal space.
Secure by Design certification	The proposals have been discussed in detail with Laura Flux (Designing Out Crime Officer) and Steve Watts (Metropolitan Police). The design team has addressed the comments received to comply with the secure by design criteria.
No more than 5% studio flats	Overall development proposes 18 (2%) of all units as Studio flats.
Maximise the potential of the site	<p>The potential of the site has been maximised by incorporating a mix of uses as well as public open spaces.</p> <ul style="list-style-type: none"> - 724 new homes of which 219 affordable (36% by habitable rooms) - 195 Hotel Rooms - 2,530 sqm of Retail Space - 1,141 sqm of Cinema - 4035 sqm of new public open space and Routes - 1,091 sqm of Residential and Playspace Area
Include a minimum of 10% of units that are suitable for wheelchair users	<p>The proposals respond to the policy requirements for inclusive design, ensuring that all housing will be appropriate, high-quality, well-designed and sustainable.</p> <p>90% of new housing meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and 10% of new housing meets Building Regulation requirement M4 (3) 'wheelchair user</p>

	<p>dwelling's,</p> <p>38 adaptable/wheelchair dwellings will be provided in Phase 1. 38 adaptable/wheelchair dwellings will be provided in Phase 2.</p>
Have excellent accessibility within buildings	<p>Step free access would be provided to the majority of the site including access to the retail and commercial units. The exception being the town houses on Rowcross Street; However these only comprise 7 out of the 724 homes proposed.</p>
Have exceptional environmental performance	<p>The submitted energy report concludes that the residential element of the proposed development will achieve a CO2 emission reduction of 37.22% over Part L1A 2013 (with 2016 amendments) of the Building Regulations and the non-residential element will achieve a CO2 emissions reduction of 29.35% with the following strategy applied:</p> <p>Improved building fabric specification to exceed that of the notional building</p> <p>Community heating scheme with high efficiency gas boilers and 123kWe/199kWth Combined Heat and Power (CHP) engine connected to the dwellings and hotel</p> <p>Air Source Heat Pumps (ASHPs) to the retail units for heating and cooling and to the hotel for cooling</p> <p>87kWp of Photovoltaic (PV) array</p>
Minimise noise nuisance between flats by stacking floors so that the bedrooms are above bedrooms, lounges above lounges	<p>The submitted plans for each of the floor levels containing residential units within all buildings show a layout where bedrooms are stacked on bedrooms; this is replicated with living areas on top of living areas.</p>
Make a positive contribution to local context, character and communities	<p>The scheme makes positive contribution by enhancing its context and providing services, jobs and homes for local and new residents.</p>
Include a predominance of dual aspect units	<p>The layouts of the proposals has been carefully organised to minimise overlooking and overshadowing between blocks.</p> <p>While the total number of dual aspect units would be 50%, Phase 1 of the scheme would be 53%.</p>
Have natural light and ventilation in all kitchens and bathrooms	<p>The layouts of all residential units are carefully planned to provide natural light and ventilation to the kitchens area. Many of the affordable units have separate kitchens. Where a separate kitchen is planned (within the affordable units) an openable window is provided. Bathrooms will be mechanically</p>

	ventilated.
At least 60% of units contain two or more bedrooms	429 of the 724 units proposed consist of two or more bedrooms. This amounts to 60% of the entire development. 61% of social rented units would contain two or more bedrooms. The social rented offer also has an overprovision of 3 bed units, 31% rather than 20%, and the balance is considered to be acceptable.
Significantly exceed the minimum floor space standards	All units meet minimum floorspace standards. The majority (54%) of the proposed units will exceed minimum floor space standards.
Minimise corridor lengths by having additional cores	The proposal has been designed to minimise corridor lengths. 63% of the units are planned with 8 Units per Core and 38% of the units are planned with less than 8 units per core. Maximum travel distances in Block 1A is 9 m Maximum travel distances in Block 1B is 12 m Maximum travel distances in Block 1C is 7 m Maximum travel distances in Block 1D is 9 m Maximum travel distances in Block 2A is 15 m Maximum travel distances in Block 2B is 13 m

Conclusion on density

434. For the reasons detailed in the above table, the quality of the accommodation can support the high density since it provides for bulk storage, mitigates satisfactorily where overlooking standards cannot be reached, achieves very good daylight standards and in the clear majority of instances the minimum floorspace standards would be exceeded. The scheme includes a predominance of dual aspect flats at 53% in Phase 1. In addition, they have a balcony, terrace or garden, and access to communal amenity space.

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

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

Impact of the proposed uses

436. The re-provision of retail uses, as well as new uses such as residential, cinema and

hotel would be compatible with the surrounding land uses which include residential, retail and other commercial uses. Opening hours for the retail, hotel would be secured by condition, and noise from machinery and plant can also be adequately dealt with by condition to ensure that no harm to surrounding residential amenity would occur. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, and accordingly are all found to be acceptable uses.

Overlooking to surrounding neighbours

- 437. 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.
- 438. The nearest existing residential properties are listed below with the approximate distance of separation from the proposed development:

Surrounding properties	Location	Approximate distance of separation
Dwellinghouses on Chaucer Drive	Northern side of Rolls Road	19m
Gloucester Court,	Eastern side of Rowcross Street	16m
Astley House	Eastern side of Rowcross Street	42m
Lackland House	Eastern side of Rowcross Street	20m
Wessex House	Eastern side of Rowcross Street	30m
361 Old Kent Road	Junction of Rowcross Street and Old Kent Road	11m



Daylight

439. A daylight and sunlight report has been submitted as part of the ES, based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
440. The report considers 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 their original value before the loss is noticeable.
441. The report also considers the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.
442. The submitted report has taken into account the daylight and sunlight impacts for surrounding residential buildings which are in residential use. Whilst there are other residential properties located near the site, the report advises that these have not been included in the assessment as the effects are considered to be small.

443. 18-58 Chaucer Drive
 60-82 Chaucer Drive
 84-114 Chaucer Drive
 116-146 Chaucer Drive
 148-178 Chaucer Drive
 160 Oxley Close
 156 Oxley Close
 154 Oxley Close
 130-152 Oxley Close
 128 Oxley Close
 1-13 Gloucester Court, Rolls Road
 1-14 Lackland House
 1-90 Astley House
 356 Old Kent Road
 354 Old Kent Road
 352 Old Kent Road
 320-322 Old Kent Road (PH) and
 361-363 Old Kent Road

444. Image: Site plan showing the properties surrounding the site.



445. The overall effects of the proposed development have generally been described as negligible, minor, moderate or major using professional judgement, and by reference to the following table which can be found in the ES.

Table: Daylight, sunlight and sun on ground significance criteria

446.	Significance	Description
	Negligible	No alteration or a small alteration from the existing scenario which is within the numerical levels suggested in the BRE Guidelines.
	Minor Adverse	Minor infringements (20.1% - 30% reductions) of the numerical values suggested in the BRE Guidelines, which should be viewed in context. OR Daylight: Retaining at least 15% VSC and 50% NSL Sunlight: Retaining a total APSH of at least 15% APSH
	Moderate Adverse	Moderate infringements (30.1% - 40%) of the numerical values suggested in the BRE Guidelines, which should be viewed in context. OR Daylight: Retaining at least 10% VSC and 30% NSL Sunlight: Retaining a total APSH of at least 10% APSH
	Major Adverse	Major infringements (40.1%+) of the numerical values suggested within the BRE Guidelines, which should be viewed in context. OR Daylight: Retaining less than 10% VSC and less than 30% NSL Sunlight: Retaining a total APSH of less than 10% APSH

Daylight to surrounding properties

447. There are 541 windows serving 422 residential rooms within the assessed properties surrounding the site. These have all been assessed in terms of both VSC and NSL.

Table: VSC summary with the proposed development in place.

448.	Address	Total no. windows that meet the BRE guide (Neg.)	Below BRE guidelines			Total	Total no. of windows
			20.1-30% reduction (minor)	30.1-40% reduction (moderate)	>40% reduction (major)		
	18-58 Chaucer Drive	39	6	0	0	6	45
	60-82 Chaucer Drive	5	3	9	3	15	20
	84-114 Chaucer Drive	16	0	0	24	24	40
	116-146	4	4	0	24	28	32

Chaucer Drive						
148-178 Chaucer Drive	8	0	4	20	24	32
160 Oxley Close	4	0	0	0	0	4
156 Oxley Close	6	1	0	0	1	7
154 Oxley Close	6	2	0	0	2	8
130-152 Oxley Close	22	1	0	0	1	23
128 Oxley Close	14	0	0	0	0	14
1-13 Gloucester Court	10	4	4	17	25	35
1-14 Lackland House	0	0	0	28	28	28
1-90 Astley House	37	19	37	111	167	204
356 Old Kent Road	4	0	0	0	0	4
354 Old Kent Road	6	0	0	0	0	6
352 Old Kent Road	6	0	0	0	0	6
320-322 Old Kent Road	(PH)	19	0	0	0	19
361-363 Old Kent Road	2	0	2	10	12	14
Totals	208	40	57	236	333	541

Table: NSL Summary with the proposed development in place

449.

Address	Total no. of rooms that meet the BRE	Below BRE guidelines	Total no. of rooms
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	guide (Neg.)	20.1-30% reduction (minor)	30.1-40% reduction (moderate)	>40% reduction (major)	Total	
18-58 Chaucer Drive	36	0	0	0	0	36
60-82 Chaucer Drive	6	6	1	1	8	14
84-114 Chaucer Drive	19	11	2	0	13	32
116-146 Chaucer Drive	12	4	5	11	20	32
148-178 Chaucer Drive	12	6	2	4	12	24
160 Oxley Close	2	0	0	0	0	2
156 Oxley Close	3	0	0	0	0	3
154 Oxley Close	3	0	0	0	0	3
130-152 Oxley Close	14	0	0	0	0	14
128 Oxley Close	6	0	0	0	0	6
1-13 Gloucest er Court	10	0	0	5	5	15
1-14 Lackland House	0	1	2	25	28	28
1-90 Astley House	148	12	14	12	38	186
356 Old Kent Road	2	0	0	0	0	2
354 Old Kent Road	6	0	0	0	0	6
352 Old Kent Road	6	0	0	0	0	6

320-322 Old Kent Road	7	0	0	0	0	7
361-363 Old Kent Road	2	1	1	2	4	6
Totals	294	41	27	60	128	422

450. The above results show that based on the VSC reductions alone, the majority of windows would experience a moderate or major adverse effect. This however is to be expected due to the fact that the existing buildings on the site are low-rise buildings. The reductions and impacts are therefore likely to be notable to the occupiers of the surrounding properties.

Complaint VSC and NSL properties

451. In situations where the proposed development would result in fully BRE compliant VSC and NSL alterations to the windows and rooms within a property, the effect on the daylight amenity to that property is considered in the submitted ES to be of negligible significance. The following properties would therefore experience alterations which, in accordance with the BRE Guidelines, would not be noticeable to the occupants and therefore considered negligible:

452. 160 Oxley Close
128 Oxley Close
356 Old Kent Road
354 Old Kent Road
352 Old Kent Road
320-322 Old Kent Road

Minor adverse VSC and NSL properties

453. The applicant has considered that the effect of daylight amenity of a property in an urban context can be considered minor adverse in situations where:

454. i) Despite VSC alterations to the windows serving the room, the NSL alteration to the room is fully compliant with the BRE Guidelines; or
ii) Despite NSL alterations to the room, the VSC alteration to all windows serving the room is fully compliant with the BRE Guidelines; or
iii) All VSC and NSL alterations applicable to the room are no greater than 30% of their baseline values.

455. Accordingly, the effect on the daylight amenity within the following properties has been therefore defined as minor adverse:

456. 18-58 Chaucer Drive
156 Oxley Drive
154 Oxley Close
130-152 Oxley Drive

Moderate and major adverse VSC and NSL properties

457. Properties which would experience moderate or major adverse impacts are considered

in more detail below.

60-82 Chaucer Drive

458. There are assumed to be 20 windows serving 14 rooms within this property that face towards the proposed development. It has been assumed that all windows serve a habitable room apart from those that are obvious to serve a stairwell or communal area.
459. Of the 20 windows assessed, 3 windows which serve 3 rooms would experience alterations which are within 20% of the BRE reduction criteria for both VSC and NSL assessments and are therefore considered to be of negligible significance. All other windows/rooms are therefore likely to experience an adverse/notable effect in accordance with the BRE Guidelines and are considered in further detail below.
460. The impact to room R3/41 (on first floor) is considered to be of minor adverse significance due to the VSC alteration to the window being compliant with the BRE Guidelines, despite the NSL alterations to the room.
461. For the remaining 10 rooms, 9 have a main window which retains at least 15% VSC and retains a No-Sky Line (NSL) to at least 50% of the rooms area. The retained level of daylight is considered appropriate for an urban setting.
462. The room use of the remaining room (R3/42 on the second floor) has been assumed to be habitable. The window to the room (W3/42) has a VSC of 11% because it has a projecting wing which limits the amount of light the window receives. However, if the self-obstruction element of this building was not present, the applicant advises this window would retain a higher VSC of at least 15%.
463. The overall daylight effect on this building is therefore concluded to be of minor adverse significance.

84-114 Chaucer Drive

464. There are 40 windows serving 32 rooms in this property that face towards the proposed development.
465. Of the 40 windows, 8 windows which serve 8 rooms would experience alterations which are within 20% of the BRE reduction criteria for both VSC and NSL assessments and are therefore considered to be of negligible significance. All other windows/rooms are therefore likely to experience an adverse/notable effect in accordance with the BRE Guidelines and are considered in further detail below.
466. Of the remaining 24 rooms, 16 rooms have a main window which retain at least 15% VSC and retain a No-Sky Line (NSL) to at least 50% of the rooms area.
467. This therefore leaves 8 rooms, which are all located in the corners of the property with a projecting wing to the right-hand or left-hand side of them. The window directly to the left/right of each of these windows, which is also closer to the proposed development, each retain a VSC above 15%. It is therefore clear that it is the presence of the projecting wings as to why these windows do not achieve a higher VSC. Following the principles set out in the BRE Guidelines regarding self-obstructions the effect can therefore be considered minor adverse.

468. Further to the above, the overall daylight effect on this building is concluded to be of minor adverse significance.

116-146 Chaucer Drive

469. There are 32 windows serving 32 assumed rooms in this property.

470. Of the 32 windows/rooms assessed, 4 would experience VSC and NSL alterations which are within the BRE Guidelines suggested criteria. The effect on these rooms is therefore considered to be of negligible significance. All other windows/rooms are therefore likely to experience an adverse/notable effect in accordance with the BRE Guidelines and have been considered in further detail below.

471. Of the 28 rooms experiencing an adverse effect, 4 would retain over 15% VSC and more than 50% daylight distribution.

472. The remaining 24 rooms, when taking into account the recessed windows/projecting wings, generally retain a VSC of around 13%.

473. In addition, the daylight distribution to the majority of rooms is above 50%, and where it would fall below 50%, this is due to the projecting wings.

474. Overall the effect on this property is considered to be of moderate adverse significance.

148-178 Chaucer Drive

475. There are 32 windows serving 24 rooms in this property that face towards the proposed development.

476. Of the 32 windows, 8 windows which serve 8 rooms would experience alterations which are within 20% of the BRE reduction criteria for both VSC and NSL assessments. The effect on these rooms is therefore considered to be of negligible significance.

477. This leaves 16 rooms of which, 14 rooms have a main window which retain at least 15% VSC and retain a No-Sky Line (NSL) to at least 50% of the rooms area and are therefore considered to be of minor adverse significance.

478. The remaining two rooms are located on the ground floor (R9/70 & R10/70) are served by windows W10/70 and W11/70. These are located to the right of a projecting wing. This projecting wing is self-obstructing the daylight to this room and it is clear that if the effect of the projecting wing is removed that this window would retain a VSC above 15%. In addition, the retained NSL is greater than 50% of the room area.

479. Overall, when considering the retained values of daylight, the impacts to this property are considered to be of minor adverse significance.

1-13 Gloucester Court, Rolls Road

480. There are 35 windows serving 15 rooms to this property.

481. Of the 15 rooms assessed, all would experience a reduction in VSC to at least one window that is beyond 20% of its existing value. It is therefore considered that all rooms would experience an adverse effect when considered against the BRE Guidelines. It is understood there would be 8 flats affected.
482. One of the reasons why the reductions in daylight are beyond the BRE Guidelines is because the windows are nearly all set back from the main elevation behind a balcony space. Re-running the calculations to remove the effect of the balcony shows that the retained levels of daylight are at least 13.45%. In addition, the daylight distribution results show that each room, with the balconies in place, would retain at least 50% NSL.
483. Overall, when considering the retained VSC levels in combination with the NSL values, the impact is considered minor adverse.

1-14 Lackland House

484. There are 28 windows serving 28 rooms in this property. The properties affected are understood to be 2-bed maisonettes with a small kitchen and secondary bedrooms facing towards the proposed development.
485. The living rooms all face in the opposite direction to the proposed development and would therefore not be affected. It is understood that there are 14 flats with windows that face towards the proposed development.
486. Of the 28 rooms assessed, all would experience a reduction in VSC that is beyond 20% of its existing value. It is therefore considered that all rooms would experience an adverse effect when considered against the BRE Guidelines.
487. One of the reasons why the reductions in daylight are beyond the BRE Guidelines is because the existing buildings on the site are low rise and the windows are nearly all beneath a walkway balcony.
488. When removing the effect of the balconies, the ground floor kitchens retain an average VSC of around 13% and the first-floor bedrooms retain a VSC of around 14.50%.
489. The NSL results show that the rooms would experience a NSL slightly below 50%, and when taking into account the room sizes and uses (bedrooms and small kitchens), the significance of the effect is reduced.
490. The effect to this property is therefore considered to be of minor adverse significance.

1-90 Astley House

491. There are 204 windows serving 186 rooms in this property.
492. The living rooms all face in the opposite direction to the proposed development and would therefore not be affected.
493. Of the 204 windows assessed, 37 windows which serve 20 rooms would experience alterations which are within 20% of the BRE reduction criteria for both VSC and NSL assessments and are therefore considered to be of negligible significance.

494. It is therefore considered that the majority of rooms would experience an adverse effect when assessed against the BRE Guidelines criteria.
495. One of the reasons why the reductions in daylight are beyond the BRE guidelines is because the existing buildings on the site are low-rise and the windows are nearly all affected by the walkway balconies.
496. When removing the effect of the balconies, the windows would retain a VSC of at least 17%. The daylight distribution tests also show that each room would retain a daylight distribution to more than 50% of the room's area. Therefore the submitted report states that the projecting walkways do cause a relative loss of light to the rooms and, if these were not to be present then, the retained values are in line with what is considered commensurate for the local area.
497. The overall significance when considering the retained values of daylight is considered to be of minor adverse significance.

361-363 Old Kent Road

498. This property is in retail use on the ground floor and the applicant has assumed residential on the upper floors with 14 windows serve 6 site-facing residential rooms.
499. Of the 6 rooms assessed, all have at least one window that would experience a VSC reduction that is beyond the BRE Guidelines criteria. All rooms would therefore experience an adverse effect when assessed against the BRE Guidelines criteria.
500. On review of the retained values, 5 rooms would have a main window, retain at least 15% VSC and/or at least 50% of the room area can still benefit from direct skylight at working plane height (NSL) with the proposed development in place. These rooms are therefore considered to be of minor adverse significance.
501. The remaining room is located on the first floor of the property and would have a retained VSC of 14%. Additionally, the room retains a No-Sky Line to 71% of the room's area, which is only 9% below the recommended value as suggested by the BRE Guidelines. It is therefore considered that the overall effects to this room would be of minor-moderate adverse significance.

Conclusion on daylight

502. The results of the daylight assessment do reveal that there would be a number of rooms that would not meet the relevant daylighting standards of the BRE, with properties at 60-82 Chaucer Drive, 84-114 Chaucer Drive, 116-146 Chaucer Drive, 148-178 Chaucer Drive, 1-13 Gloucester Court, 1-14 Lackland House, 1-90 Astley House and 361-363 Old Kent Road affected.
503. In these instances it is recognised that there would be a degree of harm to the daylight amenity of residents, but this harm is considered on balance to be acceptable in this urban location and when taking into account features such as projecting walkways and balconies which are limiting the amount of light received by the windows. Given the context of the site, these results are indicative of a relatively good retained level of daylight.
504. Considering the daylight impacts overall, the harm that would be caused to some

361-363 Old Kent Road	2	0	0	0	0	0	0	0	0	2
Total	132	0	0	12	12	1	1	9	11	144

Sunlight compliant properties

508. The following properties have a number of site-facing rooms that are within 90 degrees of due south and would experience alterations which, in accordance with the BRE Guidelines, would not be noticeable to the occupants:

509. 18-58 Chaucer Drive
60-82 Chaucer Drive
148-178 Chaucer Drive
160 Oxley Close
130-152 Oxley Close
128 Oxley Close
320-322 Old Kent Road (PH)
361-363 Old Kent Road

510. Two remaining properties at 84-114 Chaucer Drive and 116-146 Chaucer Drive would experience APSH alterations that are beyond those described above and so are considered in more detail in the following paragraphs.

84-114 Chaucer Drive

511. 28 rooms have one or more site-facing windows which require assessment. Of these rooms, 21 are within the BRE Guideline recommendations in terms of any alteration to their APSH levels. This means that the occupants of these rooms are unlikely to notice any alteration to their levels of sunlight amenity. The effect on these rooms is therefore considered negligible.

512. The remaining 7 rooms would experience alterations to their level of annual sunlight that is beyond the BRE Guidelines.

513. Of the 7 windows that do not meet the BRE Guidelines, 6 would retain a good level of total APSH with 25% or above. These windows therefore only fail to meet the recommended guidance for the winter months sunlight hours. However, the lowest retained winter months value to these 5 windows is 3%, which is considered acceptable for an urban area.

514. The remaining window retains an APSH of 20% of which 1% will be in the winter months. This window is on the side elevation of the property and orientated almost 90 degrees to the proposed development. In addition, it is assumed, given the position of the window that it is likely to serve a bedroom, which the BRE guidelines say is considered less important than a main habitable room.

515. Overall, when taking into account the retained levels of sunlight and the fact that the majority of windows would experience a negligible effect, it is considered the effects upon this building can be considered of minor adverse significance.

116-146 Chaucer Drive

516. 24 rooms have one or more site-facing windows, which are required for sunlight assessment. Of these rooms, 19 are BRE compliant in terms of any alteration to their APSH levels. This means that the occupants of these rooms are unlikely to notice any alteration to their levels of sunlight amenity. The effect on these rooms is therefore negligible.
517. The 5 windows that do not meet the BRE Guidelines are those that are set back from the main elevation with a projecting section of the building on one or both sides. It is clear from the results to the unobstructed windows, which are also positioned further forward towards the proposed development, that these windows would enjoy good levels of sunlight above the BRE Guidelines recommendations if the projections were not in place. When applying the good neighbourly principles, it can therefore be considered that it is due to the presence of the projection elements of this building, rather than the scale and bulk of the proposed massing as to why these windows do not retain good levels of sunlight in accordance with the BRE Guidelines.
518. Overall, when taking into account the projecting elements of the building, it is considered that the effects upon this building can be considered to be of minor adverse significance.

Conclusion on sunlight

519. As with daylight, there are a number of windows which would not meet the BRE guidelines for summer and winter sunlight. However, the extent of non compliance is considered minor overall with just two properties adversely affected and when taking into account overhanging balconies and projections, the impacts are on balance found to be acceptable.

Overshadowing to surrounding amenity areas

520. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least 50% of the area should receive at least two hours of sunlight on 21st March.
521. There are no public amenity spaces, which are relevant for detailed sun on ground overshadowing assessment to the north of the proposed development.

Transient overshadowing

522. Transient overshadowing analysis has been run to show the instances and duration of any additional shadow caused by the proposed development to the surrounding amenity spaces.
523. It can be seen that there would be a slight increase in transient overshadowing to the amenity spaces surrounding the proposed development, as would be expected from a development of this scale. However, this shadow does not cover large areas for prolonged periods of time and is therefore, considered to represent a negligible impact.
524. When looking at the transient results in more detail, the children's play space behind Lackland House would experience approximately 1 hour of slight additional overshadowing, when the sun is low in the sky between 4pm and 5pm on 21st March. It is clear from the sunlight this space can receive throughout the day that a negligible

impact would be shown if detailed 2 hours sun on ground assessments were carried out. Additionally, in the summer months, the transient overshadowing images show that a slight amount of overshadowing would be experienced between 6pm and 7pm. This again is considered a negligible impact.

525. The 21st June analysis plots show that Burgess Park would experience a slight amount of additional overshadowing between 6am and 7am. This is considered a negligible effect.
526. Overall, the effect of the proposed development in terms of overshadowing to the public and private amenity spaces throughout the year is considered to be negligible.

Cumulative impact (mosque)

527. There is currently only one cumulative scheme which is in close proximity to the Site to be considered for assessment and this is the Muslim Association for Nigeria scheme to the south east of the site.
528. When taking into account the impacts of the mosque, which would increase in height from 4 storeys to 5 storeys following its redevelopment, the impacts are considered to be of minor adverse significance.

Transport Issues

Key transport issues

529. In assessing this application from a transport perspective, the council is required to pay significant consideration to development proposals which are on or adjacent to the route alignment of the proposed Bakerloo Line Extension. Safeguarding of the route alignment and land for Bakerloo Line Extension stations and enabling works is a policy commitment contained in the New Southwark Plan. This proposed development is adjacent to the proposed Old Kent Road 1 station and directly above the route alignment for the Bakerloo Line Extension. Therefore, special consideration will be required to be undertaken to ensure that by permitting development, successful delivery of the proposed Bakerloo Line Extension will not be compromised which is integral for the success of the Old Kent Road corridor regeneration scheme.

Key issue 1: The BLE and the Hotel

530. Officers agree with TfL that if the hotel was approved to be delivered within the same time frame as the rest of phase 1 it could compromise the delivery of the BLE station and tunnelling.
531. We did consider the moving of the hotel to phase 2. The applicant's preference was to retain the hotel in phase 1 because phase 2 could be up to 10 years away.
532. Discussions with TfL and LBS are ongoing with the neighbouring site where Tesco's is currently located. Successful discussions could lead to the station box being delivered as part of the re-development of this site which could have economic benefits to the delivery of the BLE.
533. Recent correspondence with TfL proposed a possible compromise which was to use an S106 obligation to ensure the basement and piling for the hotel require a formal sign off from TfL before construction can be delivered.

534. Officers believe that this is a reasonable compromise as TfL's current programme for the BLE is for submission of application for a Transport Works Act Order (TWAO) in 2022 to be decided 2023. To meet that requirement TfL should have sufficiently advanced the design of the tunnels and stations to be able to assess applications details.

Key issue 2: TfL's concerns on the Traffic management

535. Officers agree with TfL that careful consideration of the implications of the development on the public highway and the potential changes required to facilitate the BLE.

536. However the current arrangements where the site is accessed from Humphrey Street via a large ground level car park is largely retained until phase 2.

537. Phase 1 proposals provide access from Rolls Road for the rear of the site which will require some changes to the local road network to facilitate but are considered reasonable by Southwark highways and deliverable within the S278 agreement. The impact on Rowcross Street will be minimised by ensuring the servicing courtyard exits left only. The use of Rowcross Street to access the hotel has been discounted by Southwark as an option on road safety grounds.

538. The servicing of the hotel when it is approved to be delivered will happen from the retained ground level car park until Phase 2 basement extension is delivered. An obligation for that extension to the basement to be an essential part of phase 2 has been agreed with the applicant.

539. The extent of the S278 for phase 2 includes the opportunity to revisit changes made in phase 1 to ensure amendments can be made.

Policy context

540. Saved Policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 requires the needs of pedestrians and cyclists to be considered and 5.6 establishes maximum parking standards.

541. Southwark have recently adopted the Movement Plan, a people, place and experience approach to transport planning. This application has been assessed on how will contribute to the 9 Missions.

542. The Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application, namely:

Vision Zero
Healthy Streets
Air Quality

The submitted Transport Assessment (TA) complied with TfL guidance and is considered to provide a comprehensive appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips

resulting from the

543. The site records a Public Transport Access Level (PTAL) of 4. There are numerous bus stops within 300 metres of the site that serve bus routes to and from central London and with connections to stations including Bakerloo and Northern Line and national rail services at Elephant and Castle and Northern, Jubilee and national rail services at London Bridge.

Existing site layout

544. The site is served by a single two-way vehicle access from B204 Humphrey Street to the retail car park.
545. There is a dedicated pedestrian access connecting the retail park to the A2 Old Kent Road/B204 Humphrey Street junction to the south-west of the site. At the northern part of the site a pedestrian access is provided close to the northern retail block that connects to B204 Humphrey Street.
546. The existing retail units of Argos and Sports Direct have rear servicing accessed from Humphrey Street via the car park locations. Carpet Right and DFS are serviced from the car park.
547. Currently there is no access from the rear of the site on Rolls Road which operates one way exiting onto the Humphrey Street mini roundabout. A speed table forms the T-junction between Rolls Road and Rowcross Road at the north-eastern corner of the site, Rolls Road was made one –way to address rat running in the past Rowcross Street forms the eastern boundary of the site, linking Rolls Road with Old Kent Road. It is a two-way single carriageway road subject to a 20 miles per hour speed limit starting 25 metres (approximately) from its junction with Old Kent Road. There are traffic calming measures in the form of speed humps along Rowcross Street.

Future site layout

548. Key to understanding how the site layout will work after the two Phases are delivered is the role of Humphrey Street. During the construction of the BLE 1 station at this location Humphrey Street is likely to be closed for an estimated 6 years. Post BLE station it is likely that Humphrey Street will reopen but how it operates is currently unknown. Therefore both the Phases have concentrated the access to the site to the rear on Rolls Road.
549. To accommodate the proposed access requirements from Rolls Road, Southwark's highways are looking at changes to the traffic management in the area and will be detailed up as part of the S278 agreement.
550. The likely change is to make the first section of Rolls Road two-way working from the mini roundabout to the speed table at the junction with Rolls Road. The whole of that section of the public highway will require a re-design to ensure pedestrian and cycle safety is prioritised.
551. Officers are keen to reduce the impact of Rowcross Street. Therefore it is proposed that the servicing area at the rear of the site can exit left only onto Rowcross Street.
552. The basement car park area can accommodate up to a 7m rigid vehicles to service

and deliver this has space for two way movement to happen allowing for one vehicle to queue each way off the public highway.

- 553. Larger vehicles including refuse collection vehicle will use the ground floor forecourt area which will operate one-way from Rolls Road to Rowcross Street where vehicles will exit left only.
- 554. To clarify the TA proposed using Rowcross Street to exit back onto Old Kent Road. This was discounted by both Southwark highways and TfL.
- 555. All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance.
- 556. Condition requirement for the detailed design of the Ground floor forecourt and its relationship with the public highway including the gates. To ensure secure by design and road safety is fully considered.
- 557. Phase 2 extent of S278 works will include the Phase 1 extent to ensure the opportunity to ensure a cohesive finish to the area.
- 558. Phase 2 will also require TfL S278 the interim extent of which is included in the heads of terms.

Trip Generation

- 559. Once fully built and occupied, the vehicular trip generation from the site is estimated to be as shown in the table below.

Land Use	Daily Demand (vehicles)	Peak Hour (0900-1000)
A1 Retail (Food/Nonfood)- Ground Floor	7	1
A2-5 Retail (Café)- Ground Floor	18	3
C3 Residential	44	7
C1 Hotel	9	1
Cinema/ Leisure use	1	0
TOTAL - ALL	80	12
A1 Retail (Food/Nonfood) - Ground Floor	7	1
A2-5 Retail (Café)- Ground Floor	5	1
C3 Residential	33	5

TOTAL – Phase One	46	
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560. The nature of this hybrid application means that the Phase 2 will have to come back to committee with detailed design and the up to date review of impacts on transport and the public highway. This allows for adjustments to changes made in the first Phase to be incorporated at that time.

Walking

561. As part of the TA a Pedestrian Environment Review System (PERS) Audit was carried out in August 2018. This information demonstrated the proposal would improve the pedestrian experience as routes audited were considered to be pedestrian friendly and benefited from good pedestrian infrastructure.

562. The proposal creates a “destination space” allowing pedestrian movement from the Old Kent Road and the proposed new BLE station to move through the site and allows for a generous space protected from the Old Kent Road by the hotel.

563. It is recommended that to support Healthy Streets the extended areas of footway is secured as public highway in the Section 106 agreement to ensure it is capable of delivery of safe and comfortable pedestrian movement and operation of the bus stops on Humphrey Street whilst retained and to take account of the scheme.

564. The S278 works will ensure pedestrian safety is prioritised in all changes to the public highway in both Phases

Cycling

565. The TA includes Cycle Level of Service (CLOS) Audit which was carried out in parallel with the PERS Audit.

566. A total of 893 cycle parking spaces would be provided across the scheme. This is less than the current London Plan standards however the application also provides other cycle benefits This would be split across the uses as follows:

Land Use	Long Term	Short Term (public realm)
Retail	10 spaces	79 spaces
Hotel	10 spaces	21 spaces
Residential	725 spaces	44 spaces
Cinema	2 spaces	2 spaces
TOTAL	747 spaces	146 spaces

567. The bicycle is going to be of critical importance in the movement of people throughout central London therefore the provision of cycle parking and other cycle enabling opportunities is a significant part of the pre-application negotiations in the OKR AAP

area. A balance is sort between the London plan cycle parking standards, quality of infrastructure and other cycle opportunities. In this applications cycle parking would be provided through a mix of double stackers, Sheffield stands to the equivalent to 1 space per residential unit design to be agreed by condition. There will also be:

568. Brompton style cycle hire lockers equivalent to 1 locker per 10% of residential units (10% of which a EV lockers)
Brompton style cycle hire lockers equivalent to 1 locker per 10% of proposed jobs (10% of which a EV lockers)
Visitor cycle parking compliant with London Plan but locations to be agreed by condition and where on the public highway as part of the S278 agreements.
Sustainable transport lockers to accommodate tricycles, scooters, prams, possible cargo bikes.
569. TfL intend to provide docking stations for the Santander (TfL managed docked cycle scheme) cycle hire within the proposed BLE station one, therefore given the proximity of the site to the proposed station additional station/s are not considered necessary.
570. However there is nothing within the application which would preclude the provision of a docking station in the public highway adjacent the site.

Behaviour Change

571. A travel plan should be secured for the proposed cinema and hotel, to ensure that staff and customer trips are sustainable. This will be requested by condition.

Public transport

Buses

572. The site has convenient access to accessible public bus services. Main bus routes connecting to New Cross, Elephant and Castle, London Bridge, Waterloo, Liverpool Street and Kings Cross run along Old Kent Road with stops adjacent to the site.
573. Bus services will need to be increased in the area ahead of the BLE to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area in advance of the opening of the planned BLE which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. As per the Ruby Triangle site an agreed maximum cap for bus contributions is proposed of £2,700 per unit. This will be able to be requested in stages between 3 -5 years. At each stage TfL will need to provide evidence to justify the requested payments in terms of what services they are enhancing and how they are mitigating scheme impacts.

Bakerloo Line extension

Running Tunnels

574. As detailed above, the current proposals for the Bakerloo Line Extension involve running two tunnels directly below the southern end of the application site. Although the principle and location of the proposed hotel and basement development is supported, the implementation of the hotel as part of Phase 1 and the cinema and basement as part of Phase 2 could negatively impact the delivery of the Bakerloo Line Extension tunnels. The applicant and their engineers and LBS officers have and a

series of meetings with TfL over the last year to try and resolve this issue.

575. As the GLA note in their Stage 1 report and TfL's email dated 29 April 2019, a final decision has not been made on the siting of the proposed underground station box and escapes, the running tunnel sitings and the potential requirements for a station worksite. Furthermore, the impact of the proposed scheme's foundations on the running tunnels is currently being assessed by TfL, however TfL advise that they cannot accept these proposals as they stand as they provide inadequate safeguarding to the delivery of the BLE.
576. TfL advise that:
577. The running tunnels could be impacted by both Phases of development by means of possible encroachment into the running tunnel exclusion zone.
Were a permission to be granted for the Phase 2 element of the development, conditions are required to ensure that the applicant is obliged to ensure designs enable the Phase 2 structure to avoid the exclusion zone and to safeguard the delivery of BLE. This would require further design work to ensure that basement spans over the tunnels and to demonstrate that the tunnels are not excessively loaded / unloaded given the life of the development will be shorter than the tunnels built for the BLE. Given this is of fundamental importance to the acceptability of the phase 2 development it is their view that this work must be carried out prior to determination of the permission lest a condition is imposed with which compliance is impossible or very costly and complex or requires other changes to the approved design e.g. levels
They are considering raising the alignment (depth below ground) of the running tunnel, therefore further work is required to understand how the development, and in particular the hotel and the basement cinema and parking and servicing area, would accommodate a revised vertical alignment.
Phase 2 structure design needs further work in terms of addressing potential settlement and vibration mitigation to the cinema.
The applicant reviews their drawings in respect of lift requirements and other details before a decision on the current application to confirm that the development once designed up to full detail can be implemented as currently proposed without encroachment into the exclusion zone
578. In light of this, and to ensure that there are no temporary or permanent structures in the running tunnel exclusion zone in the Phase 1 and 2 of development and to address the other concerns set out above, TfL request that a s106 obligation placing a legal requirement on the applicant for appropriate safeguarding must be agreed with TfL. TfL consider a s106 obligation is justified in this location due to the proximity of the site to the proposed station.
579. Furthermore TfL request they are a party to the legal agreement to enable it to be fully involved in the consideration of the technical details and can enforce if necessary itself.
580. Given the proximity of the development both horizontally and vertically to the BLE early works which could take place prior to fulfilment of the obligation, it should be defined as demolition and site clearance only in respect of the Phase 2 site and that part of the Phase 1 on which the hotel would be developed.
581. TfL advise that have no concerns if the early works for the rest of Phase 1 included additional elements such as the laying and / or diversion of infrastructure and services;

access works on or adjacent to the public highway (subject to any necessary agreements pursuant to s184 or s278 or equivalent).

Bakerloo Line Extension Station – Old Kent Road 1

582. TfL has discussed with the applicant the proposal for a Bakerloo line station on the site of the Tesco superstore, as consulted by TfL in 2017. At the current time, this station location remains TfL's preferred option. However, it was noted by TfL to the applicant that there are alternative proposals including within the Tesco site and potentially including the Southernwood retail park site, as proposed by Invesco and Tesco. TfL are obliged to demonstrate consideration of these latter proposals.
583. TfL has also discussed with the applicant the potential need for TfL to temporarily close Humphrey Street for the duration of works on the station and this section of the line. This could be for a period of 5 or more years and thus it would be necessary to ensure that the development can at both phases and also during construction of Phase 2 operate safely and effectively in terms of access.
584. TfL's concern relates particularly to vehicles serving the hotel and during the construction of Phase 2 and its subsequent occupation, all of which could take place prior to completion of the BLE works. In addition, TfL cannot rule out the need for further land to support construction and operation of the station. TfL would consider this further as part of its ongoing work towards their objective to develop a scheme which could secure Transport and Works Act (1992) Order consent. This will therefore require TfL to take no more land but also no less than is required to ensure that its infrastructure can be built and operated safely and efficiently.
585. TfL notes that the applicant's proposals potential to place constraints on where the running tunnels can be constructed through foundation and other structure -free areas of the development. Owing to the proximity of the applicant's site to the proposed Bakerloo line extension station location, the applicant's proposal will potentially reduce optioneering for the station siting and its design as the tunnels' location could be dictated by the applicant's scheme (assuming planning permission is granted and related details approved). Whilst TfL consider it should still be possible to build the OKR 1 station, it is likely to add to the risk and complexities that may impact on cost of construction of the BLE.
586. In summary, and in light of TfL concerns it is considered reasonable to ensure the detailed designs of the basement of the proposed hotel, the basement cinema and the service basement to Blocks 2A and 2B safeguard the delivery of the running tunnels, alongside appropriate conditions.
587. TfL should therefore be a cosignatory to the s106 in respect of the foundation design, and that phase 2 of the development and the hotel element of the development can not be implemented until the foundation design is agreed by TfL and LBS.
588. TfL have recommended that a condition be imposed to ensure TfL's approval of the foundation design, and a condition to this effect has been included on the draft decision notice.

Car parking

589. The existing site has 146 parking spaces (11 accessible spaces and 135 standard

spaces).

590. The development is largely car free but would provide 71 accessible parking spaces within the basement area for the full development (38 spaces for Phase one). The majority of the spaces (52 of the 55 spaces) would be located within the proposed basement. The proposed retail and residential car parking within the basement will be separated.
591. The retail provision in Phase 1 will use the car parking within the Phase 2 retail area until the full basement is delivered.
592. Car club membership will be provided for residents, which can be secured by the legal agreement.
593. A condition would also ensure that no future residents or occupiers of the proposed development could obtain resident parking permits for any future CPZ.
594. It is also felt appropriate to attach a condition to the draft decision notice asking for the submission of marketing materials for sale and rental properties clearly identifying the development as car free and that all new residents should sign acknowledgement of the permit free status of their new home.

Servicing and Delivery

595. The TA predicts servicing demands for the Southernwood Retail Park scheme. Phase 1 identifies motorised vehicle servicing of 54 two movements per day. The development proposals for Phase one/two will introduce approximately 80 inbound and 80 outbound servicing trips per day. (An agreement to move the hotel to Phase 2 will reduce the Phase 1 trips by 9 two way movements).
596. The proposed scheme seeks to introduce two dedicated service bays. The spaces offer access for general deliveries within the site boundary throughout the day for HGVs/panel vans/LGVs/small vans and refuse collection vehicles. The loading bays within the basement will be provided with a minimum clear headroom of 3.8m – 4.0m to accommodate all typical delivery vans up to 7m long. The supermarket home delivery vehicles (e.g. Ocado) require more headroom than the typical 7m long delivery vehicles will be accommodated in the basement. The areas where the refuse collection vehicle will operate (bin collections) at ground level, will be provided with a minimum 4.5m clear head room where these vehicles will operate.
597. The waste operations will be managed by the on-site facilities management team and refuse will be collected by an appointed contractor or LBS (residential waste).
598. The domestic waste collection identifies up to 90 bins to be collected from a single point. Consideration of how much time that will take needs to be taken into account in the DSP. The holding area can only hold 45 bins. Officers estimate that 45 bins could take in excess of one hour to process. If two refuse vehicles are needed to carry out this it will prevent other vehicles using this facility during that time. To empty 90 bins will double the impact. The DSP bond obligation will need to include details on how this will be managed to not impact negatively on to the public highway before occupation.
599. In order to ensure that on-street servicing and deliveries do not negatively impact on

the highway network, the council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor-space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:

600. (i) necessary to make the development acceptable in planning terms;
(ii) directly related to the development; and
(iii) fairly and reasonably related in scale and kind to the development.
601. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring. The bond for Phase 1 in this instance would be £55,700 based on the 542 residential units and 9992 sqm of non residential floorspace. The applicant has agreed to the contribution which can be collected via the legal agreement.

	P1	£	P2 (approx.)	£
Residential	542	54,200	tbc	
Non residential	9992	5,000		
		59,200		
Baseline	46 motorised vehicle trips per day		80 motorised vehicle trips per day	

Conclusion on Transport

602. The table below summarises how this development will contribute to delivering the Movement Plans 9 missions, Vision Zero, Healthy Streets and Air Quality.

Movement Plan mission		How they are addressing this?	Benefits		
			Healthy streets	Vision zero	Air quality

M1	Equality: Seeks to empower positive lifestyle choices and ensure safety when moving in the Borough.	The development provides a range of benefits to encourage active transport for all. Good pedestrian permeability, access to a range of cycling, good public transport.	✓	✓	✓
M2	Mental wellbeing: A focus on reducing noise and visual clutter.	Public realm space is set back from the Old Kent Road providing a quieter sheltered space for resting.	✓	✓	✓
M3	Physical wellbeing: Making active travel the first choice.	Development will be marketed as car free with information on access to cycling and walking development adjacent to Burgess Park and easy access to Quietway 1.	✓	✓	✓
M4	Manage space: Ensure flexibility to management of our streets over time.	This area will change over the next 10 years and by attaching a DSP bond will enable monitoring of trip generation throughout this time.	✓	✓	✓
M5	Support business: Creating more space, ease of movement and creating a more safe and pleasant environment.	The non residential is ground floor and has off street servicing that will accommodate the servicing needs. The location is well served by public transport and there will be dockless cycle hire.	✓	✓	✓

M6	Neighbourhoods: Make sure that people have places to connect.	The mixed use development with public open space located close to Burgess Park allows for good pedestrian permeability and space to dwell and rest.	✓	✓	✓
M7	Positive experience: Focus on reducing traffic on our roads and increasing safety.	Car free and the DSP bond help to manage traffic reduction	✓	✓	✓
M8	Change management: Work on understanding and responding positively to changes in construction or delivery due to new homes, offices or infrastructure.	The CEMP and DSP bond help change management. Event space has a travel plan.	✓	✓	✓
M9	Sharing information: Improve the way we exchange information with people.	Condition to require marketing material to promote car free living	✓	✓	✓

603. The Phase 1 proposal with the hotel is supported because it reduces car dependency provides improved pedestrian and cycle permeability, has residential management to reduce the impact of servicing and delivery and allows for the emerging plans for the surrounding public highway to be facilitated, subject to the following obligations and conditions:

604. S106 obligation for TfL to sign off hotel basement and piling detailed design.
 delivery and service plan bond details of parking, servicing and delivery management to encourage safety and sustainability;
 submission of a travel plan for the destination use;
 detailed design of the basement and servicing layout; and its relationship with the public highway including the gates.
 a bus contribution for TfL;
 car club membership;
 publicly accessible cycle hire and membership;
 detailed design of cycle parking;
 condition to ensure residents would not be eligible for parking permits in the controlled parking zone, or any future CPZ;
 condition for marketing details to ensure promotion of car free living; is clear to the new occupants of the development
 condition for hotel marketing to promote accessibility by public transport.
 s.278 works with the council for highway works, tree planting and traffic management changes to Rolls Road and Rowcross Street, and

a condition for a detailed construction and environmental management plan CEMP

605. For the Phase 2 proposal. This is supported as an outline design. That it will not be eligible to come forth for full planning permission until the Transport Works Act Order has been approved. As with Phase 1 the Phase 2 proposal generally reduces car dependency, provides good quality pedestrian and cycle permeability. The obligations and conditions will need to be reviewed at the time of full planning permission but at this stage should include:

- a specific obligation to ensure Phase 2 detailed design or any new proposal for that site will deliver the basement car park extension.
- delivery and service plan bond details of parking, servicing and delivery management to encourage safety and sustainability;
- submission of a travel plan for the destination use;
- detailed design of the basement and servicing layout;
- a bus contribution for TfL;
- car club membership;
- publicly accessible cycle hire and membership;
- detailed design of cycle parking;
- condition to ensure residents would not be eligible for parking permits in the controlled parking zone, or any future cpz;
- condition for marketing details to ensure promotion of car free living; is clear to the new occupants of the development
- condition for hotel marketing to promote accessibility by public transport.
- s.278 works with the council and TfL for highway works, tree planting and to
- secure the extended area of footway along Old Kent Road to be adopted as public highway, and
- a condition for a detailed construction and environmental management plan CEMP

Tree planting on Old Kent Road

606. An agreement under Section 278 of the Highways Act 1980 would be required with TfL in relation to the proposed works and tree planting on the footway. The process of negotiating the Section 278 agreement would give opportunity for detailed discussion about issues such as paving materials and the acceptability and potential species of street tree. Any planting should enable the Mayor's Healthy Streets plan for the Old Kent Road corridor. Please see the section on Trees at paragraph XX.

Noise and vibration

607. A Noise and Vibration Assessment has been undertaken as part of the ES to determine the likely noise impacts from the proposed development. In this regard, a demolition and construction management plan has been requested by condition which shall include that the constructors operate under the Code of Considerate Practice.

608. Noise levels within apartments will be controlled to the recommended internal noise levels. This will require use of mechanical ventilation heat recovery (MVHR) units to all apartments within the development and comfort cooling to all apartments and hotel rooms facing Old Kent Road or Humphrey Street.

609. External residential amenity areas between the proposed buildings will be provided

that are compliant with the recommended noise criterion (LAeq,16h 50-55 dB). Noise levels in external amenity areas facing Old Kent Road and Humphrey Street will exceed this criterion.

610. Noise from building services will be controlled so that it meets the relevant noise criterion based on the local authority requirements at the surrounding noise-sensitive receptors. Building services plant noise limits have been set on this basis and will be used as a basis of the building services design.

Planning obligations (S.106 undertaking or agreement)

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

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

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

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171	Agreed
Affordable housing monitoring	£9529.20	Agreed
Carbon Offset – Green Fund	£880,852	Agreed
Child playspace	£123,065	Agreed
Delivery and service bond	£55,700	Agreed
Transport for London Buses	Maximum cap £2,700 per unit up to £1,954,800 over five years.	Agreed
Transport for London cycle hire contribution	TfL request a significant contribution to be determined through discussion	Funded through CIL
Admin fee 2% for all Southwark cash contributions, plus flat fee of £2,000 for costs incurred transferring TfL buses contribution.	£23,606.34	Agreed
Total	A maximum of £3,058,723.54	

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

- Detailed design of Phase 1 and Phase 2 basement design for hotel, cinema and servicing basement. TfL as cosignatory
- Phase 2 detailed design or any new proposal for that site will deliver the basement extension to ensure servicing and car parking.
- Affordable housing provisions, including provision for an early stage review;
- Marketing, allocation and fit out of the wheelchair units;
- Business retention and relocation strategy
- Independent retail for the units in Phase 2
- Public access to open spaces and hotel lobby
- Phasing plans;
- Local economy – construction phase job/contributions
- Local economy – end use jobs/ contributions and employment;
- Highway works – s278 works;
- Transport for London – s278 works including highway works, tree planting and adoption of Old Kent Road frontage as public highway;
- Car club membership for 3 years;
- Connection to a future district heating system;
- London Living Wage – best endeavors to being offered to all staff employed in the commercial units, hotel and cinema as well as workers during the construction period;
- Delivery and service management plan;
- Demolition and construction management plan;
- Public realm works plan; and
- Securing of Pilbrow and Partners architects to deliver the detailed design of the scheme.
- Contribution to the management of the car parking on the Astley Cooper Estate.

614. In the event that a satisfactory legal agreement has not been entered into by 31 October 2019 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

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

Mayoral and Borough Community Infrastructure Levy (CIL)

616. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material “local financial consideration” in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark’s CIL will provide for infrastructure that supports growth in Southwark.

617. In this instance a Mayoral CIL payment a Southwark CIL payment would be required. As the scheme has been revised, the final updated figures will be included in the committee report addendum.

Sustainable development implications

Energy

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

Be lean (use less energy)

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

Be clean (supply energy efficiently)

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

Be green (low or carbon zero energy)

623. Roof mounted PV arrays are proposed to provide a green source of electricity to be utilised on site in the residential and commercial units and Air Source Heat Pumps (ASHP) are proposed to serve the retail units and hotel.. 87kWp of Photovoltaic (PV) arrays have been proposed for the development and their use has been maximised, taking into account the amount of roof space that would be required for cooling condenser plant and lift over runs.
624. It is considered that the scheme has maximised the potential of 'be lean', 'be clean' and 'be green' measures and does not have scope to reduce the carbon emissions any further. This is because of the high density nature of the scheme and the lack of

available roof space to include more PV panels.

625. The 'be lean', 'be clean' and 'be green' measures would result in an overall reduction in carbon dioxide emissions when compared to a scheme compliant with the building regulations. For the residential element, a 36.58% carbon reduction would be achieved falling short of the zero carbon requirements as set out in policy 5.2 of the London Plan, amounting to a 454.094 tonne shortfall. For the commercial element, a 29.35% reduction in carbon emissions would be achieved meeting the 35% target against Part L of the Building Regulations.
626. Recognising that the residential aspect fall below the policy requirements in relation to carbon savings, a contribution towards the council's carbon offset fund would be required. Calculated on the basis of £1,800 per tonne, the residential component would generate a contribution of £817,369 and the non residential £63,482.40 The applicant has agreed to make the contribution of £880,852 to the carbon off set fund which would therefore make this aspect of the scheme fully policy compliant.

Overheating

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

BREEAM

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

Ecology

629. An Ecological Impact Assessment was submitted with the application which has been reviewed by the council's ecology officer. A Phase 1 habitat survey and bat emergence surveys were undertaken in September 2018. The purpose of the assessment was to identify any ecological mitigation or enhancement measures. Six trees scheduled for removal were assessed as providing low bat roosting potential. A precautionary approach prior to felling was recommended and should be undertaken by a licensed bat ecologist. Furthermore, the introduced shrub and scattered trees on site have potential to support breeding birds. Where these features were to be affected they would be removed outside of the breeding bird season or cleared under the supervision of an ecologist. Overall, the assessment found that the site is considered to be of low value for nature conservation.
630. The replacement scheme offers an opportunity to enhance the biodiversity value of the site and a series of ecological enhancements are proposed including areas of biodiverse roofs, Sustainable Drainage Systems, rain gardens, new tree planting, a

mix of native and non native shrubs, and bird and bat boxes. It is recommended conditions be attached to secure the features, all of which have been included in the recommendation.

Air Quality

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

Lighting strategy

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

Ground conditions and contamination

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

Water resources and flood risk

636. A Flood Risk Assessment (FRA) has been provided, which confirms that the site is within Flood Zone 3a and is protected by flood defences and as a result, has low risk of tidal or fluvial flooding and low risk of surface and ground water flooding. The Environment Agency has reviewed the FRA and considers the scheme to be acceptable, subject to the imposition of conditions. These conditions are included on the draft decision notice.
637. The council's flood and drainage team have also reviewed the submitted material and Drainage Strategy, with the applicant submitting an addendum in response to initial

comments made. It can be confirmed that:

All sleeping accommodation has been set above the flood protection level of 2.65mAOD. Please find attached

30% of the ground floor of the site is permeable amenity space

The targeted discharge rates from the site, in line with greenfield rates for each duration are as follows;

1 in 1 year storm - 3.60 l/s

1 in 30 year storm - 9.77 l/s

1 in 100 year storm - 13.55 l/s.

638. The drainage strategy incorporating blue and green roofs as well as permeable paving and underground storage tanks is supported.
639. The scheme includes provision for a large basement to be delivered across two phases. A basement impact assessment has been submitted and no concerns were raised from a flood risk perspective and would not have a detrimental impact on the environment.
640. The assessment concluded that the proposed development can be constructed without adverse impacts to groundwater, surface water, and ground movements. This is facilitated by the anticipated stiff ground in the area, and the distance to the majority of neighbouring structures. However, as noted in the Transport section of this report, TfL has raised significant concerns regarding the potential impact the foundations and basements could have on the running tunnels. These will be addressed through a side agreement.

Archaeology

641. The application site is located within two LPA designated Archaeological Priority Areas - Bermondsey Lake and the Old Kent Road. The New Southwark Plan Evidence Base: Archaeological Priority Areas (APAs) proposes that these Priority Areas are amalgamated into a large Tier 1 APA called North Southwark and Roman Roads.
642. The applicant has submitted an archaeological Desk Based Assessment (DBA) to support this application in accordance with Saved Policy 3.19 Archaeology of the Southwark Plan (2007). The DBA is approved. This site has been subject to previous archaeological investigations in the 1990s (Archaeological Site Code HPS 93) where multi-phase prehistoric, Roman and post-medieval archaeology were discovered. The HPS 93 evaluation of the site provides sufficient information to help inform future planning requirements and further pre-determination archaeological evaluation is not required.
643. 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 the suggested conditions are applied to any future consent.

Wind microclimate

644. The ES considers the potential impacts and associated likely effects of the proposed development on the local wind microclimate within and around the application site. In particular, it considers the potential effects of wind upon pedestrian comfort and summarises the findings of a wind tunnel testing exercise.

645. The extensive wind tunnel tests provided a detailed assessment of the mean and gust wind conditions around the Proposed Development in terms of pedestrian comfort and safety, and a basis to assess the effect of the Proposed Development relative to the existing site conditions and the suitability of the wind microclimate for various proposed pedestrian and site occupant activity.
646. The assessment of the wind conditions at the application site requires a standard against which the measurements can be compared. The submitted assessment uses the Lawson Comfort Criteria, which have been established for over 30 years. The Criteria, which seeks to define the reaction of an average pedestrian to the wind, are described in the table below. If the measured wind conditions exceed the threshold wind speed for more than 5 % of the time, then they are unacceptable for the stated pedestrian activity and the expectation is that there may be complaints of nuisance or people will not use the area for its intended purpose.

Table: Lawson Comfort criteria

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

648. Wind conditions in Phase 1 and Phase 2 of the Proposed Development are broadly similar to the baseline scenario with some areas becoming windier and other areas becoming calmer. This was largely expected due to the massing of the Proposed Development compared to the existing buildings on site.

The majority of the site was found to be suitable for its intended use; however, some isolated areas at ground and roof level were found to be windier than desired conditions and/or exceeded the criteria for pedestrian safety. As such there would require mitigation to reduce wind speeds to provide a suitable wind environment without any safety exceedances. Mitigation measures would be assessed through further wind tunnel testing, secured by a planning condition, to verify their effectiveness

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

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

Health impact assessment

651. The applicant has submitted a Health Impact Assessment as an ES appendix. The main health effects are anticipated to be on the existing local community and existing employees in the area who would be exposed to a phased programme of construction work. Good construction management would help minimise these impacts, and accordingly a construction management will be secured in line with the council's normal practice.

652. The residents, employees and retail users of the development would benefit from a high quality design and good planning which will help reduce health care costs over time by preventing ill-health from risks attributed to urban planning, including air pollution, road injuries, worklessness and poor housing.

Socio-economic impacts

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

654. The assessment has considered the following potential impacts:
Provision of new homes;
Generation of a new resident population;
Loss of existing commercial floorspace and creation of new commercial/leisure/community floorspace;
Introduction of a new worker population; and
Change in the site conditions with regard to surveillance, activity and lighting.

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

656. The demolition and construction stage of the proposed development is expected to generate the creation of direct and indirect construction employment, which is considered a temporary effect. Phase 1 with a build cost of £188 million would

generate 317 FTE construction jobs. Phase 2 with a build cost of £53.5 million would generate 120 FTE construction jobs. The completed development would result in a net increase of approximately 108 jobs on-site.

657. The proposed development is expected to generate a range of potential significant direct and indirect social and economic impacts, with likely permanent effects.
658. The proposed development's forecast child yield would result in an increased demand for school places. The proposed development would create a demand for 117 primary aged places and 49 secondary aged places.
659. The draft OKR AAP sets plans for a new secondary school and two new primary schools, which would be funded from the council's CIL.
660. The additional population due to the construction of the Proposed Development would result in the need for one additional GP in the local area. This may be able to be provided within existing healthcare facilities as it is understood that GPs can accept new patients.
661. The draft OKR AAP includes proposals to expand the existing health facility on Verney Road, which would meet the anticipated demand from the development, and can be funded from the CIL payment.
662. There could be a high risk of crime to be committed as there is a high level of crime in the local area and the application site is a conducive environment for crime outside of retail hours, when there is significantly less activity in the space.
663. In terms of crime prevention design measures, the following are proposed following consultation with the Metropolitan Police:
The ground floor layout has been designed to maximise opportunities for passive surveillance of the public realm spaces. Entrances will be well lit and overlooked, public areas will be uniformly well-lit.
The ground floor layout provides good visibility to access routes and spaces, and good accessibility to the spaces. Controlled access to relevant areas of the scheme has been addressed such as the residential units and the development will incorporate CCTV.
The commercial units are intended to provide both activation and passive surveillance, but also to act as a catalyst for wider improvements within the area, with a view to contributing towards a reduction in crime.

Fire safety

664. The applicant has submitted a fire safety strategy with the application based on the requirements of the relevant Building Control standard BS 9991:2015 for residential parts of the site and BS 9999:2017 for non residential areas.
665. The strategy outlines the fire safety strategy proposals for the development and seeks to demonstrate compliance with the Building Regulations (generally in the form of the recommendations of Approved Document B).
666. The designs of the residential blocks, such as travel distances are compliant within the common areas in accordance with BS9991 since the blocks will be sprinklered. A

system of smoke clearance via a Mechanical Smoke Ventilation System is proposed for all cores. The smoke shafts will include automatic opening vents (AOV's) at each level within the common corridors with an automatic vent at the top of the stairs.

667. The hotel is provided with two staircases therefore the travel distances are code compliant in accordance with Approved Document B (ADB). The hotel is proposed to be provided with an automatic fire alarm and detection system designed in accordance with BS5839 Part 1 to an L2 standard.
668. The retail units are proposed to be provided with an automatic fire alarm and detection system designed in accordance with BS5839 Part 1 and be at least of a manual type whilst the cinema and car park are proposed to be provided with an automatic fire alarm and detection system designed in accordance with BS5839 Part 1 to an L3 and L5 standard respectively.
669. The hotel, the cinema and the car park will require to be provided with disabled refuges since they operate on floors above and below ground floor level where escape is not possible directly to outside.
670. Elements of structures within each block will vary between 90 minutes to 120 minutes fire resistance depending on the height of the core.
671. All blocks are above 18m in height therefore they will be provided with firefighting shafts. Each shaft will incorporate a firefighting stair, smoke clearance and a dry main. A firefighting lift will also be provided as appropriate for each firefighting shaft concerned as well as a firefighting lobby in the case of the hotel. Since Block 1A is over 50m in height, it will require to be provided with a wet riser.
672. Based upon the above proposals it is considered that adequate measures are provided to meet the functional requirements of the Building Regulations and that that the development would provide for a high standard of safety for occupants of the building.

Aviation

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

Television and radio signals

674. A desktop-based Telecommunication Network Impact Assessment has been performed to assess the possible effects and impacts on the reception of television and radio broadcast services from the proposed development. The use of tower cranes and the proposed development could cause disruption to the reception of digital satellite television services to the north west of the site on the opposite side of Old Kent Road.
675. Ofcom, telecommunications operators and other wireless infrastructure users were contacted to determine the possible impacts to existing radio communications infrastructure arising from the proposed redevelopment. Tall buildings can cause disruption to telecommunications network operations by creating physical obstructions

between transmit and receive locations. It is a requirement under the current London Plan and recently updated NPPF that developers investigate the potential impacts to local telecommunications networks and systems from proposed developments.

676. Several existing microwave links were identified that crossed over the application site and impact assessments have been undertaken to determine the magnitude and effects of any possible interference. Initially, Arqiva who manage two links that pass near to the site raised concerns about tower crane movements, but it is expected that once this link is rerouted due to interference arising from two other local schemes, no adverse impacts would exist from the proposed development.
677. One link owned by Vodafone passes through the proposed development. Correspondence with Vodafone has indicated that this link is to be decommissioned. Once decommissioned, there would be no opportunity for the proposed development to cause any adverse effects to the link's operation.
678. Other links owned by Airwave Solutions, The Port of London Authority and Wifinity pass at acceptable clearance distances to the scheme and consequently will not be detrimentally impacted.
679. With respect to other telecommunication technologies, particularly radio networks owned and managed by The JRC (the company that provides telecommunications for the UK's gas and electricity networks), the JRC has confirmed that the proposed development is unlikely to cause any interference to the radio networks they manage for UK Power Networks & Southern Gas Networks.
680. Based on impact assessments and the replies to date, it is considered that once Arqiva's microwave link has been rerouted to avoid the obstruction created by other schemes (596-608 Old Kent Road / Land at Livesey Place and Cantium Retail Park), the proposed development would have a neutral effect on local telecommunications systems and networks.

Statement of Community Involvement

681. Consultation was carried out by the applicant prior to the submission of the planning application. The consultation was carried out with the local community and key stakeholders from the area and included the following forms of activity:

Holding a series of one-to-one meetings, including attendance at the LB Southwark Old Kent Road Forum with key stakeholders from June to October 2018 to explain the proposals and to receive feedback;

Holding a two-day public exhibition in June 2018 to give people the opportunity to view the initial plans and discuss the proposals with the Applicant and the project team that was attended by 44 people.

Holding a two-day public exhibition in September 2018 to give people the opportunity to view the updated plans and discuss the proposals with the Applicant and the project team that was attended by 50 people.

Hosting a website to provide stakeholders with information on its development plans. The website has been visited 775 times by 650 different individuals from 29th June to 18th October 2018.

682. To summarise, a number of key themes have emerged as a result of feedback from stakeholders. There was a broad level of understanding that the Old Kent Road AAP

has informed issues such as height, density and capacity. However despite this, there was some concern from residents about the prospects of overdevelopment in the area.

683. There was broad support for the affordable housing provisions, the proposed mix of retail and leisure uses and the public realm improvements. Nevertheless queries were raised about the following issues

:

Building heights
Leisure/retail/commercial opportunities
Impact on transport/parking
Affordable housing
Construction/phasing of development
Environmental impacts
Public Realm
Impact on Burgess Park
Location of hotel

Other matters

684. None.

Community impact statement / Equalities Assessment

685. 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.

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

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

688. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. It is not considered that

this proposal would give rise to any equalities issues in respect of persons sharing the relevant characteristics set out above.

Conclusion on planning issues

689. The major redevelopment of the site is supported and welcomed in principle. The principle of housing on the site is also accepted, and would be in line with policy aspirations to increase the number of new housing units in the area.
690. The reduction in retail floorspace is considered acceptable, when taking into account the overall uplift in other commercial floorspace which includes a cinema, café/restaurants which are currently unrepresented in the town centre. The hotel is supported in this location. In advance of the Old Kent Road being an adopted town centre, the quantum of town centre uses including retail, hotel and cinema uses fully accords with the sequential approach to development and therefore can be supported.
691. The proposed mix of uses, including the hotel and cinema uses would add to the vibrancy of the area which is complemented by the substantial public realm improvements with the creation of new routes which would significantly improve permeability and connectivity in the area. The proposal would provide an extensive improvement of the streetscape together with new active frontages along the Old Kent Road which would improve the experience for pedestrians.
692. The scheme would deliver the following major regeneration benefits:
- 724 new homes to the borough's housing stock;
 - 35.52% affordable housing by habitable room;
 - A total of 219 new affordable homes, of which 148 would be social rented;
 - The re-provision of retail floorspace including large format and flexible retail space.
 - 10% independent retail for the retail units
 - A 195 bed hotel
 - A commitment to the London Living Wage for new employees
 - A two screen cinema
 - An uplift of up to 108 jobs on-site jobs
 - A new public square as part of a landscaped civic public realm within a new town centre location, including an uplift in the number of trees.
 - Sustainable design throughout the scheme.
 - Improved connectivity for cyclists and pedestrians;
 - Greenfield rates of run off.
693. The proposal would deliver a very high standard of accommodation, which would comply with the majority of the standards and principles of exemplary residential design, as set out in Southwark's residential design standards SPD. In particular, the scheme would include a majority of dual aspect units of 53% for Phase 1 of the scheme which is considered very good taking into account the high density of the scheme.
694. Whilst there would be some harm to the surrounding conservation areas, this would be less than substantial should be weighed against the wider regeneration benefits of the scheme as set out above.

695. The impacts of the scheme in relation to daylight and sunlight are on balance considered acceptable, and whilst there would be departures from the BRE guidelines, the daylight and sunlight levels are still considered adequate for a dense urban area.
696. Overall, the major regeneration benefits of the proposal are considered to outweigh the harm to the setting of the conservation areas and the daylight losses to some of the surrounding residential properties.
697. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, referral to the Secretary of State and the completion of a Section 106 Legal Agreement with TfL as a cosignatory, under the terms as set out above.

Community impact statement

Consultations

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

Consultation replies

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

Summary of consultation responses

700. 37 objections received on following grounds:

701. Objection: Impact on views of St Paul's Cathedral from Nunhead Cemetery

702. Officer response: This is assessed within the main body of the report. It is officers view that the view of St Paul's Cathedral from Nunhead Cemetery is not harmed as the proposal does not extend into the draft protected view geometry. The proposed 48 storey tower is sited to the east of the Wider Assessment

703. Objection: Affordable flats suffer from poor internal conditions.

704. Officer response: All the proposed units meet the majority of exemplary design standards and will offer very good accommodation

705. Objection: Proposed scheme wipes away existing area and no integration of the scheme into existing area. Hotel and tall buildings overly large and out of context.

706. Officer response: The application proposes the comprehensive redevelopment of the site and offers significant regeneration benefits and town centre uses.

707. Objection: Proposed density is excessive and damages the local area.

708. Officer response: The successfully scheme optimises the use of the site and will enhance the local area in terms of new homes, jobs, town centre use and public realm

709. Objection: Land values will rise forcing our existing businesses.

710. Officer response: This is not a planning matter
711. Objection: Loss of the retail shops will impact local community and mean longer trips to this type of shop.
712. Officer response: Retail reprovision is proposed as part of the application. Conversations as to the type of retailers who will lease space are ongoing with the developer and retailers. As the proposal is phased two retail units will remain in situ until the mid 2020s
713. Objection: Scheme is premature as AAP has not been adopted and further consultation needed on masterplan
714. Officer response: This is addressed in the main body of the report.
715. Objection: Impact on local heritage
716. Officer response: This is addressed in depth in the main body of the report.
717. Objection: Impact on delivery of Bakerloo Line Extension, which is still unfunded.
718. Officer response: Discussions with TfL and the applicant are ongoing in relation to the delivery of the BLE. As noted in the main body of the report, it is suggested that TfL are a cosignatory of the s106 legal agreement.
719. Objection: Car free development is unrealistic as not everyone can walk or cycle. Impact on surrounding roads as a result of parking by new residents. Increased vehicular congestion
720. Officer response: Car parking on local roads is managed using CPZs. Car free development is policy compliant.
721. Objection: Proposed public spaces are too narrow
722. Officer response: The proposed public realm would provide a significant, high quality improvement to the existing offer
723. Objection: Not enough infrastructure for new residents
724. Officer response: Infrastructure will be upgraded using community infrastructure funding. The OKR AAP plans for the required improvements to services.
725. Objection: High rents will exclude smaller local businesses
726. Officer response: 10% affordable retail floorspace is proposed for the scheme.
727. Objection: Poor internal layout of flat with single aspect flats described as dual aspect flats
728. Officer response: The number of dual aspect units has been clarified.
729. Objection: The proposed material palette is vague.

730. Officer response: Materials will be secured by condition
731. Objection: Precedent setting for tall buildings within the area
732. Officer response: The proposed scheme broadly follows the emerging masterplan for the area.
733. Objection: Wind shear and turbulence as a result of tall buildings
734. Officer response: Mitigation for any negative impacts will be secured through condition. Overall the wind performance is good
735. Objection: Homogenous design of buildings. Ground floor entrance doors are poorly designed.
736. Officer response: .This mixed use scheme is well designed and will deliver a variety of town centre uses. The residential design is well considered and will provide an excellent standard of accommodation.
737. Objection: Fire safety of the tower.
738. Officer response: A fire safety strategy has been submitted that sets out how fire safety will be addressed within the development. London Fire Brigade has raised no objections to the scheme.
739. Objection: Concerns of public realm accessibility for the visually impaired
740. Officer response: The landscaping of the public realm will be secured by condition to ensure access for all.

Statutory and non statutory consultees

Greater London Authority:

741. That Southwark Council has been advised the application does not comply with the London Plan and draft London Plan. However, resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.
742. Principle of development: The proposed land uses are supported. Development must be designed to protect the delivery of the Bakerloo Line Extension and the applicant is required to work closely with TfL to ensure this. Demonstration of how the hotel will operate without the servicing area proposed in a later phase is required.
743. Affordable housing: This publicly owned site should deliver 50% to follow the Fast Track Route. The scheme currently delivers 35%. The delivery of the majority of the affordable housing on Phase 2 is not supported. The viability report is being scrutinised by the GLA.
744. Retail and Hotel: The hotel use is supported provided it can be serviced and does not impact delivery of the BLE. Retail use within the a revitalised town centre is supported
745. Design: Site layout and massing is supported. Details must be secured to ensure the delivery of a high quality development.

746. Heritage: No substantive comments.

747. Transport: The proposals could prejudice the delivery of the Bakerloo Line Extension and the site may also need to accommodate one of the Old Kent Road's two BLE stations. Discussions between the developer, TfL and Southwark Council should therefore ascertain whether the proposal can accommodate anticipated BLE requirements or will need to be substantially revised in order to comply with relevant London Plan and draft London Plan policies that safeguard and provide for new public transport infrastructure. The following transport matters also need satisfactory clarification and resolution:

- Further work is required to rectify issues with the submitted trip generation and modal split;
- Cycle parking issues require resolution;
- Car parking issues require resolution;
- Servicing proposals are contrary to policy and require resolution;
- Draft Construction Traffic/Logistics management Plan currently inadequate;
- DSP and CLP need to be enhanced;
- Contributions towards active travel and bus services and priority are required; and
- Pedestrian and public realm improvements and revisions are necessary to provide a safe and comfortable environment.

748. Further information on Energy, Drainage and Urban Greening is required.

749. Historic England: The development would have major townscape impact in a wide range of views, many of which we consider to be harmful to the historic environment. This representation is assessed in detail in the main body of the report.

750. Conservation Area Advisory Group – Meeting 21 January 2019

CAAG did not object to the proposal, however, they noted that this tall building will be almost 3 times taller than any other towers in the Masterplan. They felt this was excessive and would not be part of a cluster.

They felt the architecture was generic – not characteristic of the area and did not refer to the rich architectural heritage of the Old Kent Road

The tower needs a better 'top'

They felt the hotel was too tall and dominant – at the northern end of the Park

The landscape is dominated by low maintenance hardscape (currently 1/3 green to 2/3 hard paving) these proportions need to be reversed and the landscape made more green.

They stressed the importance of trees both on the OKR frontage and Humphrey Street frontage. This is especially important on Humphrey Street and at the corner with the OKR which is visible from Albany Road.

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

752. Arquiva: Arquiva raised concerns about the potential impact of cranes with avital broadcast dish link, during the construction process and the need to for a condition to

agree the construction methodology.

753. Whilst it is correct that the link that might be affected, is likely to be rerouted because of other proposals elsewhere, this has yet to be agreed with those other developers (also being helpfully advised by GTech Surveys Ltd) and there is no certainty on the timing of all the respective developments
754. Arquiva therefore remain of the view that a condition is still necessary to require the agreement of the construction methodology and in particular the siting of cranes. As such, they object to this application on the grounds that it will directly interfere with the terrestrial television broadcast network, a matter of national interest.
755. Metropolitan Police: This development is suitable to achieve Secured By Design accreditation. It is therefore appropriate to attach a 'Secured by Design' condition for the whole development.
756. Natural England: No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected sites.
757. Environment Agency: No objections subject to conditions.
758. London Fire Brigade: No objections provided that an undertaking to ensure fire appliance access is made.
759. National Air Traffic Safeguarding: The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) public Limited Company ("NERL") has no safeguarding objection to the proposal.
760. Public Health: No objection but make the following comments:
Concerns over potential A5 use proposed. *Comment - No A5 uses are now proposed*
Social rented unit mix is supported
Concern over phase 2 not coming forward and impacting social housing delivery.
Wind shear impacts need to be mitigated
Explore smoke-free public realm

Reconsultation

761. Reconsultation response will be summarised in the committee report addendum.

Human rights implications

762. 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.
763. This application has the legitimate aim of providing a redevelopment of the existing site to include new residential, retail, office and destination space uses in a development rising to 48 storeys. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/ 2316-2 Application file: 18/AP/3551 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5513 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Tom Buttrick, Team Leader Old Kent Road	
Version	Final	
Dated	1 May 2019	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES /CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		03 May 2019

Consultation undertaken

Site notice date: 05/12/2018

Press notice date: 06/12/2018

Case officer site visit date: n/a

Neighbour consultation letters sent: 30/11/2018

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

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

Neighbour and local groups consulted:

59 Chaucer Drive London SE1 5TA
57 Chaucer Drive London SE1 5TA
55 Chaucer Drive London SE1 5TA
61 Chaucer Drive London SE1 5TA
18 Chaucer Drive London SE1 5TA
65 Chaucer Drive London SE1 5TA
63 Chaucer Drive London SE1 5TA
45 Chaucer Drive London SE1 5TA
43 Chaucer Drive London SE1 5TA
41 Chaucer Drive London SE1 5TA
47 Chaucer Drive London SE1 5TA
53 Chaucer Drive London SE1 5TA
51 Chaucer Drive London SE1 5TA
49 Chaucer Drive London SE1 5TA
138 Chaucer Drive London SE1 5RG
100 Chaucer Drive London SE1 5RG
98 Chaucer Drive London SE1 5RG
96 Chaucer Drive London SE1 5RG
102 Chaucer Drive London SE1 5RG
108 Chaucer Drive London SE1 5RG
106 Chaucer Drive London SE1 5RG
104 Chaucer Drive London SE1 5RG
86 Chaucer Drive London SE1 5RG
84 Chaucer Drive London SE1 5RG
82 Chaucer Drive London SE1 5RG
88 Chaucer Drive London SE1 5RG
94 Chaucer Drive London SE1 5RG
92 Chaucer Drive London SE1 5RG
90 Chaucer Drive London SE1 5RG
128 Chaucer Drive London SE1 5RG
126 Chaucer Drive London SE1 5RG
124 Chaucer Drive London SE1 5RG
130 Chaucer Drive London SE1 5RG
136 Chaucer Drive London SE1 5RG
134 Chaucer Drive London SE1 5RG
132 Chaucer Drive London SE1 5RG
114 Chaucer Drive London SE1 5RG
112 Chaucer Drive London SE1 5RG
110 Chaucer Drive London SE1 5RG
116 Chaucer Drive London SE1 5RG
122 Chaucer Drive London SE1 5RG
120 Chaucer Drive London SE1 5RG
118 Chaucer Drive London SE1 5RG
13 Milton Close London SE1 5TD
12 Milton Close London SE1 5TD
11 Milton Close London SE1 5TD
14 Milton Close London SE1 5TD
2 Wordsworth Road London SE1 5TX
1 Wordsworth Road London SE1 5TX
15 Milton Close London SE1 5TD
6 Milton Close London SE1 5TD
5 Milton Close London SE1 5TD
4 Milton Close London SE1 5TD
7 Milton Close London SE1 5TD
10 Milton Close London SE1 5TD
9 Milton Close London SE1 5TD
8 Milton Close London SE1 5TD
12 Wordsworth Road London SE1 5TX
11 Wordsworth Road London SE1 5TX
10 Wordsworth Road London SE1 5TX
13 Wordsworth Road London SE1 5TX
16 Wordsworth Road London SE1 5TX
15 Wordsworth Road London SE1 5TX
14 Wordsworth Road London SE1 5TX
5 Wordsworth Road London SE1 5TX
4 Wordsworth Road London SE1 5TX
3 Wordsworth Road London SE1 5TX
6 Wordsworth Road London SE1 5TX
9 Wordsworth Road London SE1 5TX
8 Wordsworth Road London SE1 5TX
7 Wordsworth Road London SE1 5TX
3 Milton Close London SE1 5TD
21 Longfellow Way London SE1 5TB

Flat 64 Astley House Astley Estate SE1 5HT
Flat 63 Astley House Astley Estate SE1 5HT
Flat 66 Astley House Astley Estate SE1 5HT
Flat 69 Astley House Astley Estate SE1 5HT
Flat 68 Astley House Astley Estate SE1 5HT
Flat 67 Astley House Astley Estate SE1 5HT
Flat 58 Astley House Astley Estate SE1 5HT
Flat 57 Astley House Astley Estate SE1 5HT
Flat 56 Astley House Astley Estate SE1 5HT
Flat 59 Astley House Astley Estate SE1 5HT
Flat 62 Astley House Astley Estate SE1 5HT
Flat 61 Astley House Astley Estate SE1 5HT
Flat 60 Astley House Astley Estate SE1 5HT
Flat 79 Astley House Astley Estate SE1 5HT
Flat 78 Astley House Astley Estate SE1 5HT
Flat 77 Astley House Astley Estate SE1 5HT
Flat 80 Astley House Astley Estate SE1 5HT
Flat 83 Astley House Astley Estate SE1 5HT
Flat 82 Astley House Astley Estate SE1 5HT
Flat 81 Astley House Astley Estate SE1 5HT
Flat 72 Astley House Astley Estate SE1 5HT
Flat 71 Astley House Astley Estate SE1 5HT
Flat 70 Astley House Astley Estate SE1 5HT
Flat 73 Astley House Astley Estate SE1 5HT
Flat 76 Astley House Astley Estate SE1 5HT
Flat 75 Astley House Astley Estate SE1 5HT
Flat 74 Astley House Astley Estate SE1 5HT
Flat 10 Gloucester Court SE1 5HQ
Flat 9 Gloucester Court SE1 5HQ
Flat 8 Gloucester Court SE1 5HQ
Flat 11 Gloucester Court SE1 5HQ
Flat 1a Astley House Astley Estate SE1 5HU
Flat 13 Gloucester Court SE1 5HQ
Flat 12 Gloucester Court SE1 5HQ
Flat 3 Gloucester Court SE1 5HQ
Flat 2 Gloucester Court SE1 5HQ
Flat 1 Gloucester Court SE1 5HQ
Flat 4 Gloucester Court SE1 5HQ
Flat 7 Gloucester Court SE1 5HQ
Flat 6 Gloucester Court SE1 5HQ
Flat 5 Gloucester Court SE1 5HQ
3 Otterden Terrace 10 Lynton Road SE1 5QR
2 Otterden Terrace 10 Lynton Road SE1 5QR
1 Otterden Terrace 10 Lynton Road SE1 5QR
4 Otterden Terrace 10 Lynton Road SE1 5QR
Flat D 79 Dunton Road SE1 5TW
Basement Flat 9 Cobourg Road SE5 0HT
First Floor Flat A 9 Cobourg Road SE5 0HT
Flat 1b Astley House Astley Estate SE1 5HU
Ground Floor Flat 9 Cobourg Road SE5 0HT
Ground Floor 361-363 Old Kent Road SE1 5JH
Part Second Floor 361-363 Old Kent Road SE1 5JH
Walworth Academy 34-40 Shorcliffe Road SE1 5UJ
Flat 12 Windsor Court SE1 5JA
Rear Flat 382 Old Kent Road SE1 5AA
Basement And Ground Floor Flat 384 Old Kent Road SE1 5AA
First Floor Flat 376 Old Kent Road SE1 5AA
Rainbow Nursery Astley Estate SE1 5HU
Flat 7 Windsor Court SE1 5JA
Flat 6 Windsor Court SE1 5JA
Flat 5 Windsor Court SE1 5JA
Flat 8 Windsor Court SE1 5JA
Flat 11 Windsor Court SE1 5JA
Flat 10 Windsor Court SE1 5JA
Flat 9 Windsor Court SE1 5JA
Basement To Second Floor 304 Old Kent Road SE1 5UE
Flat 1 Windsor Court SE1 5JA
Flat 4 Windsor Court SE1 5JA
Flat 3 Windsor Court SE1 5JA
Flat 2 Windsor Court SE1 5JA
Living Accommodation Lord Nelson SE1 5AA
366 Old Kent Road London SE1 5AA
362 Old Kent Road London SE1 5AA

20 Longfellow Way London SE1 5TB
19 Longfellow Way London SE1 5TB
22 Longfellow Way London SE1 5TB
25 Longfellow Way London SE1 5TB
24 Longfellow Way London SE1 5TB
23 Longfellow Way London SE1 5TB
14 Longfellow Way London SE1 5TB
13 Longfellow Way London SE1 5TB
12 Longfellow Way London SE1 5TB
15 Longfellow Way London SE1 5TB
18 Longfellow Way London SE1 5TB
17 Longfellow Way London SE1 5TB
16 Longfellow Way London SE1 5TB
35 Longfellow Way London SE1 5TB
34 Longfellow Way London SE1 5TB
33 Longfellow Way London SE1 5TB
36 Longfellow Way London SE1 5TB
2 Milton Close London SE1 5TD
1 Milton Close London SE1 5TD
37 Longfellow Way London SE1 5TB
28 Longfellow Way London SE1 5TB
27 Longfellow Way London SE1 5TB
26 Longfellow Way London SE1 5TB
29 Longfellow Way London SE1 5TB
32 Longfellow Way London SE1 5TB
31 Longfellow Way London SE1 5TB
30 Longfellow Way London SE1 5TB
17 Wordsworth Road London SE1 5TX
8 Chaucer Drive London SE1 5TA
6 Chaucer Drive London SE1 5TA
4 Chaucer Drive London SE1 5TA
10 Chaucer Drive London SE1 5TA
16 Chaucer Drive London SE1 5TA
14 Chaucer Drive London SE1 5TA
12 Chaucer Drive London SE1 5TA
13 Chaucer Drive London SE1 5TA
11 Chaucer Drive London SE1 5TA
9 Chaucer Drive London SE1 5TA
15 Chaucer Drive London SE1 5TA
2 Chaucer Drive London SE1 5TA
19 Chaucer Drive London SE1 5TA
17 Chaucer Drive London SE1 5TA
67 Oxley Close London SE1 5HF
65 Oxley Close London SE1 5HF
63 Oxley Close London SE1 5HF
69 Oxley Close London SE1 5HF
75 Oxley Close London SE1 5HF
73 Oxley Close London SE1 5HF
71 Oxley Close London SE1 5HF
53 Oxley Close London SE1 5HF
51 Oxley Close London SE1 5HF
49 Oxley Close London SE1 5HF
55 Oxley Close London SE1 5HF
61 Oxley Close London SE1 5HF

59 Oxley Close London SE1 5HF
57 Oxley Close London SE1 5HF
7 Chaucer Drive London SE1 5TA
9 Keats Close London SE1 5TZ
8 Keats Close London SE1 5TZ
7 Keats Close London SE1 5TZ
10 Keats Close London SE1 5TZ
13 Keats Close London SE1 5TZ
12 Keats Close London SE1 5TZ
11 Keats Close London SE1 5TZ
2 Keats Close London SE1 5TZ
1 Keats Close London SE1 5TZ
18 Wordsworth Road London SE1 5TX
3 Keats Close London SE1 5TZ
6 Keats Close London SE1 5TZ
5 Keats Close London SE1 5TZ
4 Keats Close London SE1 5TZ
23 Keats Close London SE1 5TZ

358 Old Kent Road London SE1 5AA
368 Old Kent Road London SE1 5AA
Flat 1 Mandeville House Astley Estate SE1 5DX
Lord Nelson 386 Old Kent Road SE1 5AA
Ground Floor 374 Old Kent Road SE1 5AA
296a Old Kent Road London SE1 5UE
Flat 8 The Old Fire Station Building SE1 5QY
Flat 7 The Old Fire Station Building SE1 5QY
5 Oakley Place London SE1 5AD
356 Old Kent Road London SE1 5AA
7 Oakley Place London SE1 5AD
6 Oakley Place London SE1 5AD
Flat 19 Mandeville House Astley Estate SE1 5DX
Flat 18 Mandeville House Astley Estate SE1 5DX
Flat 17 Mandeville House Astley Estate SE1 5DX
Flat 2 Mandeville House Astley Estate SE1 5DX
Flat 22 Mandeville House Astley Estate SE1 5DX
Flat 21 Mandeville House Astley Estate SE1 5DX
Flat 20 Mandeville House Astley Estate SE1 5DX
Flat 12 Mandeville House Astley Estate SE1 5DX
Flat 11 Mandeville House Astley Estate SE1 5DX
Flat 10 Mandeville House Astley Estate SE1 5DX
Flat 13 Mandeville House Astley Estate SE1 5DX
Flat 16 Mandeville House Astley Estate SE1 5DX
Flat 15 Mandeville House Astley Estate SE1 5DX
Flat 14 Mandeville House Astley Estate SE1 5DX
Flat 6 The Old Fire Station Building SE1 5QY
Flat B 354 Old Kent Road SE1 5AA
Flat A 354 Old Kent Road SE1 5AA
Second And Third Floor Flat Thomas A Becket SE1 5UE
Flat C 354 Old Kent Road SE1 5AA
3a Oakley Place London SE1 5AD
2 Oakley Place London SE1 5AD
2a Oakley Place London SE1 5AD
Flat 2 298 Old Kent Road SE1 5UE
Flat 1 298 Old Kent Road SE1 5UE
63a Oxley Close London SE1 5HF
Flat 3 298 Old Kent Road SE1 5UE
First Floor Flat Thomas A Becket SE1 5UE
First Floor Studio Flat Thomas A Becket SE1 5UE
Flat 1 The Old Fire Station Building SE1 5QY
Flat 5 361 Old Kent Road SE1 5JH
Flat 2 364 Old Kent Road SE1 5AA
Flat 2 The Old Fire Station Building SE1 5QY
Flat 5 The Old Fire Station Building SE1 5QY
Flat 4 The Old Fire Station Building SE1 5QY
Flat 3 The Old Fire Station Building SE1 5QY
4 Oakley Place London SE1 5AD
4a Oakley Place London SE1 5AD
3 Oakley Place London SE1 5AD
290a Old Kent Road London SE1 5UE
Flat 1 364 Old Kent Road SE1 5AA
1a Shorncliffe Road London SE1 5UE
Maisonette First Floor And Second Floor 362 Old Kent Road SE1 5AA
31 Bushwood Drive London SE1 5RE
30 Bushwood Drive London SE1 5RE
29 Bushwood Drive London SE1 5RE
32 Bushwood Drive London SE1 5RE
35 Bushwood Drive London SE1 5RE
34 Bushwood Drive London SE1 5RE
33 Bushwood Drive London SE1 5RE
24 Bushwood Drive London SE1 5RE
23 Bushwood Drive London SE1 5RE
22 Bushwood Drive London SE1 5RE
25 Bushwood Drive London SE1 5RE
28 Bushwood Drive London SE1 5RE
27 Bushwood Drive London SE1 5RE
26 Bushwood Drive London SE1 5RE
8 Burnham Close London SE1 5RL
7 Burnham Close London SE1 5RL
6 Burnham Close London SE1 5RL
9 Burnham Close London SE1 5RL

22 Keats Close London SE1 5TZ
21 Keats Close London SE1 5TZ
24 Keats Close London SE1 5TZ
5 Chaucer Drive London SE1 5TA
3 Chaucer Drive London SE1 5TA
1 Chaucer Drive London SE1 5TA
16 Keats Close London SE1 5TZ
15 Keats Close London SE1 5TZ
14 Keats Close London SE1 5TZ
17 Keats Close London SE1 5TZ
20 Keats Close London SE1 5TZ
19 Keats Close London SE1 5TZ
18 Keats Close London SE1 5TZ
Flat 18 Riddell Court SE5 0DS
Flat 17 Riddell Court SE5 0DS
Flat 16 Riddell Court SE5 0DS
Flat 19 Riddell Court SE5 0DS
Flat 22 Riddell Court SE5 0DS
Flat 21 Riddell Court SE5 0DS
Flat 20 Riddell Court SE5 0DS
Flat 11 Riddell Court SE5 0DS
Flat 10 Riddell Court SE5 0DS
Flat 9 Riddell Court SE5 0DS
Flat 12 Riddell Court SE5 0DS
Flat 15 Riddell Court SE5 0DS
Flat 14 Riddell Court SE5 0DS
Flat 13 Riddell Court SE5 0DS
Flat 32 Riddell Court SE5 0DS
Flat 31 Riddell Court SE5 0DS
Flat 30 Riddell Court SE5 0DS
Flat 33 Riddell Court SE5 0DS
4-12 Albany Road London SE5 0DS
Flat 34 Riddell Court SE5 0DS
Flat 25 Riddell Court SE5 0DS
Flat 24 Riddell Court SE5 0DS
Flat 23 Riddell Court SE5 0DS
Flat 26 Riddell Court SE5 0DS
Flat 29 Riddell Court SE5 0DS
Flat 28 Riddell Court SE5 0DS
Flat 27 Riddell Court SE5 0DS
Flat 8 Riddell Court SE5 0DS
300a Old Kent Road London SE1 5UE
Thomas A Becket 320-322 Old Kent Road SE1 5UE
The Old Fire Station Building 1000 Shorncliffe Road SE1 5QY
1 Mina Road London SE17 2QS
37 Coopers Road London SE1 5HY
Shop 384 Old Kent Road SE1 5AA
302 Old Kent Road London SE1 5UE
292 Old Kent Road London SE1 5UE
Unit 2 Southernwood Retail Park SE1 5JJ
294 Old Kent Road London SE1 5UE
First Floor And Second Floor Flat 296 Old Kent Road SE1 5UE
294a Old Kent Road London SE1 5UE
Flat 3 Riddell Court SE5 0DS
Flat 2 Riddell Court SE5 0DS
Flat 1 Riddell Court SE5 0DS
Flat 4 Riddell Court SE5 0DS
Flat 7 Riddell Court SE5 0DS
Flat 6 Riddell Court SE5 0DS
Flat 5 Riddell Court SE5 0DS
13 Cobourg Road London SE5 0HT
11 Cobourg Road London SE5 0HT
1 Cobourg Road London SE5 0HT
3 Cobourg Road London SE5 0HT
7 Cobourg Road London SE5 0HT
5 Cobourg Road London SE5 0HT
354 Old Kent Road London SE1 5AA
Second Floor Flat 382 Old Kent Road SE1 5AA
Second Floor Flat 384 Old Kent Road SE1 5AA
Second Floor Flat 366 Old Kent Road SE1 5AA
Second Floor Flat 378 Old Kent Road SE1 5AA
352-354 Old Kent Road London SE1 5AA
107 Dunton Road London SE1 5HG
12 Burnham Close London SE1 5RL
11 Burnham Close London SE1 5RL
10 Burnham Close London SE1 5RL
1 Burnham Close London SE1 5RL
37 Bushwood Drive London SE1 5RE
36 Bushwood Drive London SE1 5RE
2 Burnham Close London SE1 5RL
5 Burnham Close London SE1 5RL
4 Burnham Close London SE1 5RL
3 Burnham Close London SE1 5RL
21 Bushwood Drive London SE1 5RE
2 Bushwood Drive London SE1 5RE
1 Bushwood Drive London SE1 5RE
21 Lynton Road London SE1 5QR
3 Bushwood Drive London SE1 5RE
6 Bushwood Drive London SE1 5RE
5 Bushwood Drive London SE1 5RE
4 Bushwood Drive London SE1 5RE
304 Old Kent Road London SE1 5UE
296 Old Kent Road London SE1 5UE
290 Old Kent Road London SE1 5UE
288a Old Kent Road London SE1 5UE
Flat 1 Wessex House SE1 5JQ
St Georges Methodist Church Oakley Place SE1 5AD
16 Bushwood Drive London SE1 5RE
15 Bushwood Drive London SE1 5RE
14 Bushwood Drive London SE1 5RE
17 Bushwood Drive London SE1 5RE
20 Bushwood Drive London SE1 5RE
19 Bushwood Drive London SE1 5RE
18 Bushwood Drive London SE1 5RE
9 Bushwood Drive London SE1 5RE
8 Bushwood Drive London SE1 5RE
7 Bushwood Drive London SE1 5RE
10 Bushwood Drive London SE1 5RE
13 Bushwood Drive London SE1 5RE
12 Bushwood Drive London SE1 5RE
11 Bushwood Drive London SE1 5RE
13 Burnham Close London SE1 5RL
55 Cadet Drive London SE1 5RU
54 Cadet Drive London SE1 5RU
53 Cadet Drive London SE1 5RU
56 Cadet Drive London SE1 5RU
59 Cadet Drive London SE1 5RU
58 Cadet Drive London SE1 5RU
57 Cadet Drive London SE1 5RU
6 Burnell Walk London SE1 5RS
5 Burnell Walk London SE1 5RS
4 Burnell Walk London SE1 5RS
7 Burnell Walk London SE1 5RS
10 Burnell Walk London SE1 5RS
9 Burnell Walk London SE1 5RS
8 Burnell Walk London SE1 5RS
6 Longfellow Way London SE1 5TB
5 Longfellow Way London SE1 5TB
4 Longfellow Way London SE1 5TB
7 Longfellow Way London SE1 5TB
10 Longfellow Way London SE1 5TB
9 Longfellow Way London SE1 5TB
8 Longfellow Way London SE1 5TB
62 Cadet Drive London SE1 5RU
61 Cadet Drive London SE1 5RU
60 Cadet Drive London SE1 5RU
63 Cadet Drive London SE1 5RU
3 Longfellow Way London SE1 5TB
2 Longfellow Way London SE1 5TB
1 Longfellow Way London SE1 5TB
3 Burnell Walk London SE1 5RS
4 Abingdon Close London SE1 5RW
3 Abingdon Close London SE1 5RW
2 Abingdon Close London SE1 5RW
5 Abingdon Close London SE1 5RW
8 Abingdon Close London SE1 5RW

Second Floor Flat 370 Old Kent Road SE1 5AA
Second Floor Flat 376 Old Kent Road SE1 5AA
Flat 2 374 Old Kent Road SE1 5AA
Flat 1 374 Old Kent Road SE1 5AA
Second Floor Flat 372 Old Kent Road SE1 5AA
Second Floor Flat 360 Old Kent Road SE1 5AA
Ground Floor Flat 372 Old Kent Road SE1 5AA
23 Lynton Road London SE1 5QR
Ground Floor Office Astley House Astley Estate SE1 5HU
382 Old Kent Road London SE1 5AA
Wessex House 375 Old Kent Road SE1 5JQ
Flat 2 368 Old Kent Road SE1 5AA
First Floor Flat 302 Old Kent Road SE1 5UE
First Floor Flat 382 Old Kent Road SE1 5AA
Basement And Ground Floor Flat 380 Old Kent Road SE1 5AA
First Floor Flat 360 Old Kent Road SE1 5AA
First Floor Flat 384 Old Kent Road SE1 5AA
First Floor Flat 366 Old Kent Road SE1 5AA
First Floor Flat 372 Old Kent Road SE1 5AA
Basement And Ground Floor 370 Old Kent Road SE1 5AA
Ground Floor Flat 378 Old Kent Road SE1 5AA
Flat C 79 Dunton Road SE1 5TW
Flat B 358 Old Kent Road SE1 5AA
Flat B 79 Dunton Road SE1 5TW
First Floor Flat 380 Old Kent Road SE1 5AA
Second Floor Flat 380 Old Kent Road SE1 5AA
First Floor Flat 370 Old Kent Road SE1 5AA
Flat 1 368 Old Kent Road SE1 5AA
Flat 2 361 Old Kent Road SE1 5JH
Flat 1 361 Old Kent Road SE1 5JH
First Floor Flat 378 Old Kent Road SE1 5AA
Flat 3 361 Old Kent Road SE1 5JH
Flat A 358 Old Kent Road SE1 5AA
Flat A 79 Dunton Road SE1 5TW
Flat 4 361 Old Kent Road SE1 5JH
Flat 19 Wessex House SE1 5JQ
Flat 18 Wessex House SE1 5JQ
Flat 17 Wessex House SE1 5JQ
Flat 20 Wessex House SE1 5JQ
Flat 23 Wessex House SE1 5JQ
Flat 22 Wessex House SE1 5JQ
Flat 21 Wessex House SE1 5JQ
Flat 12 Wessex House SE1 5JQ
Flat 11 Wessex House SE1 5JQ
Flat 10 Wessex House SE1 5JQ
Flat 13 Wessex House SE1 5JQ
Flat 16 Wessex House SE1 5JQ
Flat 15 Wessex House SE1 5JQ
Flat 14 Wessex House SE1 5JQ
Flat 33 Wessex House SE1 5JQ
Flat 32 Wessex House SE1 5JQ
Flat 31 Wessex House SE1 5JQ
Flat 34 Wessex House SE1 5JQ
Flat 37 Wessex House SE1 5JQ
Flat 36 Wessex House SE1 5JQ
Flat 35 Wessex House SE1 5JQ
Flat 26 Wessex House SE1 5JQ
Flat 25 Wessex House SE1 5JQ
Flat 24 Wessex House SE1 5JQ
Flat 27 Wessex House SE1 5JQ
Flat 30 Wessex House SE1 5JQ
Flat 29 Wessex House SE1 5JQ
Flat 28 Wessex House SE1 5JQ
Flat 9 Wessex House SE1 5JQ
38 Chaucer Drive London SE1 5TA
36 Chaucer Drive London SE1 5TA
34 Chaucer Drive London SE1 5TA
40 Chaucer Drive London SE1 5TA
46 Chaucer Drive London SE1 5TA
44 Chaucer Drive London SE1 5TA
42 Chaucer Drive London SE1 5TA
24 Chaucer Drive London SE1 5TA
22 Chaucer Drive London SE1 5TA
7 Abingdon Close London SE1 5RW
6 Abingdon Close London SE1 5RW
16 Burnham Close London SE1 5RL
15 Burnham Close London SE1 5RL
14 Burnham Close London SE1 5RL
17 Burnham Close London SE1 5RL
1 Abingdon Close London SE1 5RW
19 Burnham Close London SE1 5RL
18 Burnham Close London SE1 5RL
18 Abingdon Close London SE1 5RW
17 Abingdon Close London SE1 5RW
16 Abingdon Close London SE1 5RW
19 Abingdon Close London SE1 5RW
2 Burnell Walk London SE1 5RS
1 Burnell Walk London SE1 5RS
20 Abingdon Close London SE1 5RW
11 Abingdon Close London SE1 5RW
10 Abingdon Close London SE1 5RW
9 Abingdon Close London SE1 5RW
12 Abingdon Close London SE1 5RW
15 Abingdon Close London SE1 5RW
14 Abingdon Close London SE1 5RW
13 Abingdon Close London SE1 5RW
Flat 4 Brodie House Astley Estate SE1 5HX
Flat 30 Brodie House Astley Estate SE1 5HX
Flat 3 Brodie House Astley Estate SE1 5HX
Flat 5 Brodie House Astley Estate SE1 5HX
Flat 8 Brodie House Astley Estate SE1 5HX
Flat 7 Brodie House Astley Estate SE1 5HX
Flat 6 Brodie House Astley Estate SE1 5HX
Flat 25 Brodie House Astley Estate SE1 5HX
Flat 24 Brodie House Astley Estate SE1 5HX
Flat 23 Brodie House Astley Estate SE1 5HX
Flat 26 Brodie House Astley Estate SE1 5HX
Flat 29 Brodie House Astley Estate SE1 5HX
Flat 28 Brodie House Astley Estate SE1 5HX
Flat 27 Brodie House Astley Estate SE1 5HX
Flat 17 Rivet House Astley Estate SE1 5HY
Flat 16 Rivet House Astley Estate SE1 5HY
Flat 15 Rivet House Astley Estate SE1 5HY
Flat 18 Rivet House Astley Estate SE1 5HY
Flat 20 Rivet House Astley Estate SE1 5HY
Flat 2 Rivet House Astley Estate SE1 5HY
Flat 19 Rivet House Astley Estate SE1 5HY
Flat 10 Rivet House Astley Estate SE1 5HY
Flat 1 Rivet House Astley Estate SE1 5HY
Flat 9 Brodie House Astley Estate SE1 5HX
Flat 11 Rivet House Astley Estate SE1 5HY
Flat 14 Rivet House Astley Estate SE1 5HY
Flat 13 Rivet House Astley Estate SE1 5HY
Flat 12 Rivet House Astley Estate SE1 5HY
Flat 22 Brodie House Astley Estate SE1 5HX
Flat 5 Astley House Astley Estate SE1 5HU
Flat 4 Astley House Astley Estate SE1 5HU
Flat 36 Astley House Astley Estate SE1 5HU
Flat 6 Astley House Astley Estate SE1 5HU
Flat 9 Astley House Astley Estate SE1 5HU
Flat 8 Astley House Astley Estate SE1 5HU
Flat 7 Astley House Astley Estate SE1 5HU
Flat 31 Astley House Astley Estate SE1 5HU
Flat 30 Astley House Astley Estate SE1 5HU
Flat 3 Astley House Astley Estate SE1 5HU
Flat 32 Astley House Astley Estate SE1 5HU
Flat 35 Astley House Astley Estate SE1 5HU
Flat 34 Astley House Astley Estate SE1 5HU
Flat 33 Astley House Astley Estate SE1 5HU
Flat 18 Brodie House Astley Estate SE1 5HX
Flat 17 Brodie House Astley Estate SE1 5HX
Flat 16 Brodie House Astley Estate SE1 5HX
Flat 19 Brodie House Astley Estate SE1 5HX
Flat 21 Brodie House Astley Estate SE1 5HX
Flat 20 Brodie House Astley Estate SE1 5HX
Flat 2 Brodie House Astley Estate SE1 5HX

20 Chaucer Drive London SE1 5TA
26 Chaucer Drive London SE1 5TA
32 Chaucer Drive London SE1 5TA
30 Chaucer Drive London SE1 5TA
28 Chaucer Drive London SE1 5TA
Flat 4 Wessex House SE1 5JQ
Flat 3 Wessex House SE1 5JQ
Flat 2 Wessex House SE1 5JQ
Flat 5 Wessex House SE1 5JQ
Flat 8 Wessex House SE1 5JQ
Flat 7 Wessex House SE1 5JQ
Flat 6 Wessex House SE1 5JQ
52 Chaucer Drive London SE1 5TA
50 Chaucer Drive London SE1 5TA
48 Chaucer Drive London SE1 5TA
54 Chaucer Drive London SE1 5TA
Fire Station 405 Old Kent Road SE1 5JH
58 Chaucer Drive London SE1 5TA
56 Chaucer Drive London SE1 5TA
Flat 38 Wessex House SE1 5JQ
164 Chaucer Drive London SE1 5RG
162 Chaucer Drive London SE1 5RG
160 Chaucer Drive London SE1 5RG
166 Chaucer Drive London SE1 5RG
172 Chaucer Drive London SE1 5RG
170 Chaucer Drive London SE1 5RG
168 Chaucer Drive London SE1 5RG
150 Chaucer Drive London SE1 5RG
148 Chaucer Drive London SE1 5RG
Flat 68 Wessex House SE1 5JQ
152 Chaucer Drive London SE1 5RG
158 Chaucer Drive London SE1 5RG
156 Chaucer Drive London SE1 5RG
154 Chaucer Drive London SE1 5RG
364 Old Kent Road London SE1 5AA
360 Old Kent Road London SE1 5AA
314-318 Old Kent Road London SE1 5UE
288 Old Kent Road London SE1 5UE
300 Old Kent Road London SE1 5UE
178 Chaucer Drive London SE1 5RG
176 Chaucer Drive London SE1 5RG
174 Chaucer Drive London SE1 5RG
Unit 1 Southernwood Retail Park SE1 5JJ
Second Floor Flat 302 Old Kent Road SE1 5UE
Unit 4 Southernwood Retail Park SE1 5JJ
Unit 3 Southernwood Retail Park SE1 5JJ
Flat 67 Wessex House SE1 5JQ
Flat 48 Wessex House SE1 5JQ
Flat 47 Wessex House SE1 5JQ
Flat 46 Wessex House SE1 5JQ
Flat 49 Wessex House SE1 5JQ
Flat 52 Wessex House SE1 5JQ
Flat 51 Wessex House SE1 5JQ
Flat 50 Wessex House SE1 5JQ
Flat 41 Wessex House SE1 5JQ
Flat 40 Wessex House SE1 5JQ
Flat 39 Wessex House SE1 5JQ
Flat 42 Wessex House SE1 5JQ
Flat 45 Wessex House SE1 5JQ
Flat 44 Wessex House SE1 5JQ
Flat 43 Wessex House SE1 5JQ
Flat 62 Wessex House SE1 5JQ
Flat 61 Wessex House SE1 5JQ
Flat 60 Wessex House SE1 5JQ
Flat 63 Wessex House SE1 5JQ
Flat 66 Wessex House SE1 5JQ
Flat 65 Wessex House SE1 5JQ
Flat 64 Wessex House SE1 5JQ
Flat 55 Wessex House SE1 5JQ
Flat 54 Wessex House SE1 5JQ
Flat 53 Wessex House SE1 5JQ
Flat 56 Wessex House SE1 5JQ
Flat 59 Wessex House SE1 5JQ
Flat 11 Brodie House Astley Estate SE1 5HX
Flat 10 Brodie House Astley Estate SE1 5HX
Flat 1 Brodie House Astley Estate SE1 5HX
Flat 12 Brodie House Astley Estate SE1 5HX
Flat 15 Brodie House Astley Estate SE1 5HX
Flat 14 Brodie House Astley Estate SE1 5HX
Flat 13 Brodie House Astley Estate SE1 5HX
Flat 21 Rivet House Astley Estate SE1 5HY
Flat 4 Stafford House Astley Estate SE1 5JB
Flat 3 Stafford House Astley Estate SE1 5JB
Flat 2 Stafford House Astley Estate SE1 5JB
Flat 5 Stafford House Astley Estate SE1 5JB
Flat 8 Stafford House Astley Estate SE1 5JB
Flat 7 Stafford House Astley Estate SE1 5JB
Flat 6 Stafford House Astley Estate SE1 5JB
Flat 9 Fitzroy House Astley Estate SE1 5HZ
Flat 8 Fitzroy House Astley Estate SE1 5HZ
Flat 7 Fitzroy House Astley Estate SE1 5HZ
Flat 1 Stafford House Astley Estate SE1 5JB
Flat 12 Stafford House Astley Estate SE1 5JB
Flat 11 Stafford House Astley Estate SE1 5JB
Flat 10 Stafford House Astley Estate SE1 5JB
Flat 6 Clare House Astley Estate SE1 5JD
Flat 5 Clare House Astley Estate SE1 5JD
Flat 4 Clare House Astley Estate SE1 5JD
Flat 7 Clare House Astley Estate SE1 5JD
Muslim Association Of Nigeria 365 Old Kent Road SE1 5JH
Flat 9 Clare House Astley Estate SE1 5JD
Flat 8 Clare House Astley Estate SE1 5JD
Flat 10 Clare House Astley Estate SE1 5JD
Flat 1 Clare House Astley Estate SE1 5JD
Flat 9 Stafford House Astley Estate SE1 5JB
Flat 11 Clare House Astley Estate SE1 5JD
Flat 3 Clare House Astley Estate SE1 5JD
Flat 2 Clare House Astley Estate SE1 5JD
Flat 12 Clare House Astley Estate SE1 5JD
Flat 6 Fitzroy House Astley Estate SE1 5HZ
Flat 30 Rivet House Astley Estate SE1 5HY
Flat 3 Rivet House Astley Estate SE1 5HY
Flat 29 Rivet House Astley Estate SE1 5HY
Flat 31 Rivet House Astley Estate SE1 5HY
Flat 5 Rivet House Astley Estate SE1 5HY
Flat 4 Rivet House Astley Estate SE1 5HY
Flat 32 Rivet House Astley Estate SE1 5HY
Flat 24 Rivet House Astley Estate SE1 5HY
Flat 23 Rivet House Astley Estate SE1 5HY
Flat 22 Rivet House Astley Estate SE1 5HY
Flat 25 Rivet House Astley Estate SE1 5HY
Flat 28 Rivet House Astley Estate SE1 5HY
Flat 27 Rivet House Astley Estate SE1 5HY
Flat 26 Rivet House Astley Estate SE1 5HY
Flat 14 Fitzroy House Astley Estate SE1 5HZ
Flat 13 Fitzroy House Astley Estate SE1 5HZ
Flat 12 Fitzroy House Astley Estate SE1 5HZ
Flat 2 Fitzroy House Astley Estate SE1 5HZ
Flat 5 Fitzroy House Astley Estate SE1 5HZ
Flat 4 Fitzroy House Astley Estate SE1 5HZ
Flat 3 Fitzroy House Astley Estate SE1 5HZ
Flat 8 Rivet House Astley Estate SE1 5HY
Flat 7 Rivet House Astley Estate SE1 5HY
Flat 6 Rivet House Astley Estate SE1 5HY
Flat 9 Rivet House Astley Estate SE1 5HY
Flat 11 Fitzroy House Astley Estate SE1 5HZ
Flat 10 Fitzroy House Astley Estate SE1 5HZ
Flat 1 Fitzroy House Astley Estate SE1 5HZ
375 Old Kent Road Wessex House SE1 5JQ
16 Comfort Street London SE15 6BT
85 Marcia Road London SE1 5XF
85a Stamford St London SE19NB
81 Marcia Road London SE1 5XF
85 Marcia Road London SE1 5XF
85 Marcia Road London SE1 5XF
54 Marcia Road London SE1 5XF

Flat 58 Wessex House SE1 5JQ
Flat 57 Wessex House SE1 5JQ
11 Longfellow Way London SE1 5TB
Flat 9 Lackland House Astley Estate SE1 5HS
Flat 8 Lackland House Astley Estate SE1 5HS
Flat 7 Lackland House Astley Estate SE1 5HS
Flat 37 Astley House Astley Estate SE1 5HT
Flat 40 Astley House Astley Estate SE1 5HT
Flat 39 Astley House Astley Estate SE1 5HT
Flat 38 Astley House Astley Estate SE1 5HT
Flat 2 Lackland House Astley Estate SE1 5HS
Flat 14 Lackland House Astley Estate SE1 5HS
Flat 13 Lackland House Astley Estate SE1 5HS
Flat 3 Lackland House Astley Estate SE1 5HS
Flat 6 Lackland House Astley Estate SE1 5HS
Flat 5 Lackland House Astley Estate SE1 5HS
Flat 4 Lackland House Astley Estate SE1 5HS
Flat 50 Astley House Astley Estate SE1 5HT

52 Marcia Road London SE1 5XF
20 Marcia Road London SE1 5XF
50 Marcia Road London SE1 5XF
79 Marcia Road London SE1 5XF
5 Porter Street London SE1 9HD
91 Marcia Road London SE1 5XF
93 Marcia Road London SE1 5XF
Old Kent Road London SE1 5TY
81 Mina Road London SE17 2QS
13 Aland Court Finland Street SE16 7LA
12 Lynton Road London SE1 5QR
33 Bolanachi Building Spa Road London SE16 3SG
18 Marcia Road Southwark SE1 5XF
4 Geoffrey Rd London SE4 1NT
2, Horseshoe Wharf 6, Clink Street SE1 9FE
62 Reverdy Road London SE1 5QD
57 Pages Walk London SE1 4HD
58 Marcia Road London SE1 5XF
Flat 1, 370 Old Kent Road London SE1 5AA

Re-consultation: 16/04/2019

Consultation responses received

Internal services

Economic Development Team
Flood and Drainage Team

Statutory and non-statutory organisations

Arqvia, Winchester Court
Environment Agency
Historic England
Metropolitan Police Service (Designing out Crime)
National Air Traffic Safeguarding Office
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Flat 1 Fitzroy House Astley Estate SE1 5HZ
Flat 1, 370 Old Kent Road London SE1 5AA
Flat 3 Wessex House SE1 5JQ
Flat 5 Fitzroy House Astley Estate SE1 5HZ
Old Kent Road London SE1 5TY
10 Keats Close London SE1 5TZ
12 Lynton Road London SE1 5QR
13 Aland Court Finland Street SE16 7LA
130 Chaucer Drive London SE1 5RG
16 Comfort Street London SE15 6BT
18 Bushwood Drive London SE1 5RE
18 Marcia Road Southwark SE1 5XF
2, Horseshoe Wharf 6, Clink Street SE1 9FE
2 Wordsworth Road London SE1 5TX
20 Marcia Road London SE1 5XF
23 Keats Close London SE1 5TZ
33 Bolanachi Building Spa Road London SE16 3SG
4 Geoffrey Rd London SE4 1NT
5 Porter Street London SE1 9HD
50 Marcia Road London SE1 5XF
52 Marcia Road London SE1 5XF
54 Marcia Road London SE1 5XF
57 Pages Walk London SE1 4HD
58 Marcia Road London SE1 5XF
62 Reverdy Road London SE1 5QD
79 Marcia Road London SE1 5XF
81 Marcia Road London SE1 5XF
81 Mina Road London SE17 2QS
85 Marcia Road London SE1 5XF
85 Marcia Road London SE1 5XF

85 Marcia Road London SE1 5XF
85a Stamford St London SE19NB
87 Oxley Close London SE1 5HF
91 Marcia Road London SE1 5XF
93 Marcia Road London SE1 5XF